

INITIAL
NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION
AND NOTICING ACTION

Docket No. 50-366 Facility: Edwin I Hatch, Unit No. 2
Licensee: Georgia Power Company Date of application: August 6, 1984, as
supplemented August 10, 14 and
16, 1984
Request for:
TS changes to Table 3.6.3-1 to require certain containment isolation
valves be required to automatically close upon receipt of low-low reactor water level
signal rather than upon receipt of a low reactor water level signal as currently
required

(See attached notice or press release for more details.)

Initial Determination:

- () Proposed determination - amendment request involves no significant hazards
considerations (NSHC).
() Final determination - amendment request involves significant hazards
considerations (SHC).

Basis for Determination

- () Licensee's NSHC discussion has been reviewed and is accepted. See attached
amendment request.
() Basis for this determination is presented in the attached notice.
(XX) Other (state): See Attached Sheet.

(Attach additional sheets as needed.)

Initial Noticing Action: (Attach appropriate notice or input for monthly FRN)

1. () Monthly FRN. Notice of opportunity for hearing (30 days) and request
for comments on proposed NSHC determination - monthly FRN input is
attached (Attachment 8).
2. () Individual FRN (30 days). Same notice matter as above. Time does not
allow waiting for next monthly FRN (Attachments 9a and 9b).

(THIS FORM SHOULD BE TYPED EXCEPT FOR UNUSUAL, URGENT CIRCUMSTANCES.)

Basis for Determination

The Commission has made a proposed determination that the amendment request involves no significant hazards consideration. Under the Commission's regulations in 10 CFR 50.92, this means that operation of the facility in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

The amendment would modify Technical Specification Table 3.6.3-1 to require that the following containment isolation valves be required to automatically close upon receipt of a low-low-low (Level 1) reactor water level signal rather than upon receipt of a low (Level 3) reactor water level as currently required:

Containment Spray Isolation Valves	2E11-F016 A and B 2E11-F028 A and B
RHR Heat Exchanger Drain Isolation Valves	2E11-F011 A and B 2E11-F026 A and B
Core Spray System Flow Test Line Isolation Valves	2E21-F015 A and B

The reason for the requested change is to make the Technical Specifications consistent with the signal design specifications and with the as-built systems.

The licensee recently discovered that the system is installed such that these valves are closed upon receipt of a Level 1 reactor water level signal rather than a Level 3 reactor water level signal, and, therefore, the current Technical Specification requirements that they would close upon receipt of a Level 3 signal cannot be met.

Rather than modify the hardware installation, the licensee has chosen to request that the Technical Specifications be modified to agree with the current as-built capability of the systems.

The Commission has provided guidance concerning the application of the standards in 10 CFR 50.92 by providing certain examples (48 FR 14870). One of the examples of actions involving no significant hazards considerations relates to a change which either may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within acceptable criteria with respect to the system or component specified in the Standard Review Plan.

The proposed change would indicate that the subject valves would automatically close upon receipt of a low-low-low reactor water level (RPV Level 1) signal rather than close upon receipt of a low reactor water level (RPV Level 3).

The licensee states that the change would make the Technical Specifications consistent with the original design basis (i.e., RPV Level 1), as verified by vendor drawings and instrument data sheets. In addition, actuation of these specific valves at RPV Level 1 is consistent with the design bases of the plant reported in the FSAR (Chapter 7.3). Although this change would result in less conservatism and, to some small degree, a decrease in a margin of safety with respect to the current Technical Specifications, it is fully consistent with the acceptance criteria stated in the Standard Review Plan (Section 6.2.4).

On this basis, it fits the above example and the Commission therefore proposes to determine that this action involves no significant hazards considerations.

- 3. () Local media notice. Valid exigent circumstances exist (evaluated below). Local media notice requesting public comments on proposed NSHC determination is attached (Attachment 10).
- 4. (XX) No notice. A valid emergency situation exists (evaluated below) and there is no time for public notice on proposed NSHC determination. (No attachment.)
- 5. () Individual FRN (30-days). Licensee's claim of exigent or emergency circumstances is invalid (evaluated below). Notice of opportunity for hearing (30 days) and request for comments on proposed NSHC determination is attached (Attachments 9a and 9b). Letter of explanation to licensee is also attached.
- 6. () Individual FRN (30-days). The amendment request involves SHC. Notice of opportunity for prior hearing is attached (Attachment 5). Letter to licensee also attached.
- 7. () Individual Short FRN. Valid emergency circumstances exist (evaluated below). There is no time for the usual 30-day FRN. (Attachment 16).

Evaluation of exigent or emergency circumstances (if applicable):

(Emergency circumstances are explained in the attached SE). The licensee states that startup will be delayed without implementation of the proposed TSs because the specific valves in question, if declared inoperable, would cause the "Action" statements for Suppression Pool Cooling to come into play, requiring shutdown in 8 hours. Thus, the licensee would have to delay startup for approximately 22 weeks in order to make alternative hardware changes to correct the recently found discrepancy of water level setpoints.

(attach additional sheets as needed)

Approvals:

	<u>Date</u>
1. <u>George Rivenbark</u> <i>George Rivenbark</i> (Project Manager)	<u>8/20/84</u>
2. <u>John F. Stolz</u> <i>John F. Stolz</i> (Branch Chief)	<u>8/21/84</u>
3. <u><i>[Signature]</i></u> (OELD)	<u>8.21.84</u>

Additional approval (for noticing actions types 3, 4, 5, 6 and 7):

4. <u><i>[Signature]</i></u> (Assistant Director)	<u>8-21-84</u>
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Additional approval (for noticing action types 4 and 5):

5. <u><i>Frank J. Mroga</i></u> (Director, Division of Licensing)	<u>8-22-84</u>
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Attachment: as indicated

cc: Original - Docket File (with note "Docket File only")
Project Manager
Licensing Assistant
Branch Files

FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Docket No. 50-366 Facility Edwin T. Hatch, Unit No. 2

Licensee: Georgia Power Company Date of application August 6, 1984, as supplemented August 10, 14 and 16, 1984

1. Attach initial NSHC determination (Attachment 4) relating to this action.

2. Summary of State telephone consultation: Telephone conversation with J. Hardeman (State of Georgia Radiation Activities) on August 15, 1984. Mr. Hardeman indicated that he had read the GPC proposed TS changes and had no comments on them

3. Summary of any public comments received by telephone:

4. Attach any written State or public comments regarding NSHC.

5. Final determination

(x) The amendment request involves no significant hazards consideration.

() The amendment request involves a significant hazards consideration.

6. Basis for determination and response to comments received. (Attach additional sheets, if necessary.)

See related SE

7. Concurrences:

		<u>Date</u>
a.	<u>George Rivenbark</u> (Project Manager)	<u>8/20/84</u>
b.	<u>John F. Stolz</u> (Branch Chief)	<u>8/21/84</u>
c.	<u>C. Olan Noller</u> (Assistant Director)	
d.	<u>Stoddard</u> (OELD)	<u>8.21.84</u>

8. Approved:

<u>Frank J. Miraglia</u> (Director, Division of Licensing)	<u>8-22-84</u>
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Hatch 1/2
Georgia Power Company

50-321/366

cc w/enclosure(s):

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