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the southern electric system

August 28, 1981

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Vice President and General Manager
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Director of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
EDWIN I. HATCH NUCLEAR PLANT UNITS 1, 2
COMMON WATER LEVEL REFERENCE - II.K.3.27

GENTLEMEN:

A generic report entitled "Common Water Reference," transmitted as Enclosure 13 to our December 31, 1980 letter, proposed that a Reactor Pressure Vessel (RPV) level indication system, as was then installed at Plant Hatch, adequately addressed the concern stated in item II.K.3.27 of NUREG-0737. By an April 6, 1981 letter, Darrell G. Eisenhut advised the members of the BWR Owners Group that the NRC staff had concluded that the generic report did not justify that reference level design. Our June 9, 1981 letter proposed a revised design employing dual scales to address the concerns of human factors engineering. Through telephone conversations with Mr. Morton B. Fairtile, NRC Project Manager for Plant Hatch, and members of the NRC technical staff, it was disclosed that the revised design as proposed by our June 9, 1981 letter was acceptable only as an interim solution to the concerns of item II.K.3.27. Further, it was stated that it was the conclusion of the Safety Evaluation performed by the NRC staff that only a single reference point for all level instrumentation would adequately address the requirements of NUREG-0737. While we still believe that the original design as described in the generic report is fully adequate, we herein submit our plans to comply with the conclusions of that Safety Evaluation on the question of RPV water level reference point.

The scales on indicators and recorders which were previously referenced to the vessel bottom head invert will be revised to reference "Instrument Zero." These are the fuel zone instruments and the shutdown range instruments. Attached are photographs and drawings illustrating the instruments' present location and appearance. After revision, the scales of instruments 2B21-R605, 2B21-R610, 2B21-R615 and 2B21-R623A, B (similar instrumentation on Unit 1 with the exception of 2B21-R623) will be altered to reflect the common reference point--"Instrument Zero" at 517 inches above the vessel bottom head invert. Spacing of marks and numbers will remain the same with the value of the numbers changed to reflect the new instrument reference zero, with the exception of the scale on 2B21-R615 on Unit 2, which will be marked at 5 inch increments vice 3 inch in accordance with the NRC's evaluation.

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Various operating and calibration procedures will be revised to correct any specific numbers referenced to reflect the change in reference point. The estimated date of completion of these revisions of scales, procedures, and operator training is March 1, 1982. It is our belief, as supported by the expressed opinion of the NRC staff, that the present system of indication is adequate during the interim six-month period.

If you require further information, please contact us.

Yours very truly,

J. T. Beckham, Jr.

WEB/mb

Enclosure

xc: M. Manry
R. F. Rogers, III

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TABLE 1

REVISED UNIT 2 INSTRUMENTATION

INSTRUMENT NUMBER	RANGE	SCALE INCREMENTS	SEE ATTACHED FIGURE NUMBER
2C32-R606A,B,C Panel 603	0"-60"	Mark every inch with numbers at 10 inch increments	1,2,3
2B21-R604A,B Panel 603	-150" to 60"	Mark and number every 15 inches	1,3
2C32-R608 Panel 603	0" to 60" Recorder	Mark every inch with numbers at 10 inch increments	2,3
2B21-R605 Panel 602	-17" to +383"	Mark every 10 inches with numbers at 100 inch increments	4,5
2B21-R610 Panel 601	-317" to -17"	Mark with number every 30 inches	6
2B21-R615 Panel 601	-317" to -17" Recorder	Mark every 5 inches with numbers at 50 inch increments	6
2B21-R623A,B* Panel 601	-150" to 60" Recorder	Mark every 5 inches with numbers at 50 inch increments. Recorder payer scale is 0-100 inches	6,7

*No Unit 1 instrument like this - otherwise instrumentation the same.

