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U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Edwin I. Hatch Nuclear Plant
Request to Revise Technical Specifications:
Deletion of Technical Specification 3.3.1.1.I.2

Ladies and Gentlemen:

In accordance with the provisions of 10 CFR 50.90, as required by 10 CFR 50.59(c)(1), Southern Nuclear Operating Company (SNC) is proposing a change to the Edwin I. Hatch Nuclear Plant Unit 1 and Unit 2 Technical Specifications, Appendix A to Operating Licenses DRP-57 and NPF-5, respectively. The proposed change deletes Specification 3.3.1.1.I.2, which requires returning the Oscillating Power Range Monitor (OPRM) to operable status within 120 days of discovering its inoperability. Per existing Specifications, if the inoperable OPRM is not returned to operable status within the 120-day Completion Time, the unit must be shut down. The proposed change allows plant operation to continue, provided the alternate method to detect and suppress thermal-hydraulic instability oscillations is implemented (TS 3.3.1.1.I.1).

Enclosure 1 provides the description of and basis for the proposed change request. Enclosure 2 provides the basis for SNC's determination the proposed change does not involve a significant hazards consideration, and the environmental assessment. Enclosure 3 provides the page change instructions for incorporating the proposed Technical Specifications change, the revised Technical Specifications pages, and associated marked-up pages. Enclosure 4 provides the page change instructions for incorporating the proposed Bases change, the revised Bases pages, and associated marked-up pages

It is noteworthy that the NRC previously approved the requests of the Perry, Columbia, and Fermi stations to allow indefinite operation with the alternate method for detection and suppression of thermal-hydraulic instability oscillations in place.

In accordance with the requirements of 10 CFR 50.90, a copy of this letter and all applicable enclosures will be sent to the designated State official of the Environment Protection Division of the Georgia Department of Natural Resources.

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Mr. H. L. Sumner, Jr. states he is Vice President of Southern Nuclear Operating Company and is authorized to execute this oath on behalf of Southern Nuclear Operating Company, and to the best of his knowledge and belief, the facts set forth in this letter are true.

Respectfully submitted,

H. L. Sumner, Jr.

Sworn to and subscribed before me this 11 *day of* July *2002.*

Notary Public

Commission Expiration Date: 7/27/05

OCV/eb

Enclosures:
1. Description of and Basis for Proposed Change Request
2. 10 CFR 50.92 No Significant Hazards Evaluation and Environmental Assessment
3. Technical Specifications Page Change Instructions, Revised Pages, and Associated Markups
4. Bases Page Change Instructions, Revised Pages, and Associated Markups

cc: Southern Nuclear Operating Company
Mr. P. H. Wells, Nuclear Plant General Manager
SNC Document Management (R-Type A02.001)

U.S. Nuclear Regulatory Commission, Washington, D.C.
Mr. L. N. Olshan, Project Manager - Hatch

U.S. Nuclear Regulatory Commission, Region II
Mr. L. A. Reyes, Regional Administrator
Mr. J. T. Munday, Senior Resident Inspector - Hatch

State of Georgia
Mr. L. C. Barrett, Commissioner - Department of Natural Resources

Enclosure 1

Edwin I. Hatch Nuclear Plant
Request to Revise Technical Specifications:
Deletion of Technical Specification 3.3.1.1.I.2

Description of and Basis for Proposed Change Request

Technical Specification (TS) 3.3.1.1.I.1 requires that an alternate method to detect and suppress thermal-hydraulic instabilities be initiated if the Oscillating Power Range Monitor (OPRM) becomes inoperable. This alternate method may remain in place for a period of 120 days, at which time the OPRM system must be made operable per TS 3.3.1.1.I.2. Otherwise, the unit must be shut down. This proposed TS change deletes TS 3.3.1.1.I.2, thereby allowing indefinite operation with the alternate method for detection and suppression of reactor instabilities in place.

The OPRMs were installed at Southern Nuclear Operating Company's (SNC's) Plant Hatch Unit 1 and Unit 2 as the long-term solution for handling potential reactor instabilities. This particular solution, which is described in NEDO-31960-A, and Supplement 1, "BWR Owners' Group Long-Term Stability Solutions Licensing Methodology," November 1995, and NEDO-32465-A, "Reactor Stability Detect and Suppress Solutions Licensing Basis Methodology for Reload Applications," is referred to as Option III. The NRC approved OPRM implementation at Plant Hatch by letter dated August 20, 1998. Prior to OPRM implementation, operating procedures implemented an alternate method of detecting and suppressing reactor instabilities based upon manual operator actions.

