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U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555-0001

Hatch Nuclear Plant Units One and Two
Response to Request for Additional Information on Technical Specifications Revision
Request for Surveillance Requirement 3.3.8.1.4

Ladies and Gentlemen:

Enclosed you will find the Southern Nuclear Operating Company (SNC) response to a request for additional information concerning the June 22, 2004 request to revise the Hatch Nuclear Plant Units 1 and 2 Technical Specifications Surveillance Requirement (SR) 3.3.8.1.4. The SR concerns the logic system functional test (LSFT) for the Loss of Power (LOP) instrumentation relays.

The additional information was requested via facsimile correspondence on August 30, 2004 and dealt with the availability of industry data on the LOP LSFT.

This letter contains no NRC commitments. If you have any questions, please advise.

Sincerely,

A handwritten signature in cursive script that reads "H. L. Sumner, Jr.".

H. L. Sumner, Jr.

HLS/OCV/daj

Enclosure: Response to Request for Additional Information

cc: Southern Nuclear Operating Company
Mr. J. T. Gasser, Executive Vice President
Mr. G. R. Frederick, General Manager – Plant Hatch
RTYPE: CHA02.004

U. S. Nuclear Regulatory Commission
Dr. W. D. Travers, Regional Administrator
Mr. C. Gratton, NRR Project Manager – Hatch
Mr. D. S. Simpkins, Senior Resident Inspector – Hatch

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Enclosure

Hatch Nuclear Plant Units One and Two Response to Request for Additional Information on Technical Specifications Revision Request for Surveillance Requirement 3.3.8.1.4

By letter dated June 22, 2004 Southern Nuclear Operating Company (SNC) requested a change to the Hatch Nuclear Plant Units 1 and 2 Technical Specifications (TS) to revise the frequency of the Logic System Functional Test (LSFT) for the Loss of Off-site Power (LOP) instrumentation, Surveillance Requirement (SR) 3.3.8.1.4. The proposed change decreases the frequency from once per 18 months to once per 24 months. In support of the amendment request, SNC provided information concerning the surveillance data history of SR 3.3.8.1.4 at Plant Hatch. On August 30, 2004 NRC requested information, via facsimile transmittal, on industry experience with respect to LOP LSFT performance.

Accordingly, SNC has completed an informal survey of several nuclear units (12) to learn of their experience for the last several years with respect to LOP LSFT testing. Some utilities looked back for 2 years worth of information, some as much as 12 years. SNC has learned that these units have, for the most part, experienced successful testing with their LOP LSFT. Although some failures were experienced in these tests, there has not been the magnitude of failures that would necessarily prohibit the LSFT frequency from being decreased.

In addition to the utilities surveyed above, SNC has also learned that TS changes have been approved by NRC to decrease the surveillance frequencies to support 24 month cycles at the Perry, Dresden, Quad Cities, and LaSalle plants. During these utilities' review of their surveillance data, no functional failures of the LOP instrumentation LSFT were noted.

Summarizing, the SNC research has not discovered any significant industry problems which would prevent decreasing the frequency of the Hatch Nuclear Plant LSFT for the LOP relays.