February 2, 2006

MEMORANDUM TO: Evangelos C. Marinos, Chief

Plant Licensing Branch II-1

Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

FROM: Christopher Gratton, Sr. Project Manager

Plant Licensing Branch II-1

Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

SUBJECT: EDWIN I. HATCH NUCLEAR PLANT, UNIT NOS. 1 AND 2 -

FACSIMILE TRANSMISSION OF DRAFT REQUEST FOR

ADDITIONAL INFORMATION (TAC NOS. MC7626 AND MC7627)

/RA/

The Nuclear Regulatory Commission (NRC) staff transmitted the attached facsimile containing questions to Mr. Ray Baker of the Southern Nuclear Operating Company on August 31, 2005. The questions supported a conference call with the licensee held on September 9, 2005, regarding the licensee's submittal dated July 11, 2005. The licensee's application requested relief from various inservice testing requirements. This memorandum and the attached questions do not convey or represent an Nuclear Regulatory Commission staff position regarding the licensee's request.

Docket Nos. 50-321 and 50-366

Attachment: Draft Request for Additional Information sent August 31, 2005

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CHawes for M O'Brien

Draft Request for Additional Information (RAI)
Hatch Nuclear Plant Units 1 and 2
Fourth Ten-year Interval Inservice Testing Program
Relief Requests for Pumps and Valves
Docket Nos. 50-321 and 50-366

References:

1. Southern Company letter to the Nuclear Regulatory Commission (NRC), "Edwin I. Hatch Nuclear Plant Fourth 10-year Interval Inservice Testing (IST) Program Update Submittal" for Hatch Nuclear Plant Units 1 and 2, dated July 11, 2005.

The NRC staff needs the following additional information to complete its review.

Pump Relief Request RR-P-2

RAI 1: The American Society of Mechanical Engineers Code for Operation and Maintenance (OM Code) Edition 2001 thru 2003 Addenda, Subsection ISTB, requires that all pumps be categorized as either Group A or Group B. The Standby Liquid Control pumps are normally Group B pumps. ISTB only requires that Group B pump vibration be measured during comprehensive pump testing every 2 years. The licensee is measuring vibration quarterly without addressing Group A, Group B, or comprehensive pump tests. Please explain and clarify.

RAI 2: In the section entitled "Reason for Request," the licensee does not provide the reasoning for not using a vibration measuring transducer that meets the OM Code specified requirements. The availability of instruments to cover the range from 2 Hz through 1000 Hz might have been impractical a decade ago, however, these instruments are readily available from several vendors today. Please discuss your reasons for determining the impracticality of meeting this OM Code requirement today.

RAI 3: In the section entitled "Reason for Request," Item 1 on page 7-3, states "Vibration monitoring equipment with a calibration accuracy of at least ± 5% over a frequency response range of # **5 Hz to\$ 1,000 Hz** will be utilized for IST [Inservice Testing]OM Code Edition 2001 thru 2003 Addenda, Subsection ISTB." This does not provide any range. Please specify the actual range of the instruments being used to measure vibration.

RAI 4: In the section entitled "Reason for Request," please clarify Item 7 on page 7-3a.

Pump Relief Request RR-P-3

<u>RAI 5</u>: The OM Code Edition 2001 thru 2003 Addenda, Subsection ISTB requires that all pumps be categorized as either Group A or Group B. The Residual Heat Removal (RHR) pumps are

Group A pumps. The Table ISTB-3500-1 required pressure instrument accuracy for Group A is ± 2 percent and for Comprehensive Pump Test is $\pm \frac{1}{2}$ percent, whereas the licensee instrument accuracy is identified as ± 2 percent. Please explain and clarify.

Pump Relief Request RR-P-6

RAI 6: The OM Code Edition 2001 thru 2003 Addenda, Subsection ISTB requires that all pumps be categorized as either Group A or Group B. The core spray pumps are normally Group B pumps. Under "Requirement" and "Reason for Request," the licensee states the pumps are identified as Group A pump. Please explain and clarify.

Pump Relief Request RR-P-7

RAI 7: The OM Code Edition 2001 thru 2003 Addenda, Subsection ISTB requires that all pumps be categorized as either Group A or Group B. Under "Reason for Request," these pumps are stated as Group A pumps. High Pressure Coolant Injection (HPCI) pumps are Group B pumps. The Table ISTB-3500-1 required pressure instrument accuracy for Group B is \pm 2 percent and for Comprehensive Pump test is \pm ½ percent, whereas the licensee instrument accuracy is identified as \pm 2 percent. Please explain and clarify.

Pump Relief Request RR-P-8

RAI 8: The OM Code Edition 2001 thru 2003 Addenda, Subsection ISTB requires that all pumps to be categorized as either Group A or Group B. Under "Requirement" and "Proposed Alternative and Basis," these pumps are identified as Group A pumps. HPCI pumps are normally Group B pumps. Please explain and clarify.

Pump Relief Request RR-P-10

RAI 9: The OM Code Edition 2001 thru 2003 Addenda, Subsection ISTB, requires that all pumps be categorized as either Group A or Group B. HPCI pumps are normally Group B pumps. Group B pumps vibration are measured during comprehensive pump testing. Please provide details which test is being performed and also provide historical data of the HPCI pump vibration data.

Pump Relief Request RR-P-11

RAI 10: The OM Code Edition 2001 thru 2003 Addenda, Subsection ISTB, requires that all pumps to be categorized as either Group A or Group B. The RHR pumps are Group A and Core Spray pumps are Group B pumps. The Table ISTB-3500-1 required pressure instrument accuracy for Group A and Group B is \pm 2 percent and for Comprehensive Pump test is \pm ½ percent, whereas the licensee instrument accuracy is identified as \pm 2 percent accuracy. Please explain and clarify.

Pump Relief Request RR-P-12

RAI 11: The OM Code Edition 2001 thru 2003 Addenda, Subsection ISTB, requires that all pumps be categorized as either Group A or Group B. On Page 7-2f, the Standby Diesel

Service Water pump 2P41-C002 is identified as a Group A pump, whereas actually it is a Group B pump. Please explain and clarify.

Relief requests RR-V-6 and RR-V-7

RAI 12: OM Code Edition 2001 thru 2003 Addenda, Subsection ISTB requires that check valves in a sample disassembly program that are not capable of being full-stroke exercised, have failed, or have unacceptably degraded valve internals shall have the cause of failure analyzed and the condition corrected and that other check valves in the sample group that may also be affected by this failure mechanism be examined or tested during the same refueling outage to determine the condition of internal components and their ability to function. Please address how this OM Code requirement will be implemented for valve groups that are inspected outside of refueling outages during normal operation.

RAI 13: Please verify that check valve inspections will be conducted on a refueling outage frequency (i.e., presently every 24 months).

RAI 14: Relief request RR-V-6 states that the alternative is a resubmittal of previously approved relief request RR-V-17. Valves 1/2E41-F019, 1/2P41-F064, and 1/2P41-F065 are relatively large diameter valves and were not previously approved in RR-V-17. The NRC safety evaluation associated with RR-V-17 denied relief for similar large diameter check valves due to concerns about the leaktight reliability of the associated isolation valves. Please address the isolation capability and leakage determination capability available prior to disassembly of the above valves.

RAI 15: Please confirm that the information contained in your response to request for additional information associated with RR-V-18 (Southern Nuclear Operating Company letter dated September 12, 2003) is still accurate for the fourth 10-year interval.

Edwin I. Hatch Nuclear Plant, Units 1 & 2

CC:

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