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Georgia Power

the southern electric

September 27, 1982

J. T. Beckham, Jr.
Vice President and General Manager
Nuclear Generation

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

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

Gentlemen:

Pursuant to 10 CFR 50.59(c)(1), Georgia Power Company (GPC) hereby requests changes to the Technical Specifications (Appendix A to the Operating License for Unit 2.) The Plant Hatch Unit 2 Technical Specifications were initially issued to GPC on June 13, 1978. The Technical Specifications, as issued by the NRC, contained a requirement in Table 3.7.8-1 to establish and report to the Commission allowable differential settlement values for the Class I structures listed in the table. We are proposing a deletion of the Technical Specification on building settlement and a withdrawal of our submittals on that subject.

Our submittals, dated December 1, 1978, August 14, 1979, and October 8, 1979, addressed the establishment of differential and total settlement values based on consolidation settlement which could gradually occur over the life of the plant. Many of the Commission's requests for information, on the other hand, appear to be primarily concerned with the possibility of very rapid changes in the state of structures due to earthquakes, floods, or other unusual events. The adequacy of plant design with regard to such unusual events was addressed in the Final Safety Analysis Report. Prudent engineering judgment would indicate the need for monitoring settlement after such an event, but not a continuing program once consolidation was nearing completion.

Settlement of the structures at Plant Hatch has occurred in accordance with the predictions in our submittals of December 1, 1978, August 14, 1979, and October 8, 1979. Examination of the settlements of the Unit 2 Category I structures and Turbine Building recorded between October, 1978 and January, 1982 shows there were no average movement changes of more than 1/4 inch. The Reactor, Turbine and Diesel Generator Buildings indicated no change in average movement. The differential movements across structures have decreased overall since 1978, with the maximum ratio of measured to allowable differential movement decreasing from 19 to 14 percent. Due to the insignificant changes in building movements, there has been little change in differential settlements of pipes or anchors.

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The settlement records demonstrate conclusively that long-term settlement of the structures is virtually complete. Any small changes in movement indicated by the surveys performed to date can be attributed to the inevitable slight inaccuracies associated with optical surveying. These indicated movements average out over an extended period of time.

We request that our earlier submittals on building settlement be withdrawn. In addition, due to the analysis of natural disasters discussed in the Final Safety Analysis Report and the slow nature of consolidation, this subject is not a safety issue for Plant Hatch and therefore the current total and differential settlement Technical Specifications should be eliminated. Within sixty days of the NRC's approval of the deletion, GPC will incorporate the collection of building settlement data into plant operating procedure. This will call for a periodic analysis (i.e., yearly) to ensure no significant variation from predicted settlement.

The Plant Review Board and Safety Review Board have reviewed the proposed changes to the Unit 2 Technical Specifications and have concluded that no changes in plant operation are involved and that operation with the deletion of surveillance requirements for total and differential settlement will maintain existing margins of safety for the affected safety-related systems. Thus, the proposed changes to the Technical Specifications for each unit do not increase the probability of occurrence or the consequences of a previously analyzed accident or malfunction of equipment important to safety, nor has the possibility of a previously unanalyzed accident or malfunction of equipment been created. Margins of safety have not been decreased.

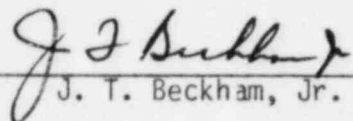
Enclosed with the proposed changes are a determination of amendment class, a check in the amount of \$4,000, and instructions for incorporation of changed pages.

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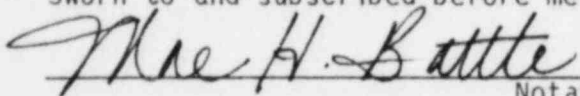
If there are any further questions or comments in this regard, please contact this office.

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 27th day of September, 1982



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

Notary Public

MJB/mb

Enclosure

xc: H. C. Nix
R. F. Rogers, III
J. P. O'Reilly (NRC - Region II)

ATTACHMENT 1

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

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

Remove Page

3/4 7-31
3/4 7-32
B 3/4 7-4

Insert Page

B 3/4 7-4

ATTACHMENT 2

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

Pursuant to 10 CFR 170.22, Georgia Power Company has evaluated the attached proposed amendment to Operating License NPF-5 and has determined that:

- a. The proposed amendment does not require evaluation of a new Safety Analysis Report and rewrite of the facility license;
- b. The proposed amendment does not require evaluation of several complex issues, involve ACRS review, or 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 environmental or safety issue;
- e. The proposed amendment is therefore a Class III amendment.