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February 27, 1979

Chas. F. Whiteer Vice President Engineering Georgia Power

Director of Nuclear Reactor Regulation Nuclear Regulatory Commission Washington, D. C. 20555

> NRC DOCKET 50-366 OPERATING LICENSE NPF-5 EDWIN I. HATCH NUCLEAR PLANT UNIT 2 CORE SPRAY SYSTEM OPERABILITY

Gentlemen:

In accordance with the provisions of 10 CFR 50.90, as required by 10 CFR 50.59, Georgia Power Company hereby proposes an amendment to Operating License NPF-5. The proposed amendment consists of a change to the Technical Specifications (Appendix A to the Operating License) to incorporate a change in the Technical Specifications definition of OPERABILITY of the Core Spray System.

The existing Core Spray specification (3.5.3.1) requires an operable core spray pump and an operable flow path from the suppression chamber to the reactor vessel in each loop in order to meet the definition of operability. The proposed change to the Technical Specifications would add an alternate flow path from the condensate storage tank to the reactor vessel to the limiting conditions for operability which would fulfill the operability definition in lieu of the flow path from the suppression chamber. The specification is further modified to allow the alternate flow path only when the reactor is in cold shutdown or refuel modes (conditions 4 and 5) only for the suppress which would have the potential for draining the reactor vessel.

In addition, the Surveillance Requirements specification associated with the Core Spray LCO would also be modified to require verification of valve lineup and filled pipes once per shift rather than once per 31 days when the system is aligned with suction from the condensate storage tank.

The proposed change does not affect the RHR system's capability to operate in the shutdown cooling mode. In addition, several alternate sources of cooling water remain available during the period of time when core spray is aligned to the condensate storage tank. As a result, the Plant Review Board and the Safety Review Board have determined that margins of safety are not reduced because the mode of operation contemplated utilizes the existing core spray system piping and because work which has the potential for draining the reactor vessel will be prohibited during periods utilizing the alternate



Director of Nuclear Reactor Regulation Nuclear Regulatory Commission February 27, 1979 Page 2

flow path. The probability of occurrence or the consequences of an accident or malfunction of equipment important to safety has not been increased and no new accidents or malfunctions have been created. The Review Boards have therefore determined that the proposed change to the Technical Specifications is not an unreviewed safety question.

The proposed change to the Technical Specifications has been evaluated and is determined to be a Category III amendment; a single safety issue is involved - the availability of sources of cooling water to the reactor in conditions 4 and 5 when core spray is aligned to the condensate storage tank. Therefore, a check for \$4,000 is attached. Your early attention to this proposed change is requested.

Yours very truly,

for Whitmer

Chas. F. Whitmer

RDB/mb

Attachment

Sworn to and subscribed before me this 27th day of February, 1979.

Notary Public, Georgia, St. te at Large My Commission Expires Sept. 29, 1981

xc: Ruble A. Thomas George F. Trowbridge, Esquire

ATTACHMENT 1

NRC DOCKET 50-366 OPERATING LICENSE NPF-5 EDWIN I. HATCH NUCLEAR PLANT UNIT 2 PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS

Pursuant to 10 CFR 170.12 (c), Georgia Power Company has evaluated the attached proposed amendment to Operating License NPF-5 and have determined that:

- a) The proposed amendment does not require the evaluation of a new Safety Analysis Report or rewrite of the facility license;
- b) The proposed amendment does not contain several complex issues, does not involve ACRS review, or does not require an environmental impact statement;
- c) The proposed amendment does not involve a complex issue, an environmental issue or more than one safety issue;
- d) The proposed amendment does involve a single issue; namely, it adds another condition when the Core Spray System can be considered operable.
- e) The proposed amendment is therefore a Class III amendment.

ATTACHMENT 2

NRC DOCKET 50-366 OPERATING LICENSE NPF-5 EDWIN I. HATCH NUCLEAR PLANT UNIT 2 PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS

The proposed change to the Technical Specifications (Appendix A to Operating License NPF-5 would be incorporated as follows:

Remove Page	Insert Page
3/4 5-4	3/4 5-4
3/4 5-5	3/4 5-5

EMERGENCY CORE COOLING SYSTEMS

3/4.5.3 LOW PRESSURE CORE COOLING SYSTEMS

CORE SPRAY SYSTEM

LIMITING CONDITION FOR OPERATION

3.5.3.1 Two independent Core Spray System (CSS) subsystems shall be OPERABLE with each subsystem comprised of:

- a. One OPERABLE CSS pump, and
- b. An OPERABLE flow path capable of taking suction from the suppression chamber and transferring the water through the spray sparger to the reactor vessel, or
- c.** An OPERABLE flow path capable of taking suction from the condensate storage tank and transferring the water through the spray sparger to the reactor vessel.

APPLICABILITY: CONDITIONS 1, 2, 3, 4, and 5*.

ACTION:

- a. In CONDITION 1, 2 or 3;
 - With one CSS subsystem inoperable, POWER OPERATION may continue provided both LPCI subsystems are OPERABLE; restore the inoperable CSS subsystem to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
 - With both CSS subsystems inoperable, be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the next 24 hours.
 - 3. In the event the CSS is actuated and injects water into the reactor coolant system, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 90 days describing the circumstances of the actuation and the total accumulated actuation cycles to date.

HATCH - UNIT 2

^{*} The core spray system and the suppression chamber are not required to be OPERABLE provided that the reactor vessel head is removed and the cavity is flooded, the spent fuel pool gates are removed, and the water level is maintained within the limits of Specificatin 3.9.9 and 3.9.10.

^{**}The Core Spray System shall be aligned to the condensate storage tank only
for the purpose of draining the suppression chamber in CONDITIONS 4 or 5,
provided that no work is being done which has the potential for draining
the reactor vessel.

EMERGENCY CORE COOLING SYSTEMS

LIMITING CONDITION FOR OPERATION (Continued)

ACTION (Continued)

- b. In CONDITION 4 or 5*;
 - With one CSS subsystem inoperable, operation may continue provided that at least one LPCI subsystem is OPERABLE within 4 hours; otherwise, suspend all operations that have a potential for draining the reactor vessel.
 - 2. With both CSS subsystems inoperable, operation may continue provided that at least one LPCI subsystem is OPERABLE and both LPCI subsystems are OPERABLE within 4 hours. Otherwise, suspend all operations that have a potential for draining the reactor vessel and verify that at least one LPCI subsystem is OPERABLE within 4 hours.
 - 3. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

- 4.5.3.1 Each CSS subsystem shall be demonsteated OPERABLE:
 - a. At least once per 31 days*** by:
 - Verifying that the system piping from the pump discharge valve to the system isolation valve is filled with water, and
 - Verifying that each valve (manual, power operated, or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position.
 - b. At least once per 92 days by:
 - Verifying that each CSS pump can be started from the control room and develops a flow of at least 4625 gpm on recirculation flow against a system head corresponding to a reactor vessel pressure of > 113 psig, and

***Once per shift when the Core Spray System is aligned to the condensate
 storage tank.