The alternate method was originally intended to be used for a maximum period of 120 days (ref. NEDC-32410P-A, "Nuclear Measurement Analysis and Control Power Range Neutron Monitor (NUMAC PRNM) Retrofit Plus Option III Stability Trip Function," October 1995.) This arbitrary time period was intended to be an outside limit allowing time to implement design changes or analyze and correct some unanticipated characteristic of the instability detection equipment. The evaluation of the maximum time period for having the OPRM inoperable was based upon engineering judgment, and concluded the likelihood of a reactor instability that could not be adequately handled by the alternate method during the 120-day period was negligibly small.

During the summer of 2001, General Electric (GE) notified many utilities with operating BWRs, including SNC, of a potential Part 21 condition concerning OPRM setpoints that are based, in part, upon industry generic information which was assumed to be bounding for all operating conditions. In fact, GE discovered the generic information was <u>not</u> bounding for certain situations in which one or more fuel assemblies are operated at a higher power level than originally analyzed. Consequently, at Plant Hatch, the OPRMs were declared inoperable, TS 3.3.1.1.I.1 was entered, and the alternate method of detecting and suppressing thermal-hydraulic instabilities was initiated. The OPRM system remained functional and thus, was still capable of detecting instabilities and initiating trip functions, albeit with potentially nonconservative setpoints.

Approximately 3 weeks following GE's initial notification of the stability problem, GE provided SNC very conservative setpoints to use until more realistic values could be generated. As a result, the OPRMs were once again declared operable (ref. LER 50-321/2001-003). However, the conservative setpoints provided by GE could have generated trip signals not indicative of true instabilities.

Prior to implementation of the OPRM system at Plant Hatch, as well as many other BWRs, alternate methods were used to detect and suppress reactor instabilities. In fact, Plant Hatch operated using an alternate method to detect and suppress thermal-hydraulic instabilities from 1988 to the time the OPRM system was placed in service. Before the issuance of NEDC 32410P-A, the manual methods for mitigating stability events at Plant Hatch were based upon IEB 88-07, Supplement 1. Generic Letter 94-02, "Long Term Solutions and Upgrade of Interim Operating Recommendations for Thermal Hydraulic Instabilities in Boiling Water Reactors" was issued in 1994. This Generic Letter requested utilities to assure that plant procedures contained adequate actions to mitigate the consequences of instability events. In response to Generic Letter 94-02, Plant Hatch procedures were revised to incorporate, as closely as possible, the guidance from the June 1994 BWR Owners' Group document, "BWROG Guidelines for Stability Interim Corrective Actions."

The Plant Hatch alternate method for detecting and suppressing reactor instabilities with the OPRM inoperable is primarily contained in abnormal operating procedures that, among other things, specify the criteria for defining reactor instabilities such as peak-to-peak fluctuations in Local Power Range Monitors (LPRMs) and Average Power Range Monitors (APRMs). The procedure also provides specific operator actions for mitigating the consequences of such instabilities. The procedures also identify regions of potential instabilities, as well as prohibited regions of operation. These actions meet the intent of the industry guidance for alternate detection and suppression as provided in the 1994 BWROG revised guidance referenced above. Furthermore, Plant Hatch operators receive training on reactor instabilities both in their initial and continuing training. Therefore, the 120-day Completion Time is unnecessary considering the adequacy of the alternate method for detection and suppression of thermal-hydraulic instabilities.

Deletion of the 120-day Completion Time will not affect efforts to repair the OPRM system. Management attention will continue to focus on restoring the OPRM to operable status in a timely manner. Thus, prolonged operation with the OPRM system inoperable is not expected.

Based upon the above discussion, SNC concludes the use of the alternate method for detection and suppression of thermal-hydraulic instabilities will maintain an adequate level of plant safety and thus, is acceptable.

Enclosure 2

Edwin I. Hatch Nuclear Plant
Request to Revise Technical Specifications:
Deletion of Technical Specification 3.3.1.1.I.2

10 CFR 50.92 No Significant Hazards Evaluation
and
Environmental Assessment

In 10 CFR 50.92(c), the Nuclear Regulatory Commission (NRC) provides the following standards to be used in determining the existence of a significant hazards consideration:

> ...a proposed amendment to an operating license for a facility licensed under §50.21(b) or §50.22 or for a testing facility involves no significant hazards consideration, if 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.

Basis for No Significant Hazards Consideration Determination

1. *The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.*

   The Oscillating Power Range Monitor (OPRM) is not designed for the prevention of an instability event or any other previously evaluated event. Accordingly, it cannot increase the probability of an instability event or any other previously evaluated event.