WEB/mb
8/28/81

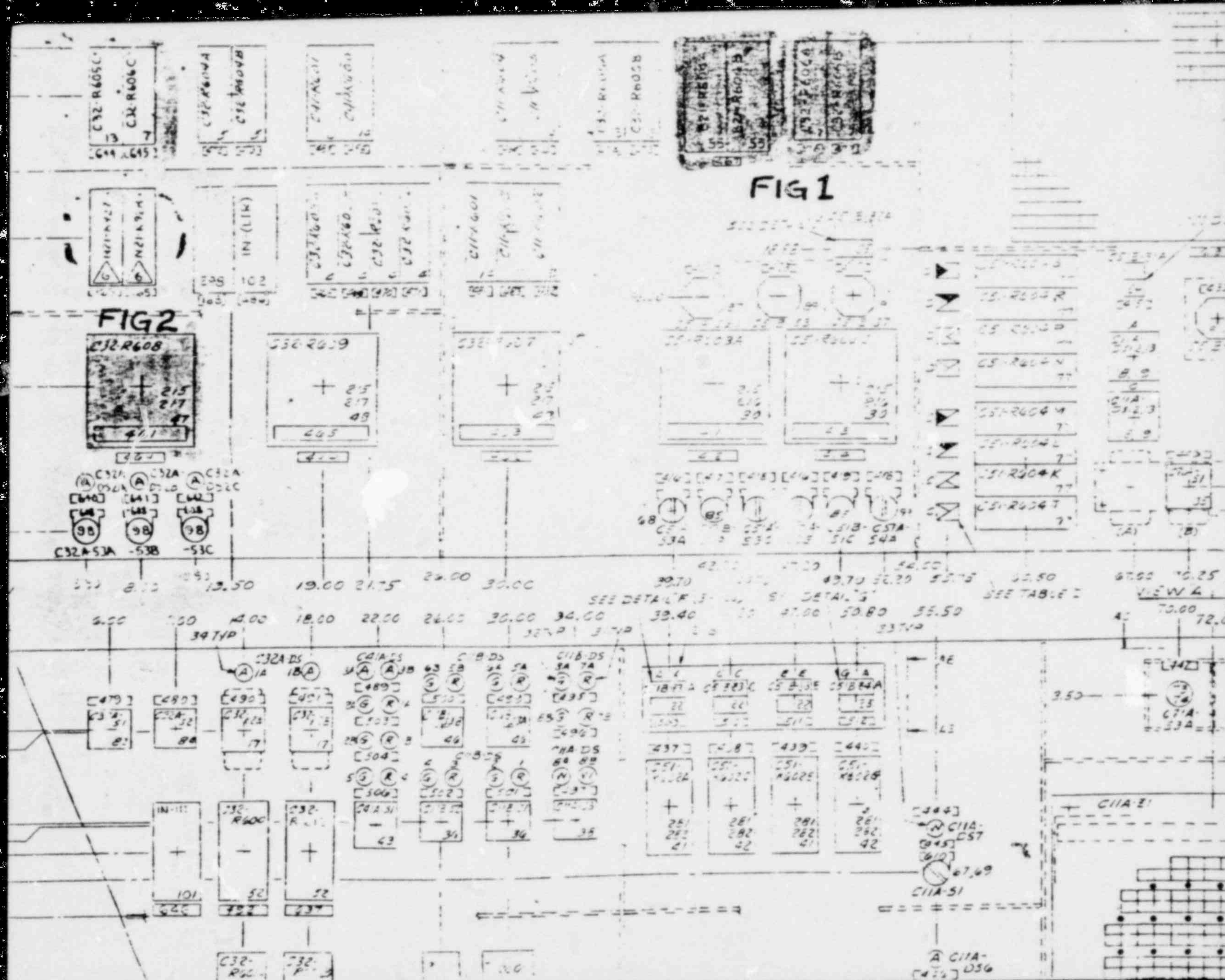


FIG 1
FIG 2
C32-R608
C32-R609
C32-R605C
C32-R606C
IN-(LIK)
C32A-53A
-53B
-53C
C51-R604K
SEE DETAIL "F"
SEE DETAIL "G"
SEE TABLE I
VIEW A
C11A-S1
C11A-E1
C11A-DS6
C11A-DS7
13.50
19.00
21.75
24.00
30.00
6.00
14.00
18.00
22.00
26.00
34.00
38.40
50.80
55.50
72.00

