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From: Robert Schin, R2
To: Qualls, Phil; Salley, Mark
Date: 10/22/03 11:27AM
Subject: Hatch denial of NCV

Phil & Mark,

I am asking for your opinion(s) on positions that Hatch has stated in a written denial of a Green finding and NCV. The NCV was for failure to protect cables from fire damage as required by 10 CFR 50, Appendix R, Section III. G.2, and instead having local manual operator actions.

One example of the NCV that Hatch took exception to involved a local manual action to restore power to battery chargers after a fire and a loss of offsite power. (The battery chargers had an undervoltage lockout and would not automatically load onto the EDG.)

The licensee's safe shutdown analysis, operators, and engineers all stated that the battery chargers were needed to maintain hot shutdown. They needed to be repowered within two hours, before the batteries would expire.

The licensee's safe shutdown analysis did not analyze all cables in a fire area for affects on offsite power, but instead conservatively assumed that a fire in any area could cause a loss of offsite power. Based on discussions with engineers and operators, at least one III.G.2 fire area selected for inspection contained cables such that a fire could cause a loss of offsite power (the East Cableway, on the 130 ft. level of the control building and turbine building).

Hatch contentions:
1. The action of repowering the battery chargers is done for any loss of offsite power. Thus, the step is not in the procedure for compliance with Appendix R.

2. The combination of events of a fire concurrent with a loss of offsite power is only required for Appendix R for 'alternative' or 'dedicated' shutdown. For plant Hatch, this represents a control room, computer room, or cable spreading room fire.

3. The fire does not directly affect the battery chargers. Instead, the affect is indirect in that the fire causes a loss of offsite power which in turn causes a loss of the battery chargers.

4. In an October 31, 1986, response to a Request for Additional Information regarding an Appendix R Exemption Request on control room emergency lighting, the manual action of reenergizing the battery chargers was described. The January 2, 1987, NRC SER granting the Appendix R lighting exemption also took note of the battery chargers. [NOTE: I checked these references, verified the licensee's statements, and noted that the SER did not mention manual operator actions related to the battery chargers. The SER approved the exemption for control room emergency lighting and stated: "The station batteries have the capability to power the control room emergency lights and other required loads for a minimum of 120 minutes. After the emergency diesel generators start, the station battery chargers can maintain the required 125-V-dc load."]

CC: Brown, Eva; O'Donohue, Kathleen; Ogle, Charles R.; Payne, Charlie

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