   The consequences of the instability event are not significantly increased, because the alternate method of detection and suppression of thermal-hydraulic instability oscillations is well established at Plant Hatch. Furthermore, operators are adequately trained on instabilities.

   This proposed change to delete the 120-day Completion Time restriction on an inoperable OPRM does not affect any other system designed for the mitigation of previously analyzed events.

   For the above reasons, the probability and consequences of a previously analyzed event are not increased.

2. *The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.*

   The proposed change only deletes a Technical Specifications requirement. It does not physically alter the design, operation, testing, or maintenance of any plant system or piece of equipment. The proposed change introduces no new modes of operation. Consequently, the change does not create the possibility of a new or different kind event.

3. *The change does not involve a significant reduction in the margin of safety.*

   The proposed change deletes the requirement to restore the OPRM system to operable status within 120 days of discovering its inoperability. A manual alternate method to detect and suppress thermal-hydraulic instability oscillations has been included in Plant Hatch procedures for many years. Also, operators are trained on instability events. Accordingly, the manual alternate method is adequate and thus, the margin of safety for the instability event is not significantly reduced.

Environmental Assessment

10 CFR 51.22(c)(9) provides criteria for identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed license amendment will not:

1. Involve a significant hazards consideration;

2. Result in a significant change in the types, or a significant increase in the amounts, of any effluents that may be released offsite;

3. Result in a significant increase in individual or cumulative occupational radiation exposure.

SNC has determined the proposed Technical Specifications change described in Enclosure 1 meets the eligibility requirements for categorical exclusion set forth in 10 CFR 51.22. Accordingly, pursuant to 10 CFR 51.22, no environmental impact statement associated with the issuance of the amendments for the proposed change needs to be prepared. The basis for this determination is as follows:

1. As described in this enclosure, the proposed change does not involve a significant hazards consideration.

2. The proposed change does not result in a significant change in the types of effluents or the amounts of effluents released offsite. The proposed change deletes a Technical Specifications requirement dealing with the OPRMs. The proposed amendment does not make any physical or operating change to the radioactive waste systems or the processing of those wastes. Finally, this amendment proposes no change to the effluent release limits.

3. The proposed change does not alter individual or cumulative radiation exposure. The change deletes the requirement to restore the OPRM system to operable status after 120 days of discovering its inoperability. Operators will use a manual alternate method to detect and suppress instabilities. Since this method is implemented from the control room, neither the operator nor any other individual will receive any additional exposure to radiation.

Enclosure 3

Edwin I. Hatch Nuclear Plant
Request to Revise Technical Specifications:
Deletion of Technical Specification 3.3.1.1.I.2

Technical Specifications Page Change Instructions

Unit 1 Technical Specifications

Page	Instruction
3.3-3	3.3-3

Unit 2 Technical Specifications

Page	Instruction
3.3-3	3.3-3

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
I. As required by Required Action D.1 and referenced in Table 3.3.1.1-1.	I.1 Initiate alternate method to detect and suppress thermal-hydraulic instability oscillations.	12 hours
J. Required Action and associated Completion Time of Condition I not met.	J.1 Be in MODE 2.	4 hours

SURVEILLANCE REQUIREMENTS

----------NOTES----------

1. Refer to Table 3.3.1.1-1 to determine which SRs apply for each RPS Function.

2. When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours provided the associated Function maintains RPS trip capability.

SURVEILLANCE		FREQUENCY
SR 3.3.1.1.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.1.1.2	----------NOTE---------- Not required to be performed until 12 hours after THERMAL POWER ≥ 25% RTP. ---------- Verify the absolute difference between the average power range monitor (APRM) channels and the calculated power is ≤ 2% RTP while operating at ≥ 25% RTP.	7 days

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
I. As required by Required Action D.1 and referenced in Table 3.3.1.1-1.	I.1 Initiate alternate method to detect and suppress thermal-hydraulic instability oscillations.	12 hours
J. Required Action and associated Completion Time of Condition I not met.	J.1 Be in MODE 2.	4 hours

SURVEILLANCE REQUIREMENTS

----------NOTES----------

1. Refer to Table 3.3.1.1-1 to determine which SRs apply for each RPS Function.

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(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
I. As required by Required Action D.1 and referenced in Table 3.3.1.1-1.	I.1 Initiate alternate method to detect and suppress thermal-hydraulic instability oscillations. ~~AND~~ ~~I.2 Restore required channels to OPERABLE.~~	12 hours ~~120 days~~
J. Required Action and associated Completion Time of Condition I not met.	J.1 Be in MODE 2.	4 hours

SURVEILLANCE REQUIREMENTS

----------NOTES----------

1. Refer to Table 3.3.1.1-1 to determine which SRs apply for each RPS Function.
2. When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours provided the associated Function maintains RPS trip capability.

