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J. T. Beckham, Jr.
Vice President and General Manager
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Georgia Power

the southern electric system

NED-83-334

June 15, 1983

Director of Nuclear Reactor Regulation
Attention: Mr. John F. Stolz, Chief
Operating Reactors Branch No. 4
Division of Licensing
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
PURGE AND VENT VALVE OPERABILITY

Gentlemen:

In accordance with the provisions of 10 CFR 50.90 as required by 10 CFR 50.59(c) (1), Georgia Power Company (GPC) hereby proposes an amendment to the Edwin I. Hatch Nuclear Plant Units 1 and 2 Technical Specifications (Appendix A to the Operating Licenses) as described in attachments 1 to 4 of this letter. Pursuant to 10 CFR 50.91, J. L. Ledbetter of the Georgia Department of Natural Resources will be sent a copy of attachments 1 thru 4. This application would amend the Unit 2 operational restrictions on the purge and vent containment isolation valves and would alter the commitment made for the Unit 1 valves.

Unit 2 was licensed with a restriction imposed on the amount of time that the 18" purge and vent isolation valves could be open. In subsequent discussions with the staff it was determined that if: 1) a site specific dose analysis was submitted; 2) measures were taken to protect downstream structures; and 3) valve operability was demonstrated; then the restriction could be lifted. The dose analysis and the valve operability data, with the exception of the seismic test results summary, were submitted in our letter of May 31, 1983. The details of the design modifications are enclosed as attachment 5. The summary of the Wyle Labs test data is included as attachment 6. Based on the information provided in the attachments, we request the removal of the restrictions on time of operation as proposed by attachments 3 and 4.

The Plant Review Board has reviewed the proposed changes and determined that they do not constitute an unreviewed safety question or a significant hazard as defined in 10 CFR 50.92. Due to modifications that are to be made to the plant, the probability and consequences of the accident will actually be decreased. The purpose of this change is to specify operability requirements without limiting the 18 inch valves to a 1% time limitation.

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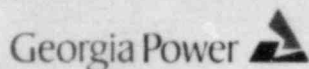
The action statement of this proposed specification essentially restates the current limitations, thus it has no detrimental effect on plant or equipment operation. The surveillance requirements likewise have no detrimental effect on plant or equipment operation because they impose no new operational constraints. Given that this proposed change can not and will not be implemented until completion of the associated design modification discussed in the attachment, the possibility for the existing scenario which could cause damage to Standby Gas Treatment System (SGTS) will have been eliminated. The proposed Technical Specification change, in that light, does not create the possibility of new accidents or malfunctions.

The determination of amendment class is addressed in attachment 2. The proposed change has been determined to be Amendment Class III for one unit and Class I for the other. The appropriate payment is enclosed.

In order to resolve issue (D) of your July 7, 1982 letter, GPC plans to install redundant, safety-grade fast acting, excess flow isolation dampers which will automatically isolate the common 18" vent line from the torus and drywell before it ties into the SGTS filter train suction. To assure that post-LOCA venting capabilities are maintained with the worst single failure, a 2-inch bypass line will be installed around the isolation dampers. We propose that this plant modification be completed during the first outage of sufficient duration on both units after NRC approval of the modification, the completion of the engineering design, and the receipt of materials on site. As previously mentioned, details of the design are in attachment 5.

To ensure operability of the 18" purge and vent valves under combined fluid dynamic and seismic loading conditions, Wyle Laboratories was contracted to test a valve assembly. The test program consisted of: mounting a valve and actuator on a triaxial shaker table, applying a resistance equivalent to the applied torque created when closing the valve against 62 psid, inputting triaxial accelerations equal to the plant SSE, and stroking the valve twice while subjected to the combined loads. Further details are available in attachment 6. While there is nothing proprietary in this letter, we do consider the Wyle test report to be proprietary.

In attachment 1 to our May 31 submittal, we committed to rotation of all purge and vent isolations valves except 2T48-F318 to the inplane orientation. Due to further engineering discussion we have determined that rotation is only necessary on the drywell isolation valves. Therefore, as attachment 7 to this letter we have included revision 1 to the Purge and Vent System Operability Report. The only change is the revision of the rotation commitment and supporting documentation. All previous copies of this report should be discarded.

