

Georgia Power Company  
333 Piedmont Avenue  
Atlanta, Georgia 30308  
Telephone 404 526-3195

Mailing Address:  
40 Inverness Center Parkway  
Post Office Box 1295  
Birmingham, Alabama 35201  
Telephone 205 868-5581

*the southern electric system*

W. G. Hairston, III  
Senior Vice President  
Nuclear Operations

January 15, 1990

ELV-01140  
0158

Docket Nos. 50-424  
50-425

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

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT  
REQUEST TO REVISE TECHNICAL SPECIFICATION 4.0.2

In accordance with the provisions of 10 CFR 50.90 and 10 CFR 50.59, Georgia Power Company (GPC) hereby proposes to amend the Vogtle Electric Generating Plant (VEGP) Unit 1 and Unit 2 Technical Specifications, Appendix A to Operating Licenses NPF-68 and NPF-81.

The proposed amendment would revise Technical Specification 4.0.2 by deleting the requirement that the combined time interval for any three consecutive surveillance intervals is not to exceed 3.25 times the specified surveillance interval. The proposed change is based on the guidance of Generic Letter 89-14, "Line-Item Improvements in Technical Specifications - Removal of the 3.25 Limit on Extending Surveillance Intervals."

GPC requests approval of the proposed amendment by July 31, 1990. While the proposed change is not required to address an immediate safety concern, GPC concurs with Generic Letter 89-14 in that removal of the 3.25 limit will result in a safety benefit by providing for flexibility in scheduling of surveillance activities when plant conditions are conducive to the safe conduct of a surveillance. Additionally, removal of the limit reduces the potential for unnecessary forced shutdowns to perform surveillance activities. The first Unit 2 refueling outage is scheduled for September, 1990. Approval of the proposed amendment by July 31, 1990 will allow ample time for implementation of this additional flexibility for the upcoming Unit 2 outage.

In accordance with 10 CFR 50.91, the designated state official will be sent a copy of this letter and all enclosures.

9001230305 900115  
PDR ADLOCK 05000424  
P PDC

A001  
1/1

U. S. Nuclear Regulatory Commission  
ELV-01140  
Page Two

Mr. W. G. Hairston, III states that he is a Senior Vice President of Georgia Power Company and is authorized to execute this oath on behalf of Georgia Power Company and that, to the best of his knowledge and belief, the facts set forth in this letter and enclosures are true.

GEORGIA POWER COMPANY

By: W. G. Hairston, III  
W. G. Hairston, III

Sworn to and subscribed before me this 15<sup>th</sup> day of January, 1990.

Sherry Ann Mitchell  
Notary Public

MY COMMISSION EXPIRES DEC. 15, 1992

Enclosures:

1. Basis for Proposed Change
2. 10 CFR 50.92 Evaluation
3. Instructions for Incorporation

c(w): Georgia Power Company  
Mr. C. K. McCoy  
Mr. G. Bockhold, Jr.  
Mr. P. D. Rushton  
Mr. R. M. Odom  
NORMS

U. S. Nuclear Regulatory Commission  
Mr. S. D. Ebner, Regional Administrator  
Mr. J. B. Hopkins, Licensing Project Manager, NRR  
Mr. J. F. Rogge, Senior Resident Inspector, Vogtle

State of Georgia  
Mr. J. L. Ledbetter, Commissioner, Department of Natural Resources

ENCLOSURE 1

VOGTLE ELECTRIC GENERATING PLANT  
REQUEST TO REVISE TECHNICAL SPECIFICATION 4.0.2

BASIS FOR PROPOSED CHANGE

Proposed Change

The Vogtle Unit 1 and Unit 2 Technical Specification (TS) 4.0.2 is proposed to be revised as follows:

1. Delete the requirement that the combined time interval for any three consecutive surveillance intervals shall not exceed 3.25 times the specified surveillance interval.
2. Revise the associated TS Bases accordingly.

Basis

Specification 4.0.2 permits surveillance intervals to be extended up to 25 percent of the specified interval. This extension facilitates the scheduling of surveillance activities and allows surveillances to be postponed when plant conditions are not suitable for conducting a surveillance. Specification 4.0.2 also limits the extension of surveillance intervals to the extent that the combined time interval for any three consecutive surveillance intervals may not exceed 3.25 times the specified surveillance interval.

However, on August 21, 1989, the NRC issued Generic Letter 89-14, "Line-Item Improvements in Technical Specifications-Removal of the 3.25 Limit on Extending Surveillance Intervals." In this letter, the NRC staff noted that they have routinely granted requests for one-time exceptions to the 3.25 limit to accommodate variations in the length of a fuel cycle. While the 25 percent allowance is usually sufficient to accommodate variations in cycle length, the more common occurrence has been to encounter the 3.25 limit on the combined time interval for three consecutive surveillances. The basis for these exceptions was that the risk to safety due to the extension of these surveillances was low in contrast to the alternative of a forced shutdown to perform surveillance. Furthermore, the NRC staff concluded that the elimination of this limit for surveillances that are performed on a routine basis during plant operation would also result in a significant safety benefit. The flexibility to schedule surveillances so that conditions not suitable for performing these surveillances can be avoided outweighs any benefit derived by limiting three consecutive surveillance intervals to the 3.25 limit.

GPC concurs with the conclusions of Generic Letter 89-14. Accordingly, the proposed change is consistent with the guidance found therein.

## ENCLOSURE 2

### VOGTLE ELECTRIC GENERATING PLANT REQUEST TO REVISE TECHNICAL SPECIFICATION 4.0.2

#### 10 CFR 50.92 EVALUATION

Pursuant to 10 CFR 50.92, GPC has evaluated the proposed amendment and has determined that operation of the facility in accordance with the proposed amendment would not involve a significant hazards consideration. The basis for this determination is as follows:

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated. The surveillance intervals will continue to be constrained by the 25 percent limit. The risk associated with exceeding the 3.25 limit is outweighed by the risk associated with a forced shutdown to perform surveillances which would normally be performed during a refueling outage. In addition, for those surveillances which are routinely performed during plant operation, the flexibility to schedule surveillances to avoid plant conditions which are not conducive to surveillances represents a positive safety benefit. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.
2. The proposed change will not create the possibility of a new or different kind of accident from any previously evaluated. The proposed change would not result in any physical alteration to any plant system, nor would there be a change in the method in which any safety related system performed its function. The change would not result in any equipment being operated in a manner different than that in which it was designed to be operated.
3. The proposed change does not involve a significant reduction in a margin of safety. Deletion of the 3.25 limit will not significantly affect equipment reliability, rather it will reduce the potential for interrupting normal plant operation due to surveillance scheduling. Surveillance intervals will continue to be constrained by the 25 percent limit. The added flexibility in scheduling surveillances afforded by deletion of the 3.25 limit should have a positive safety benefit by allowing surveillances to be performed under appropriate plant conditions.

Based on the preceding analysis, GPC has determined that the proposed change to the Technical Specifications will not significantly increase the probability or consequences of an accident previously evaluated, create the possibility of a new or different kind of accident from any accident previously evaluated, or involve a significant reduction in a margin of safety. GPC therefore concludes that the proposed change meets the requirements of 10 CFR 50.92(c) and does not involve a significant hazards consideration.