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J. T. Beckham, Jr.
Vice President - Nuclear
Hatch Project



March 24, 1994

Docket Nos. 50-321
50-366

HL-4539

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

Edwin I. Hatch Nuclear Plant
Post Repair or Replacement Hydrostatic Test
Alternative Examinations

Gentlemen:

On March 17, 1994, the Nuclear Regulatory Commission staff issued Amendment 132 to Facility Operating License NPF-5 for the Edwin I. Hatch Nuclear Plant - Unit 2. Amendment 132 increases the allowable leakage for the main steam isolation valves (MSIVs) and deletes the MSIV leakage control system. The modification to remove the MSIV leakage control system during the current Unit 2 refueling outage will involve cutting the American Society of Mechanical Engineers (ASME) Class 1 and Class 2 piping adjacent to the main steam lines and installing socket-welded caps (see attached diagram). ASME Section XI currently requires a hydrostatic pressure test of the cap welds prior to returning the system to service. Performance of the hydrostatic test would require filling the main steam lines with water, pinning the spring-can pipe supports and installing temporary pipe supports to support the additional weight of the water on the Class 1 and Class 2 portions of the main steam lines from the inboard MSIV to the turbine stop valves. The entire process of setup and restoration would increase the duration of the refueling outage by approximately three days.

Additionally, GPC will implement a modification to remove and relocate the high pressure coolant injection (HPCI) pump discharge valve to resolve the potential for thermal binding of the valve. ASME Section XI also currently requires a hydrostatic pressure test prior to returning the system to service. Performance of the hydrostatic test has the potential to become a critical path activity during the current Unit 2 refueling outage.

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Due to the difficulty in accomplishing these tests and pursuant to 10 CFR 50.55a (a)(3)(i), Georgia Power Company (GPC) proposes to perform alternative examinations consistent with the ASME Code Case N-416-1 approved on February 15, 1994. GPC proposes to perform the following tests and examinations in lieu of a hydrostatic pressure test to assure the integrity of the associated welds:

1. Perform nondestructive examinations in accordance with the methods and acceptance criteria of the applicable Subsection of the 1992 Edition of ASME Section III.
2. Perform a VT-2 visual examination of the Class 1 and Class 2 welds in conjunction with the applicable system leakage tests, at nominal operating pressure and temperature. These tests will be performed in accordance with the existing inservice inspection program.

These tests and examinations are consistent with those contained in the recently approved code case. GPC will document the replacement/repair, testing, and examination of the replacement/repair in the NIS-1 Report submitted in accordance with the current code of record for inservice inspection activities.

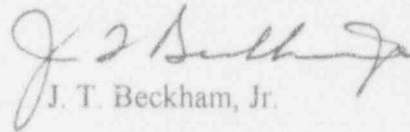
GPC recognizes the short time frame and the imposition on staff resources associated with this proposal. GPC respectfully requests prompt consideration of this proposal for alternative examinations due to the outage activities currently in progress. It is GPC's understanding that the proposed code case has been reviewed by the NRC's representatives of the ASME Section XI Code Committees and that the proposed alternative testing should present no new technical issues for consideration. Given the benefits realized by application of the code case and GPC's understanding of previous staff review of this issue, GPC has concluded that it is appropriate to request approval of the alternative testing.

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Should you have any questions in this regard, please contact this office.