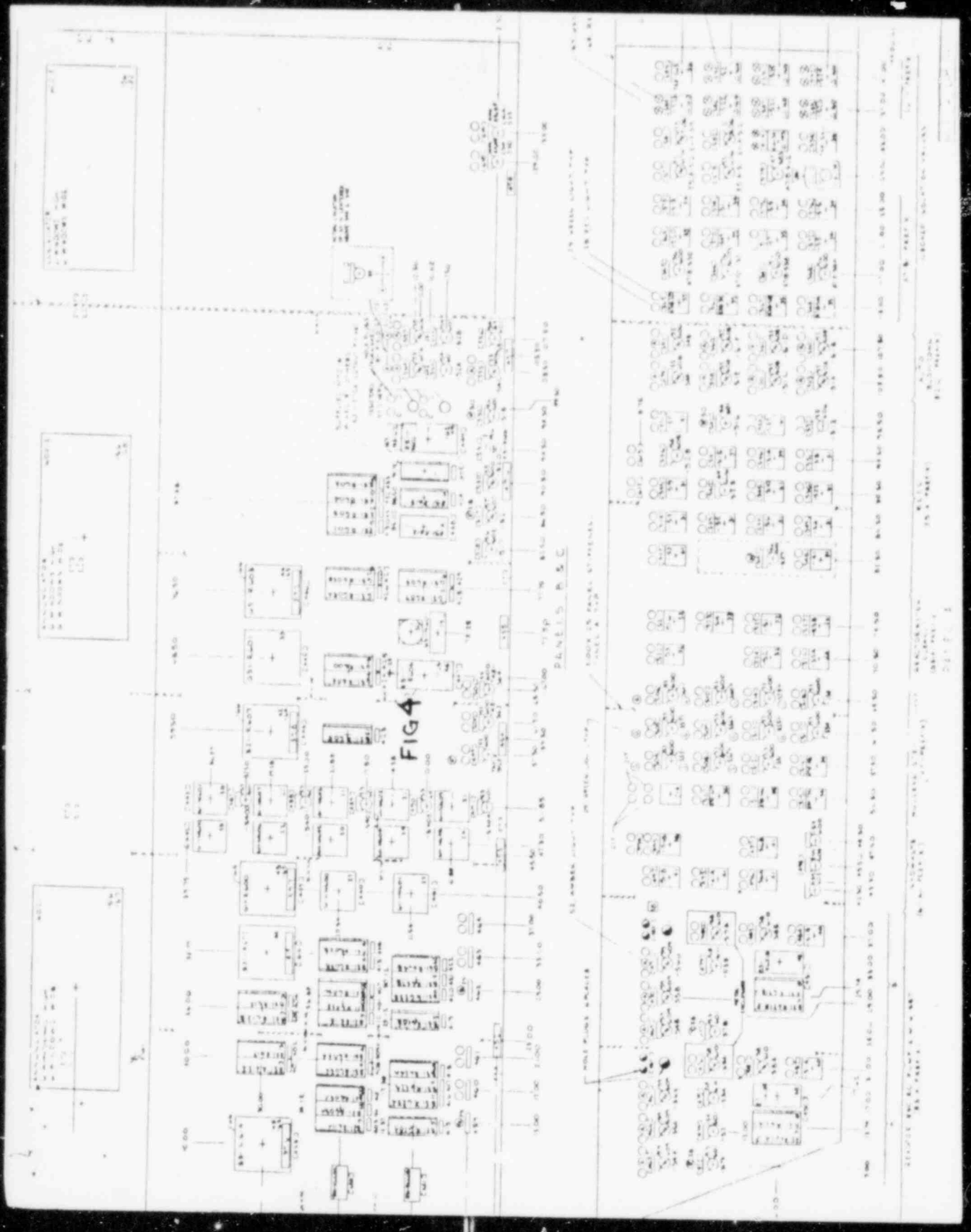


FIG 4

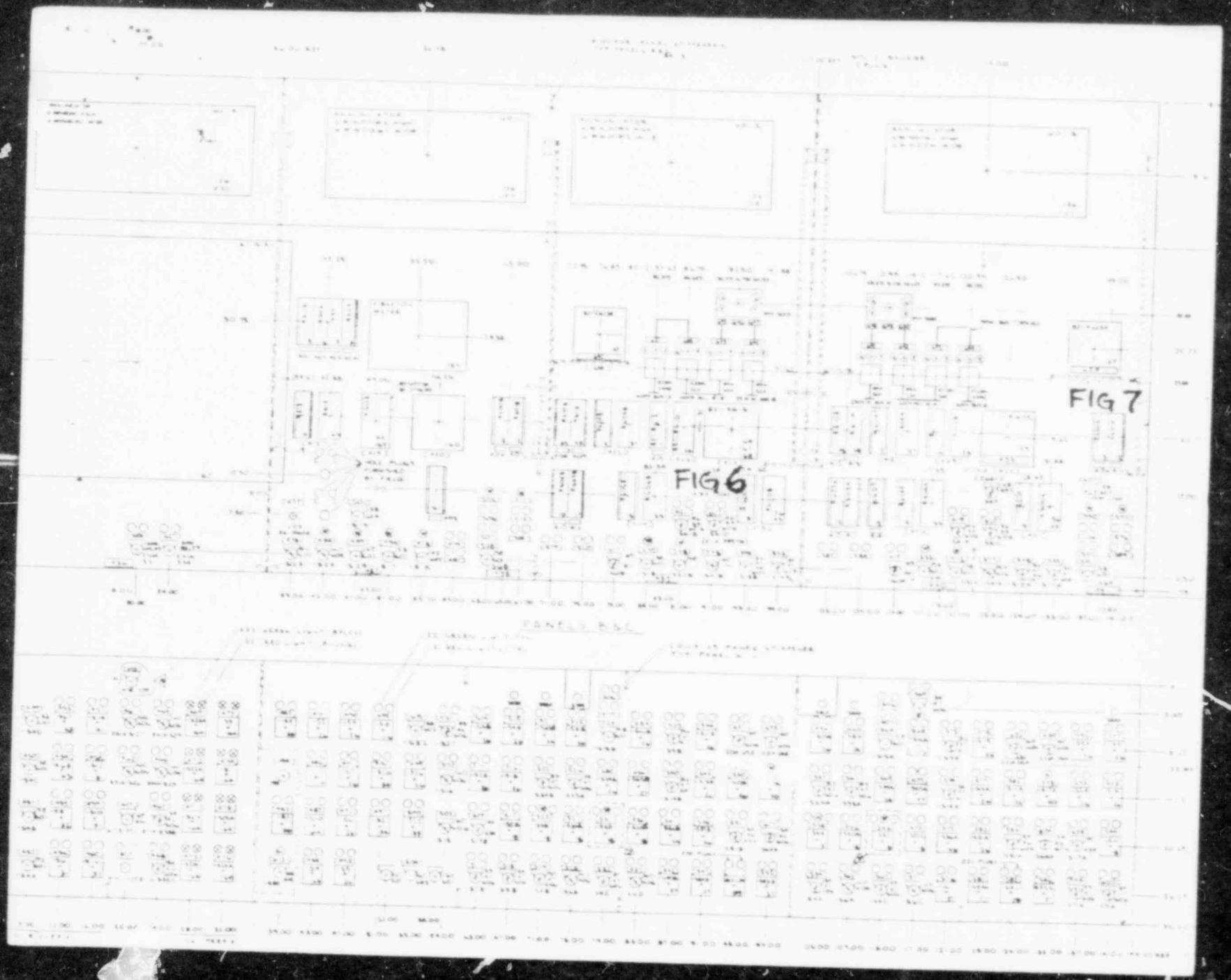


FIG 7
FIG 6

