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SOUTHERN COMPANY
Energy to Serve Your World℠

July 16, 2002

Docket Nos. 50-321
50-366

HL-6267

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

Edwin I. Hatch Nuclear Plant
Revision to
Request to Revise Technical Specifications:
Quarterly Surveillance Extension

Ladies and Gentlemen:

By letter dated September 20, 2001, Southern Nuclear Operating Company (SNC) submitted to the NRC proposed Technical Specifications (TS) changes that extend quarterly surveillance frequencies to semi-annual; i.e., from 92 days to 184 days. By letter dated January 24, 2002, SNC provided responses to NRC review requests and committed to provide revisions to the September 20, 2001, submittal, "Edwin I. Hatch Nuclear Plant, Request to Revise Technical Specifications: Quarterly Surveillance Extension." By letter dated April 25, 2002, SNC provided revisions to the original surveillance extension request; i.e., TS surveillance frequencies of 92 days, initially proposed to be extended to quarterly, were changed to "92 days on a STAGGERED TEST BASIS." By letter dated July 3, 2002, existing TS surveillance frequencies of 92 days, initially proposed to be extended to semi-annual, were changed to "92 days on an ALTERNATE TEST BASIS."

As a result of the NRC review of the July 3, 2002, submittal, the Staff determined that certain proposed TS Surveillance Requirements (SRs) needed to be altered to reflect Standard TS nomenclature. Specifically, SRs 3.3.5.1.3 and 3.3.5.2.3, requested to be changed from "CHANNEL FUNCTIONAL TEST" to "CHANNEL CALIBRATION," should remain as "CHANNEL FUNCTIONAL TEST." Enclosed are the affected proposed Unit 1 and Unit 2 TS and associated Bases pages that reflect this determination. Also, as a result of the Staff review, the proposed change to SR 3.3.7.1.3 was denied. Therefore, the proposed change to Unit 1 and Unit 2 SR 3.3.7.1.3 was removed from the Quarterly Surveillance Extension request.

Should you have any questions in this regard, please contact this office.

Respectfully submitted,

Lewis Sumner

H. L. Sumner, Jr.

TWL/eb

A001

Enclosure: Page Change Instructions for July 3, 2002, Submittal and Revised TS and Associated Bases Pages

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

Enclosure

Edwin I. Hatch Nuclear Plant
Revision to
Request to Revise Technical Specifications:
Quarterly Surveillance Extension

Page Change Instructions for July 3, 2002, Submittal
and
Revised TS and Associated Bases Pages

Unit 1 Technical Specifications

Page	Instruction
3.3-37	Replace
3.3-45	Replace
3.3-63	Remove

Unit 2 Technical Specifications

Page	Instruction
3.3-37	Replace
3.3-45	Replace
3.3-63	Remove

Unit 1 Bases

Page	Instruction
B 3.3-122	Remove
B 3.3-123	Replace
B 3.3-133	Replace
B 3.3-134	Replace
B 3.3-184	Remove

Unit 2 Bases

Page	Instruction
B 3.3-122	Remove
B 3.3-123	Replace
B 3.3-133	Replace
B 3.3-134	Replace
B 3.3-184	Remove

SURVEILLANCE REQUIREMENTS

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

1. Refer to Table 3.3.5.1-1 to determine which SRs apply for each ECCS 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 as follows: (a) for up to 6 hours for Functions 3.c and 3.f; and (b) for up to 6 hours for Functions other than 3.c and 3.f provided the associated Function or the redundant Function maintains initiation capability.

SURVEILLANCE		FREQUENCY
SR 3.3.5.1.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.5.1.2	Perform CHANNEL FUNCTIONAL TEST.	92 days on an ALTERNATE TEST BASIS
SR 3.3.5.1.3	Perform CHANNEL CALIBRATION.	92 days on an ALTERNATE TEST BASIS
SR 3.3.5.1.4	Perform CHANNEL CALIBRATION.	24 months
SR 3.3.5.1.5	Perform LOGIC SYSTEM FUNCTIONAL TEST.	24 months

SURVEILLANCE REQUIREMENTS

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

1. Refer to Table 3.3.5.2-1 to determine which SRs apply for each RCIC 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 as follows: (a) for up to 6 hours for Function 2; and (b) for up to 6 hours for Functions 1, 3, and 4 provided the associated Function maintains RCIC initiation capability.