Sincerely,

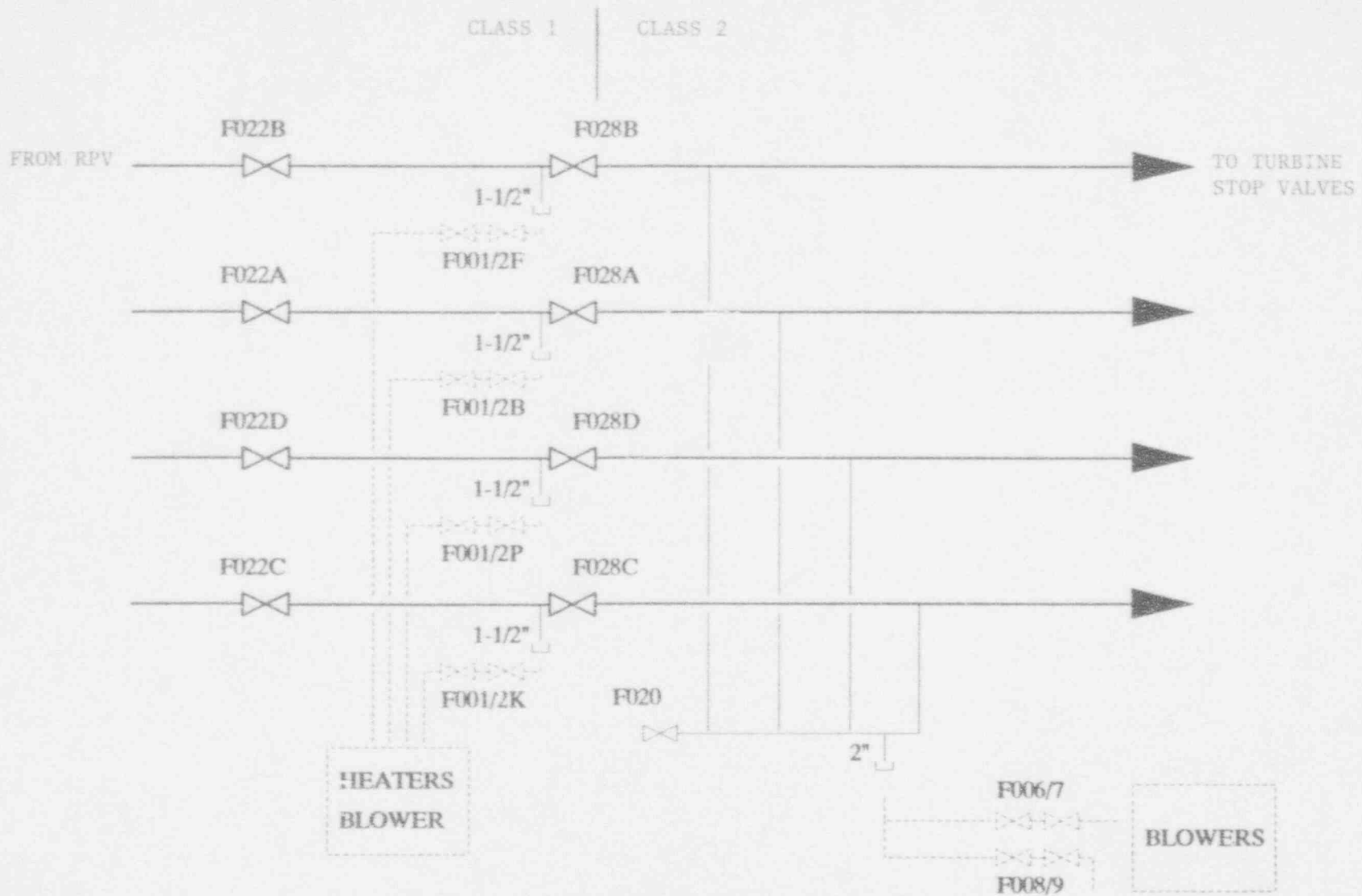

J. T. Beckham, Jr.

JKB/cr

cc: Georgia Power Company
Mr. H. L. Sumner, General Manager - Nuclear Plant
NORMS

U.S. Nuclear Regulatory Commission, Washington, D.C.
Mr. K. Jabbour, Licensing Project Manager - Hatch

U.S. Nuclear Regulatory Commission, Region II
Mr. S. D. Ebnetter, Regional Administrator
Mr. L. D. Wert, Senior Resident Inspector - Hatch



MSIV LEAKAGE CONTROL SYSTEM REMOVAL