Figure 7
2B21-R623A
Panel 601

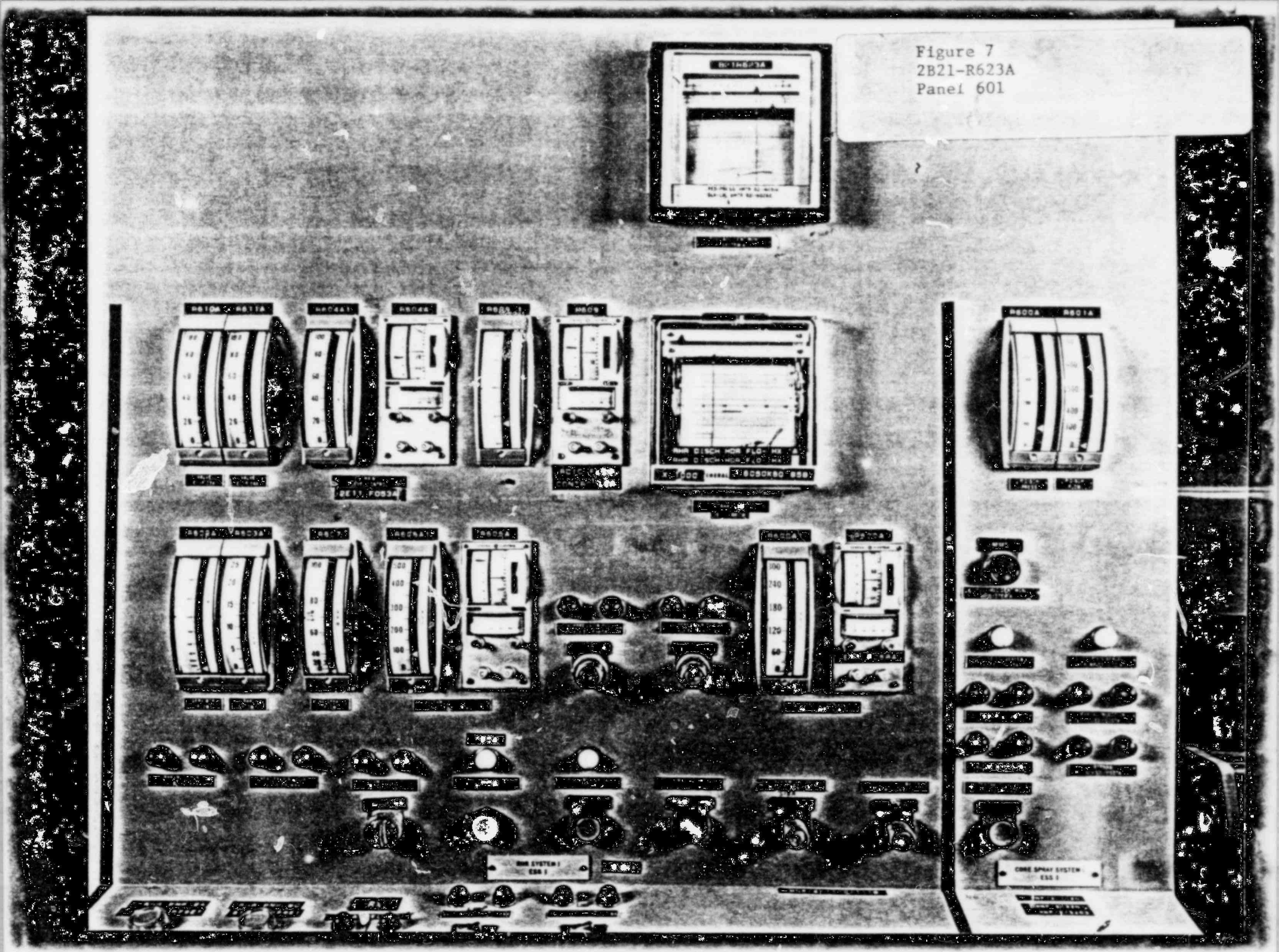
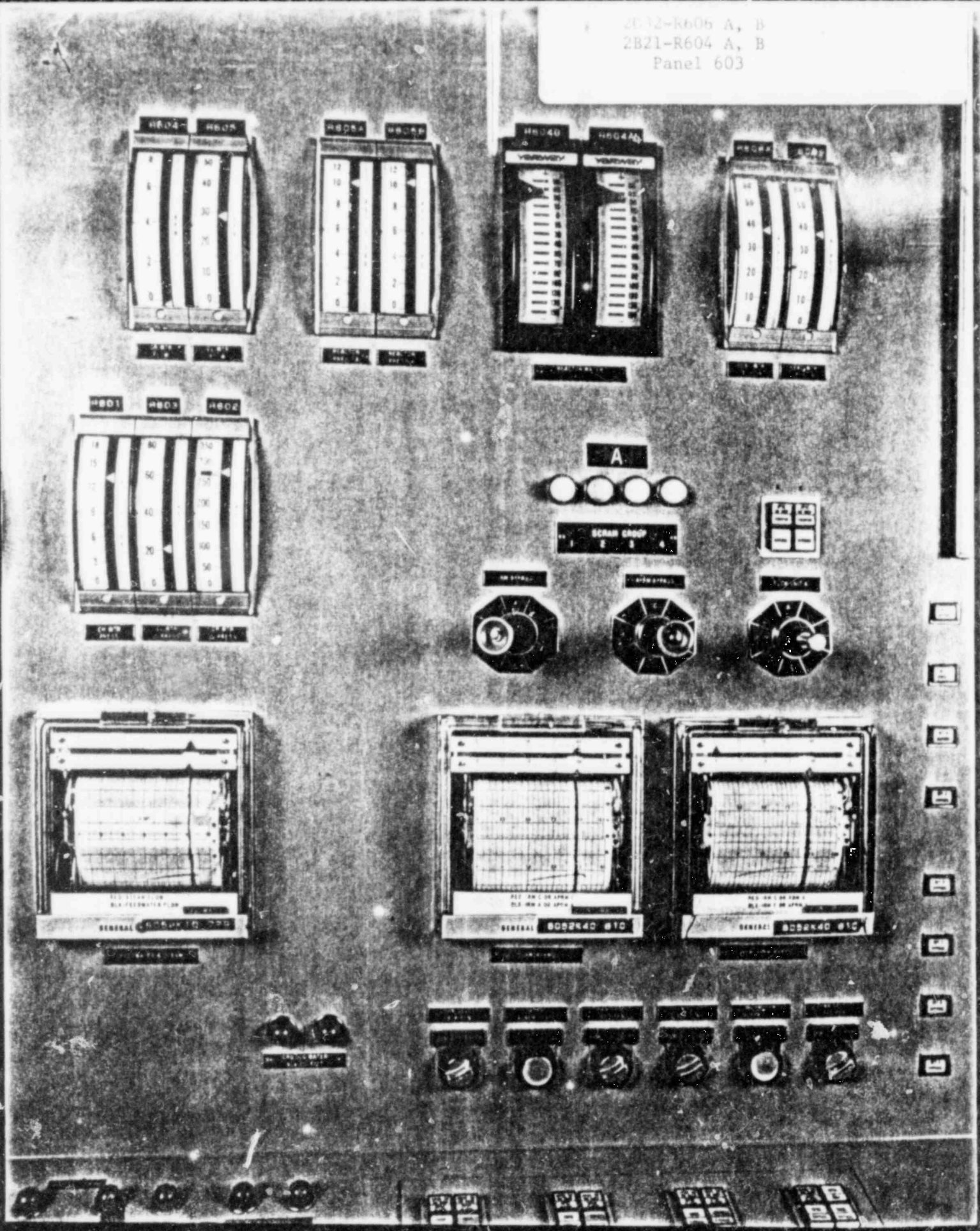