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SR 3.3.1.1.1	Perform CHANNEL CHECK.	12 hours
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(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
I. As required by Required Action D.1 and referenced in Table 3.3.1.1-1.	I.1 Initiate alternate method to detect and suppress thermal-hydraulic instability oscillations. ~~AND~~ ~~I.2 Restore required channels to OPERABLE.~~	12 hours ~~120 days~~
J. Required Action and associated Completion Time of Condition I not met.	J.1 Be in MODE 2.	4 hours

SURVEILLANCE REQUIREMENTS

----------NOTES----------

1. Refer to Table 3.3.1.1-1 to determine which SRs apply for each RPS Function.

2. When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours provided the associated Function maintains RPS trip capability.

SURVEILLANCE		FREQUENCY
SR 3.3.1.1.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.1.1.2	----------NOTE---------- Not required to be performed until 12 hours after THERMAL POWER ≥ 25% RTP. ---------- Verify the absolute difference between the average power range monitor (APRM) channels and the calculated power is ≤ 2% RTP while operating at ≥ 25% RTP.	7 days

(continued)

Enclosure 4

Edwin I. Hatch Nuclear Plant
Request to Revise Technical Specifications:
Deletion of Technical Specification 3.3.1.1.I.2

Bases Page Change Instructions

Unit 1 Bases

Page	Instruction
B 3.3-22	B 3.3-22
B 3.3-23	B 3.3-23

Unit 2 Bases

Page	Instruction
B 3.3-22	B 3.3-22
B 3.3-23	B 3.3-23

BASES

ACTIONS
(continued)

E.1, F.1, G.1, and J.1

If the channel(s) is not restored to OPERABLE status or placed in trip (or the associated trip system placed in trip) within the allowed Completion Time, the plant must be placed in a MODE or other specified condition in which the LCO does not apply. The allowed Completion Times are reasonable, based on operating experience, to reach the specified condition from full power conditions in an orderly manner and without challenging plant systems. In addition, the Completion Times of Required Actions E.1 and J.1 are consistent with the Completion Time provided in LCO 3.2.2, "MINIMUM CRITICAL POWER RATIO (MCPR)."

H.1

If the channel(s) is not restored to OPERABLE status or placed in trip (or the associated trip system placed in trip) within the allowed Completion Time, the plant must be placed in a MODE or other specified condition in which the LCO does not apply. This is done by immediately initiating action to fully insert all insertable control rods in core cells containing one or more fuel assemblies. Control rods in core cells containing no fuel assemblies do not affect the reactivity of the core and are, therefore, not required to be inserted. Action must continue until all insertable control rods in core cells containing one or more fuel assemblies are fully inserted.

I.1

If OPRM Upscale trip capability is not maintained, Condition I exists. Reference 12 justifies use of an alternate method to detect and suppress oscillations for a limited period of time. The alternate method is procedurally established consistent with the guidelines identified in Reference 17 requiring manual operator action to scram the plant if certain predefined events occur. The 12 hour Completion Time is based on engineering judgment to allow orderly transition to the alternate method while limiting the period of time during which no automatic or alternate detect and suppress trip capability is formally in place. Based on the small probability of an instability event occurring, the 12 hour Completion Time is judged to be reasonable.

(continued)

BASES (continued)

SURVEILLANCE REUIREMENTS

As noted at the beginning of the SRs, the SRs for each RPS instrumentation Function are located in the SRs column of Table 3.3.1.1-1.

The Surveillances are modified by a Note to indicate that when a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours, provided the associated Function maintains RPS trip capability. Upon completion of the Surveillance, or expiration of the 6 hour allowance, the channel must be returned to OPERABLE status or the applicable Condition entered and Required Actions taken. This Note is based on the reliability analysis (Ref. 9) assumption of the average time required to perform channel Surveillance. That analysis demonstrated that the 6 hour testing allowance does not significantly reduce the probability that the RPS will trip when necessary.