SURVEILLANCE		FREQUENCY
SR 3.3.5.2.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.5.2.2	Perform CHANNEL FUNCTIONAL TEST.	92 days on an ALTERNATE TEST BASIS
SR 3.3.5.2.3	Perform CHANNEL CALIBRATION.	92 days on an ALTERNATE TEST BASIS
SR 3.3.5.2.4	Perform CHANNEL CALIBRATION.	24 months
SR 3.3.5.2.5	Perform LOGIC SYSTEM FUNCTIONAL TEST.	24 months

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SURVEILLANCE		FREQUENCY
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SR 3.3.5.1.2	Perform CHANNEL FUNCTIONAL TEST.	92 days on an ALTERNATE TEST BASIS
SR 3.3.5.1.3	Perform CHANNEL CALIBRATION.	92 days on an ALTERNATE TEST BASIS
SR 3.3.5.1.4	Perform CHANNEL CALIBRATION.	24 months
SR 3.3.5.1.5	Perform LOGIC SYSTEM FUNCTIONAL TEST.	24 months

SURVEILLANCE REQUIREMENTS

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SURVEILLANCE		FREQUENCY
SR 3.3.5.2.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.5.2.2	Perform CHANNEL FUNCTIONAL TEST.	92 days on an ALTERNATE TEST BASIS
SR 3.3.5.2.3	Perform CHANNEL CALIBRATION.	92 days on an ALTERNATE TEST BASIS
SR 3.3.5.2.4	Perform CHANNEL CALIBRATION.	24 months
SR 3.3.5.2.5	Perform LOGIC SYSTEM FUNCTIONAL TEST.	24 months

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.5.1.2 (continued)

The 92 day on an ALTERNATE TEST BASIS Frequency is based on a review of the surveillance test history, drift analysis of the associated trip units, and Reference 8.

SR 3.3.5.1.3 and SR 3.3.5.1.4

A CHANNEL CALIBRATION is a complete check of the instrument loop and the sensor. This test verifies the channel responds to the measured parameter within the necessary range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations, consistent with the plant specific setpoint methodology.

The 92 day on an ALTERNATE TEST BASIS Frequency of SR 3.3.5.1.3 is based on a review of the surveillance test history, drift analysis of the associated trip units, and Reference 8.

The 24 month Frequency of SR 3.3.5.1.4 is based on a review of the surveillance test history, drift analysis of the associated instrumentation, and Reference 7.

SR 3.3.5.1.5

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required initiation logic for a specific channel. The system functional testing performed in LCO 3.5.1, LCO 3.5.2, LCO 3.7.2, LCO 3.8.1, and LCO 3.8.2 overlaps this Surveillance to complete testing of the assumed safety function.

The 24 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. The 24 month Frequency is based on a review of the surveillance test history and Reference 7.

REFERENCES

1. FSAR, Section 4.8.

2. FSAR, Section 6.5.

3. FSAR, Section 14.4.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.5.2.1 (continued)

assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the instrument channels could be an indication of excessive instrument drift in one of the channels or something even more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL CALIBRATION.

Agreement criteria are determined by the plant staff based on a combination of the channel instrument uncertainties, including indication and readability. If a channel is outside the criteria, it may be an indication that the instrument has drifted outside its limit.

The Frequency is based upon operating experience that demonstrates channel failure is rare. The CHANNEL CHECK supplements less formal, but more frequent, checks of channels during normal operational use of the displays associated with the channels required by the LCO.

SR 3.3.5.2.2

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology.

The 92 day on an ALTERNATE TEST BASIS Frequency is based on a review of the surveillance test history, drift analysis of the associated trip units, and Reference 4.

SR 3.3.5.2.3 and SR 3.3.5.2.4

A CHANNEL CALIBRATION is a complete check of the instrument loop and the sensor. This test verifies the channel responds to the measured parameter within the necessary range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations, consistent with the plant specific setpoint methodology.

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BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.5.2.3 and SR 3.3.5.2.4 (continued)

The 92 day on an ALTERNATE TEST BASIS Frequency of SR 3.3.5.2.3 is based on a review of the surveillance test history, drift analysis of the associated trip units, and Reference 4.

The 24 month Frequency of SR 3.3.5.2.4 is based on a review of the surveillance test history, drift analysis of the associated instrumentation, and Reference 3.

SR 3.3.5.2.5

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required initiation logic for a specific channel. The system functional testing performed in LCO 3.5.3 overlaps this Surveillance to provide complete testing of the safety function.

The 24 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. The 24 month Frequency is based on a review of the surveillance test history and Reference 3.

REFERENCES

1. GENE-770-06-2, "Addendum to Bases for Changes to Surveillance Test Intervals and Allowed Out-of-Service Times for Selected Instrumentation Technical Specifications," February 1991.

2. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

3. NRC Safety Evaluation Report for Amendment ____.

4. NRC Safety Evaluation Report for Amendment ____, Quarterly Surveillance Extension.

BASES

SURVEILLANCE REQUIREMENTS

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REFERENCES

1. FSAR, Section 5.2.
2. FSAR, Section 6.3.
3. FSAR, Chapter 15.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.5.2.1 (continued)

assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the instrument channels could be an indication of excessive instrument drift in one of the channels or something even more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL CALIBRATION.

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(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.5.2.3 and SR 3.3.5.2.4 (continued)

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