Figure 8
Relative Locations
of Panels

2B32-R606 A, B
2B21-R604 A, B
Panel 603



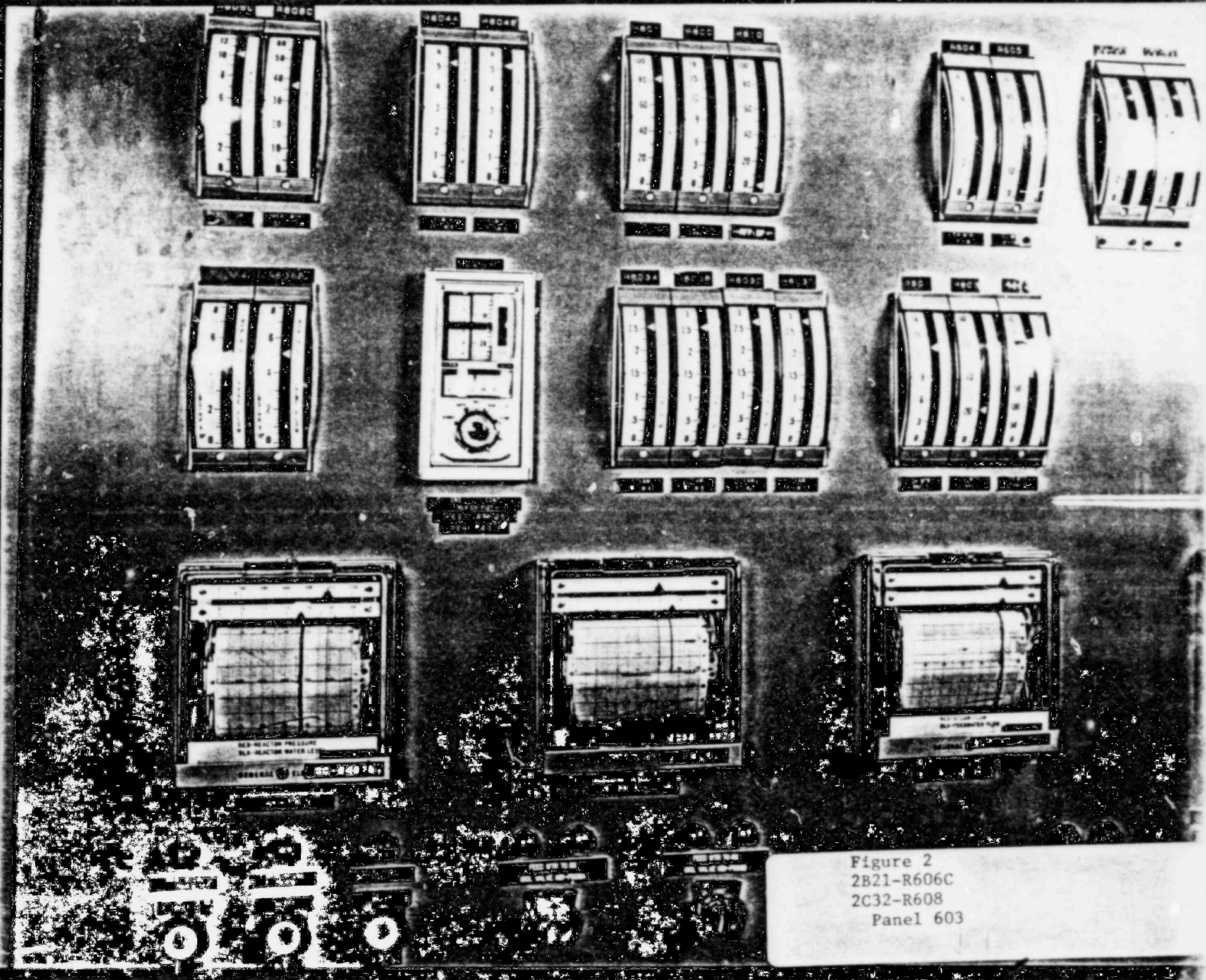


Figure 2
2B21-R606C
2C32-R608
Panel 603

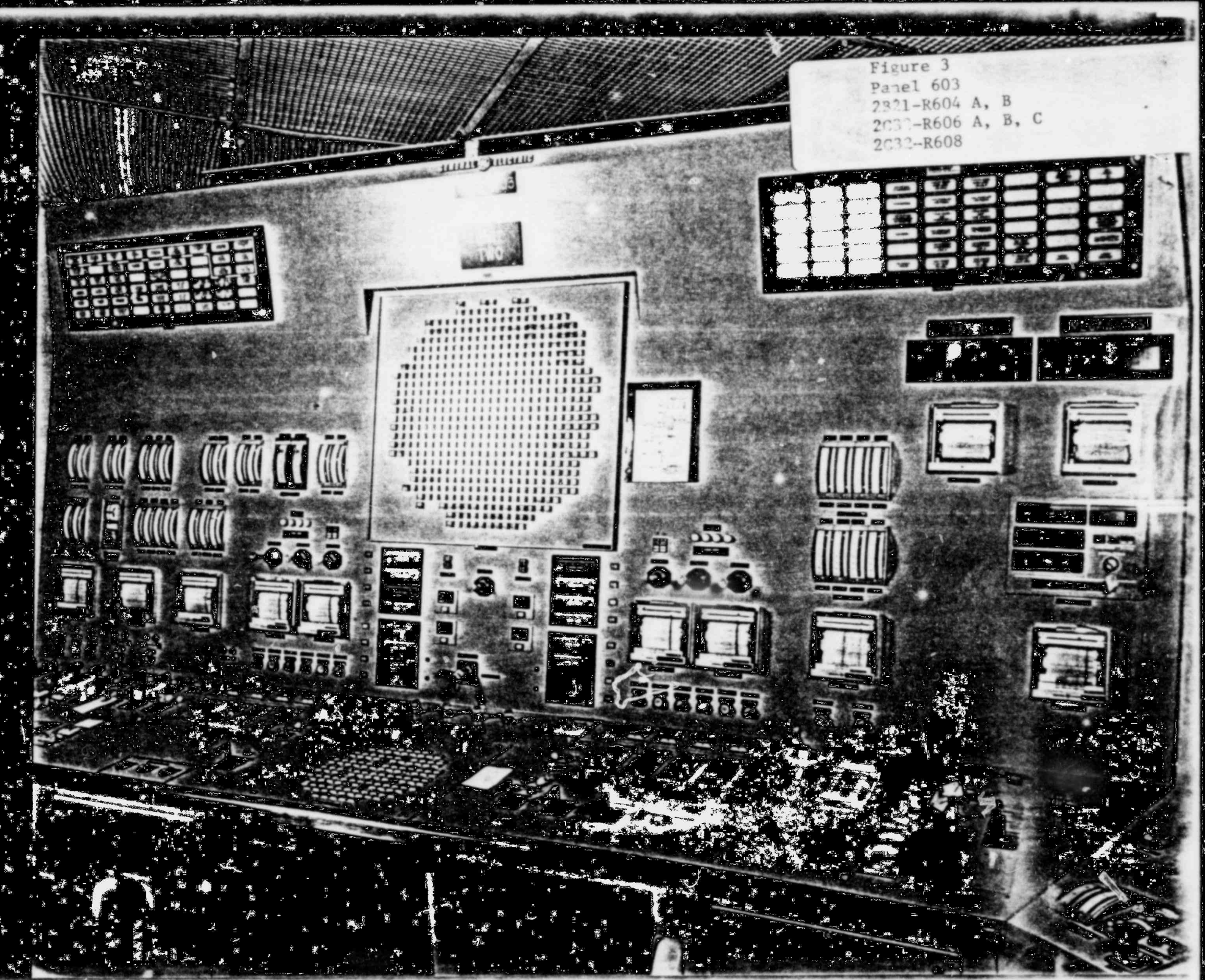
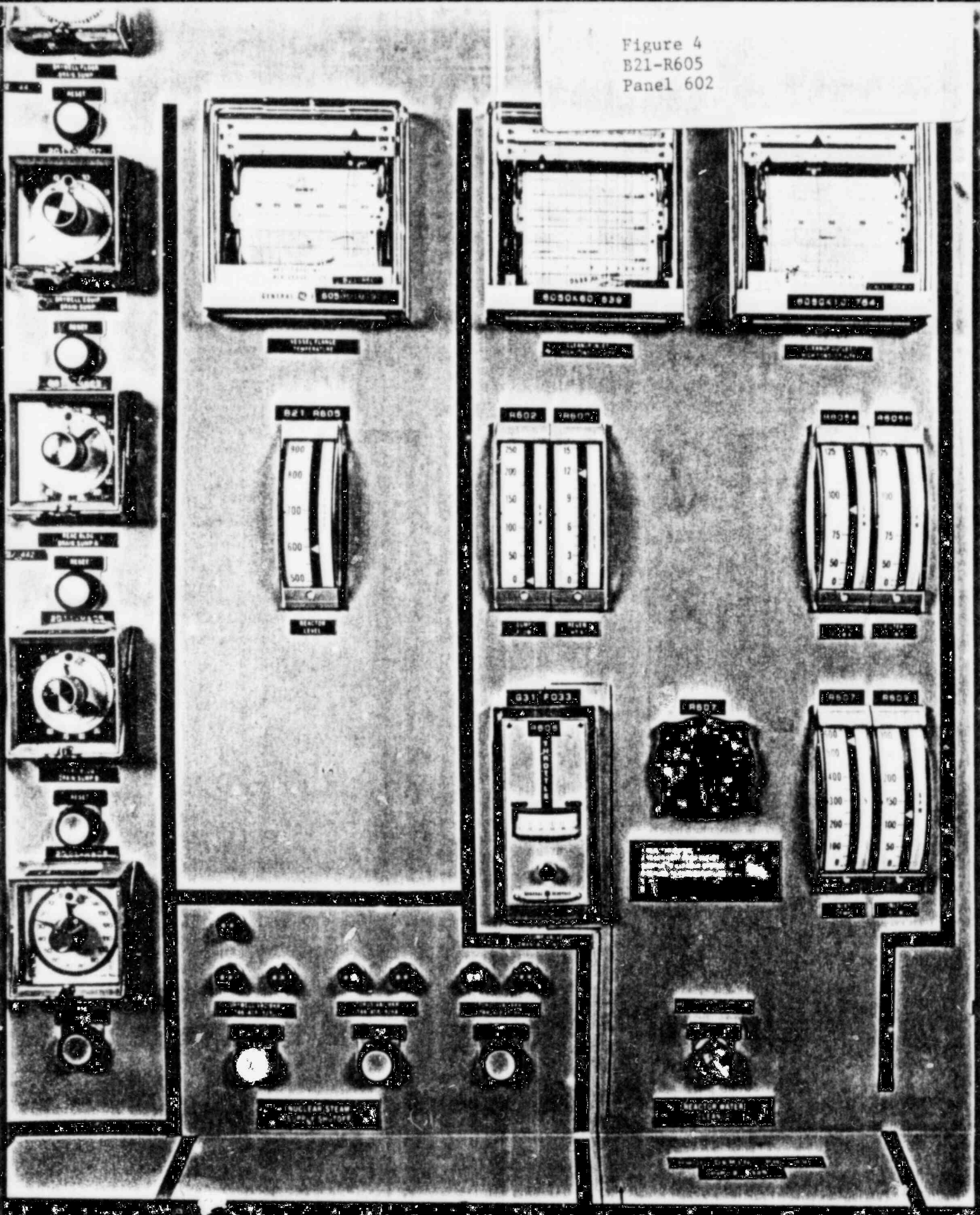