SR 3.3.1.1.1

Performance of the CHANNEL CHECK once every 12 hours ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations

(continued)

BASES

ACTIONS
(continued)

E.1, F.1, G.1, and J.1

If the channel(s) is not restored to OPERABLE status or placed in trip (or the associated trip system placed in trip) within the allowed Completion Time, the plant must be placed in a MODE or other specified condition in which the LCO does not apply. The allowed Completion Times are reasonable, based on operating experience, to reach the specified condition from full power conditions in an orderly manner and without challenging plant systems. In addition, the Completion Time of Required Actions E.1 and J.1 are consistent with the Completion Time provided in LCO 3.2.2, "MINIMUM CRITICAL POWER RATIO (MCPR)."

H.1

If the channel(s) is not restored to OPERABLE status or placed in trip (or the associated trip system placed in trip) within the allowed Completion Time, the plant must be placed in a MODE or other specified condition in which the LCO does not apply. This is done by immediately initiating action to fully insert all insertable control rods in core cells containing one or more fuel assemblies. Control rods in core cells containing no fuel assemblies do not affect the reactivity of the core and are, therefore, not required to be inserted. Action must continue until all insertable control rods in core cells containing one or more fuel assemblies are fully inserted.

I.1

If OPRM Upscale trip capability is not maintained, Condition I exists. Reference 13 justifies use of an alternate method to detect and suppress oscillations for a limited period of time. The alternate method is procedurally established consistent with the guidelines identified in Reference 18 requiring manual operator action to scram the plant if certain predefined events occur. The 12 hour Completion Time is based on engineering judgment to allow orderly transition to the alternate method while limiting the period of time during which no automatic or alternate detect and suppress trip capability is formally in place. Based on the small probability of an instability event occurring, the 12 hour Completion Time is judged to be reasonable.

(continued)

BASES (continued)

SURVILLANCE REQUIREMENTS

As noted at the beginning of the SRs, the SRs for each RPS instrumentation Function are located in the SRs column of Table 3.3.1.1-1.

The Surveillances are modified by a Note to indicate that when a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours, provided the associated Function maintains RPS trip capability. Upon completion of the Surveillance, or expiration of the 6 hour allowance, the channel must be returned to OPERABLE status or the applicable Condition entered and Required Actions taken. This Note is based on the reliability analysis (Ref. 9) assumption of the average time required to perform channel Surveillance. That analysis demonstrated that the 6 hour testing allowance does not significantly reduce the probability that the RPS will trip when necessary.

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(continued)

BASES

ACTIONS
(continued)

~~I.2~~

~~The alternate method to detect and suppress oscillations implemented in accordance with Required Action I.1 was evaluated based on use up to 120 days (Ref. 12). The evaluation, based on engineering judgment, concluded that the likelihood of an instability event that could not be adequately handled by the alternate method during this 120 day period is negligibly small. The 120 day period is intended to be an outside limit to allow for the case where design changes or extensive analysis may be required to understand or correct some unanticipated characteristic of the instability detection algorithm or equipment. This action is not intended to be, and was not evaluated as, a routine alternative to returning failed or inoperable equipment to OPERABLE status. Correction of routine equipment failure or inoperability is expected to normally be accomplished within the Completion Times allowed for Required Actions for Conditions A and B.~~

SURVEILLANCE
REUIREMENTS

As noted at the beginning of the SRs, the SRs for each RPS instrumentation Function are located in the SRs column of Table 3.3.1.1-1.

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Performance of the CHANNEL CHECK once every 12 hours ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations

(continued)

BASES

ACTIONS
(continued)

~~I.2~~

~~The alternate method to detect and suppress oscillations implemented in accordance with Required Action I.1 was evaluated based on use up to 120 days (Ref. 13). The evaluation, based on engineering judgment, concluded that the likelihood of an instability event that could not be adequately handled by the alternate method during this 120 day period is negligibly small. The 120 day period is intended to be an outside limit to allow for the case where design changes or extensive analysis may be required to understand or correct some unanticipated characteristic of the instability detection algorithms or equipment. This action is not intended to be, and was not evaluated as, a routine alternative to returning failed or inoperable equipment to OPERABLE status. Correction of routine equipment failure or inoperability is expected to normally be accomplished within the Completion Times allowed for Required Actions for Conditions A and B.~~

SURVILLANCE
REQUIREMENTS

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The Surveillances are modified by a Note to indicate that when a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours, provided the associated Function maintains RPS trip capability. Upon completion of the Surveillance, or expiration of the 6 hour allowance, the channel must be returned to OPERABLE status or the applicable Condition entered and Required Actions taken. This Note is based on the reliability analysis (Ref. 9) assumption of the average time required to perform channel Surveillance. That analysis demonstrated that the 6 hour testing allowance does not significantly reduce the probability that the RPS will trip when necessary.

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Performance of the CHANNEL CHECK once every 12 hours ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations

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