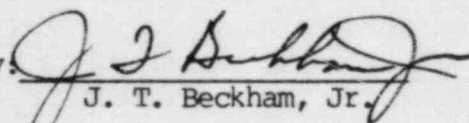


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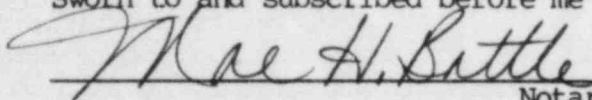
If you have any further questions, please contact this office.

J. T. Beckham, Jr. states that he is 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 are true.

GEORGIA POWER COMPANY

By: 
J. T. Beckham, Jr.

Sworn to and subscribed before me this 15th day of June, 1983.



Notary Public, Georgia, State at Large
My Commission Expires Sept. 20, 1983

Notary Public

MJB/mb

Enclosures

xc: H. C. Nix, Jr.
Senior Resident Inspector
J. P. O'Reilly, (NRC-Region II)

ATTACHMENT 1

NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
EDWIN I. HATCH NUCLEAR PLANT UNITS 1, 2
PROPOSAL FOR TECHNICAL SPECIFICATION CHANGES
PURGE VALVE OPERATION

In accordance with the provisions of 10 CFR 50.90 as required by 10 CFR 50.59(c)(1), Georgia Power Company (GPC) hereby proposes an amendment to the Edwin I. Hatch Nuclear Plant Units 1 and 2 Technical Specifications (Appendix A to the Operating Licenses) as described in attachments 1 to 4 of this letter. Pursuant to 10 CFR 50.91, J. L. Ledbetter of the Georgia Department of Natural Resources will be sent a copy of attachments 1 thru 4. This application would amend the Unit 2 operational restrictions on the purge and vent containment isolation valves and would alter the commitment made for the Unit 1 valves.

Unit 2 was licensed with a restriction imposed on the amount of time that the 18" purge and vent isolation valves could be open. In subsequent discussions with the staff it was determined that if: 1) a site specific dose analysis was submitted; 2) measures were taken to protect downstream structures; and 3) valve operability was demonstrated; then the restriction could be lifted. The dose analysis and the valve operability data, with the exception of the seismic test results summary, were submitted in our letter of May 31, 1983. The details of the design modifications are enclosed as attachment 5. The summary of the Wyle Labs test data is included as attachment 6. Based on the information provided in the attachments, we request the removal of the restrictions on time of operation as proposed by attachments 3 and 4. The attachments also describe the proposed control over the use of the 18" valves which would supplant our commitment, for Unit 1, as stated in our letter of October 1, 1982. These proposed changes would become effective upon the installation of the design modifications described in attachment 5. The wording of the proposed change to the Technical Specification is derived from BWR Standard Technical Specifications, modified to fit the application.

The Plant Review Board has reviewed the proposed changes and determined that they do not constitute an unreviewed safety question or a significant hazard as defined in 10 CFR 50.92. Due to modifications that are to be made to the plant, the probability and consequences of the accident will actually be decreased. The purpose of this change is to specify operability requirements without limiting the 18 inch valves to a 1 $\frac{1}{2}$ time limitation. The action statement of this proposed specification essentially restates the current limitations, thus it has no detrimental effect on plant or equipment operation. The surveillance requirements likewise have no detrimental effect on plant or equipment operation because they impose no new operational constraints. Given that this proposed change can not and will not be implemented until completion of the associated design modification discussed in the attachment, the possibility for the existing scenario which could cause damage to Standby Gas Treatment System (SGTS) will have been eliminated. The proposed Technical Specification change, in that light, does not create the possibility of new accidents or malfunctions.

The determination of amendment class is attachment 2.

ATTACHMENT 2

NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
EDWIN I. HATCH NUCLEAR PLANT UNITS 1, 2
PROPOSAL FOR TECHNICAL SPECIFICATION CHANGES
PURGE VALVE OPERATION

Pursuant to 10 CFR 170.12 (c), Georgia Power Company has evaluated the attached proposed amendment to Operating licenses DPR-57 and NPF-5 and has 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, and does not require an environmental impact statement;
- c. The proposed amendment does not involve a complex issue or more than one environmental or safety issue;
- d) The proposed amendment does involve a single safety issue, namely, changes to the operating limitations of the 18 inch purge and vent valves.
- e. The proposed amendment is therefore a Class III amendment for one unit and a Class I for the other.