Figure 3
Panel 603
2821-R604 A, B
2832-R606 A, B, C
2832-R608

Figure 4
B21-R605
Panel 602



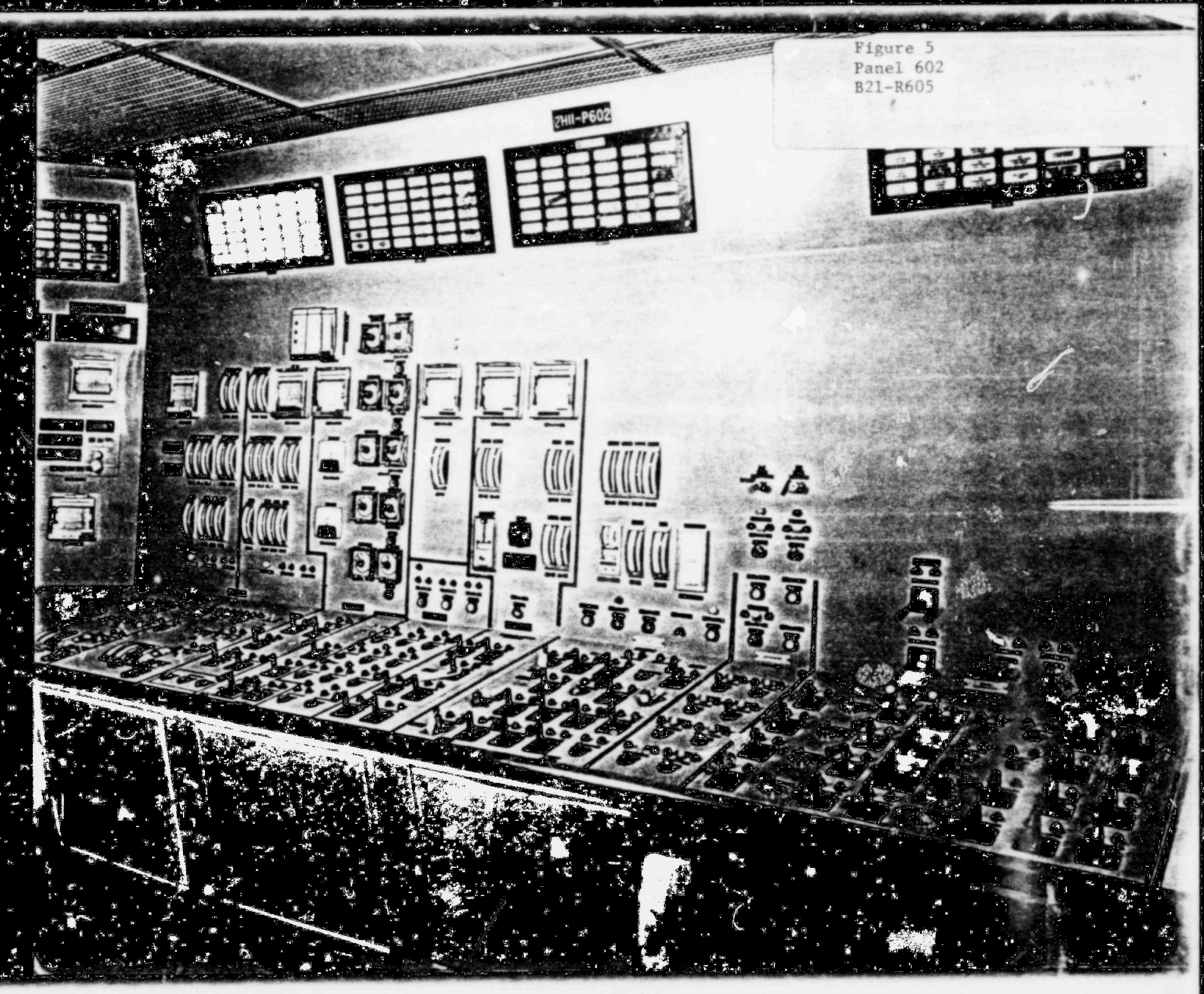


Figure 5
Panel 602
B21-R605

Figure 6
2B21-R623B
2B21-R610
2B21-R615
Panel 601

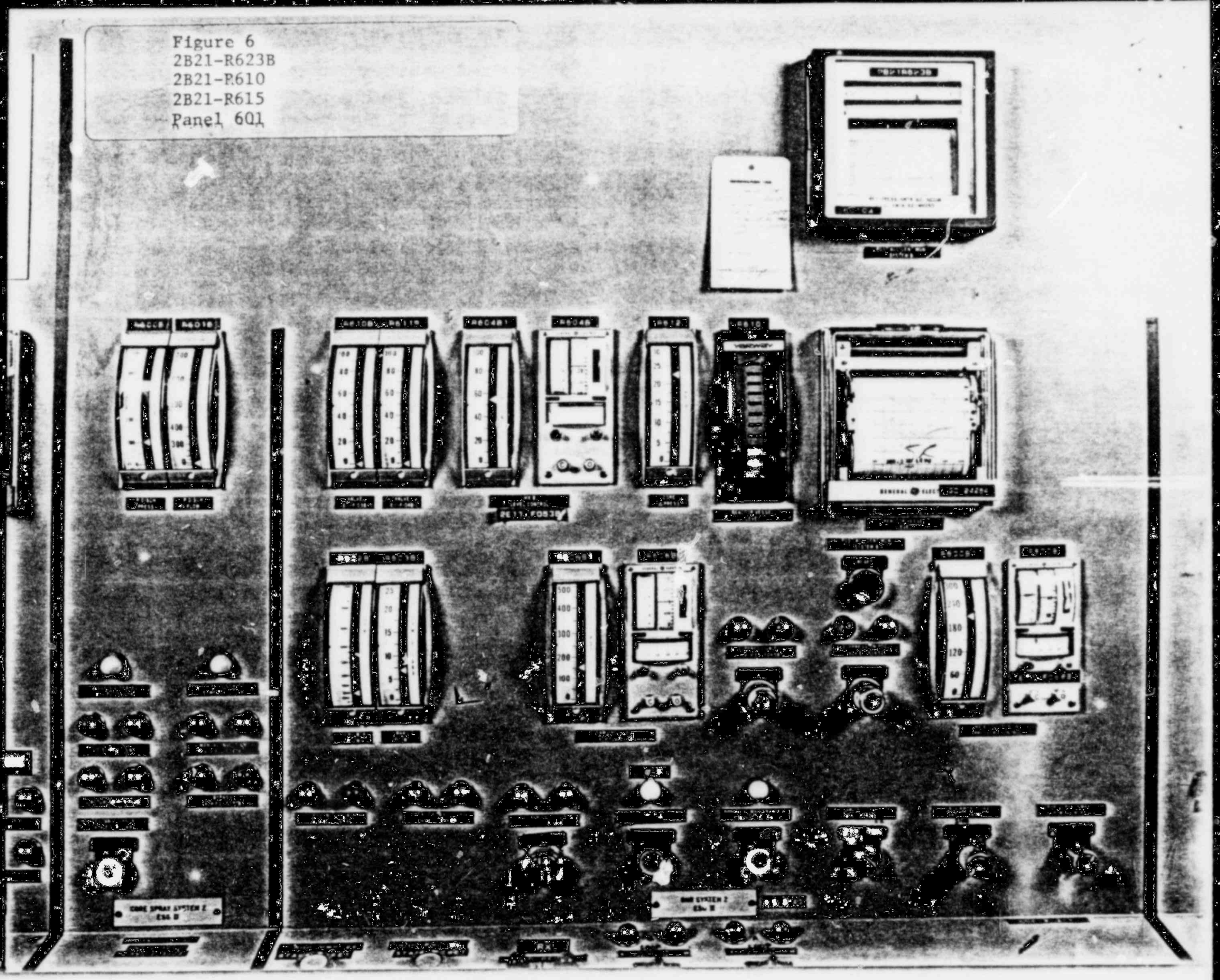
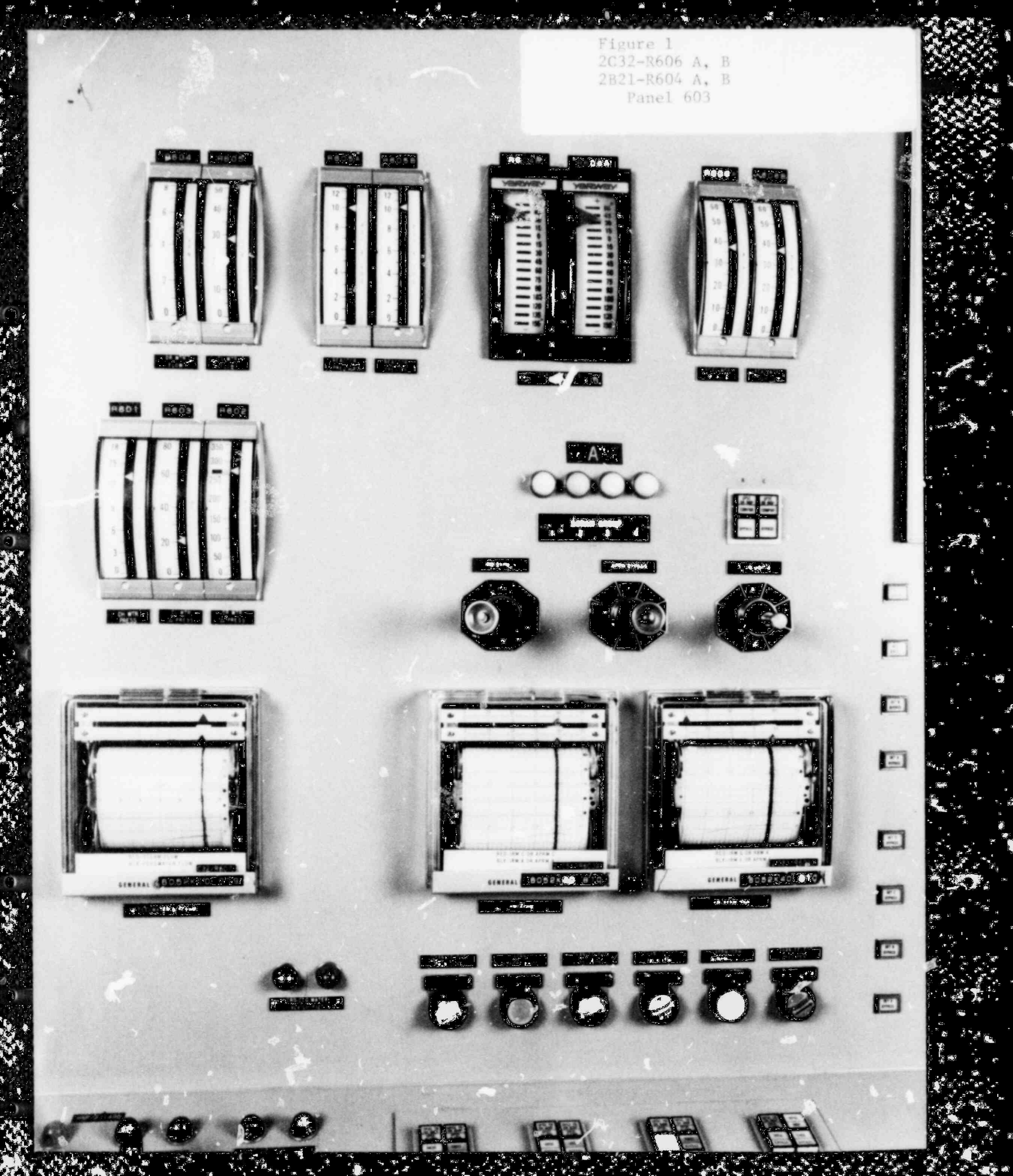


Figure 1
2C32-R606 A, B
2B21-R604 A, B
Panel 603



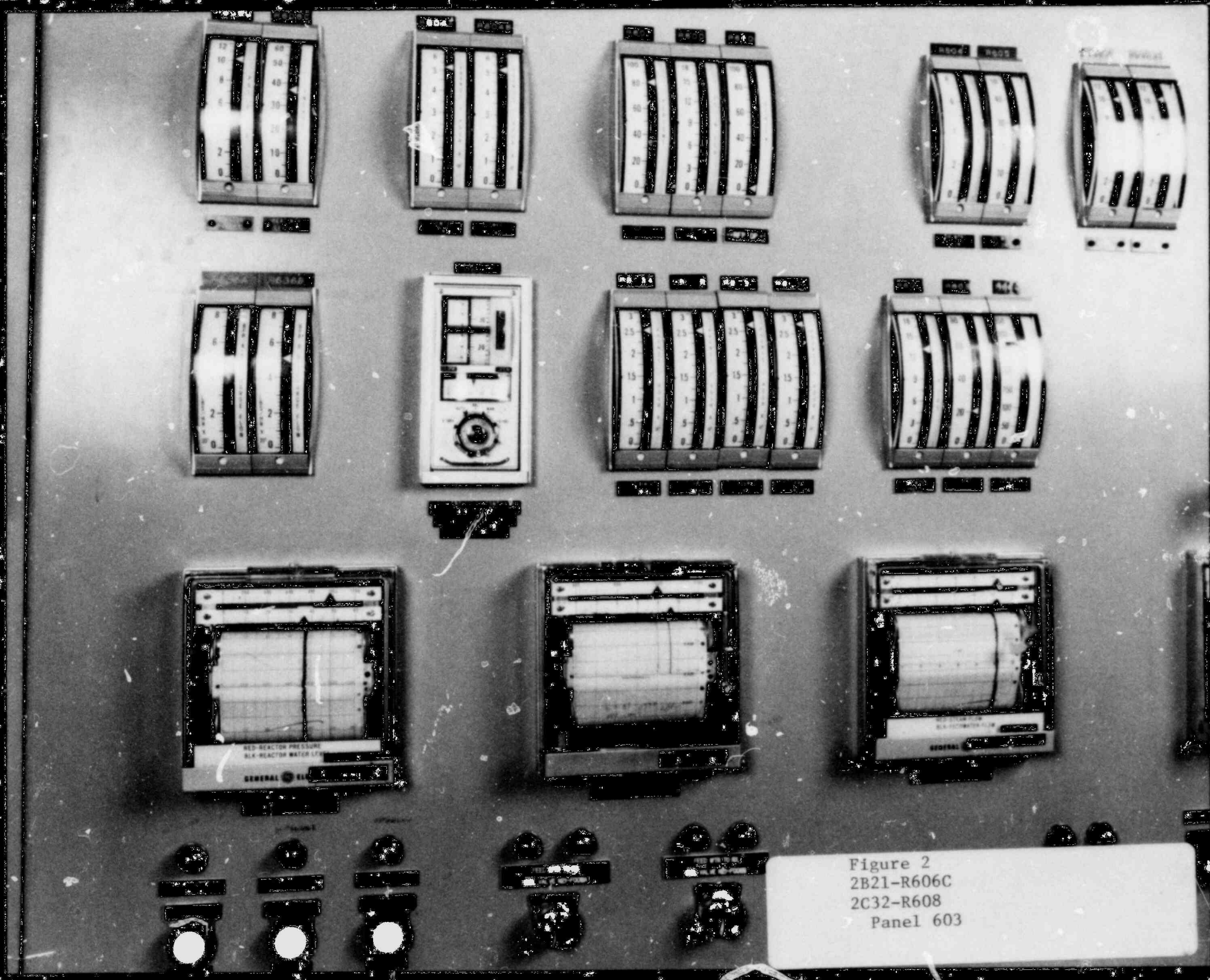


Figure 2
2B21-R606C
2C32-R608
Panel 603

Figure 3
Panel 603
R603-R604 A, B
R605-R606 A, B, C
R607-R608

Figure 4
B21-R605
Panel 602

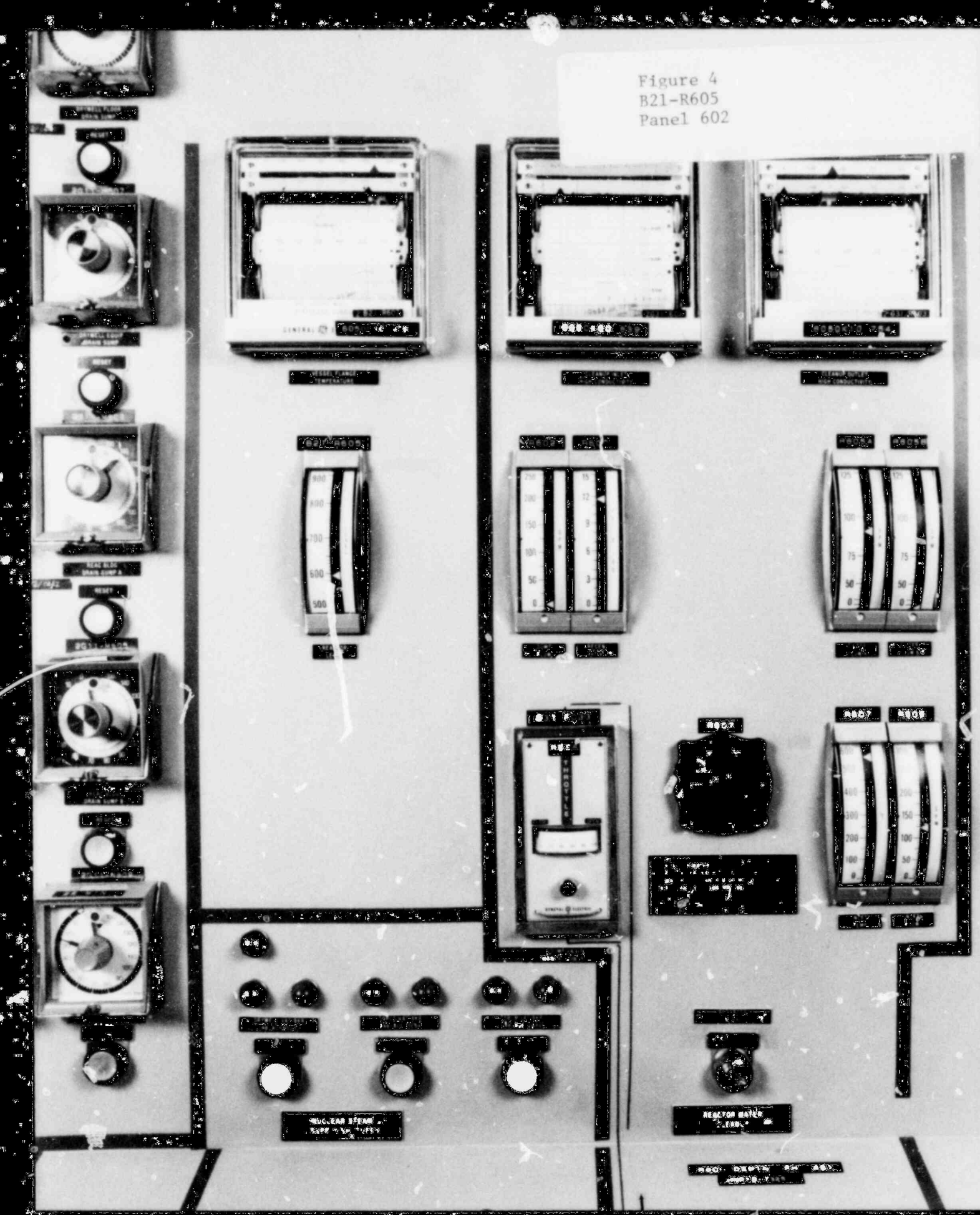


Figure 5
Panel 602
B21-R605

Figure 6
2B21-R623B
2B21-R610
2B21-R615
Panel 601