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The southern electric system

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

ELV-02241
0691

Docket Nos. 50-424
50-425

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

Gentlemen:

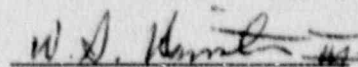
VOGTLE ELECTRIC GENERATING PLANT
REQUEST TO REVISE TECHNICAL SPECIFICATION 3.4.6.1

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 add an additional action statement to Technical Specification (TS) 3.4.6.1, "Leakage Detection Systems," to address the case where less than two of the required leakage detection systems are operable. The proposed change and its basis are described in Enclosure 1. Our evaluation pursuant to 10 CFR 50.92 showing that the proposed change does not involve a significant hazards consideration is provided as Enclosure 2. Instructions for incorporation of the proposed change into the Technical Specifications and marked-up pages are provided as Enclosure 3. In accordance with 10 CFR 50.91, the designated staff official will be sent a copy of this letter and all enclosures.


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

Sworn to and subscribed before me this 28th day of November, 1990.


Notary Public MY COMMISSION EXPIRES DEC. 15, 1992

WGH, III/NJS/gm

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ELV-02241
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Enclosures:

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

c(w): Georgia Power Company

Mr. C. K. McCoy
Mr. W. B. Shipman
Mr. P. D. Rushton
Mr. R. M. Odom
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U. S. Nuclear Regulatory Commission

Mr. S. D. Ebnetter, Regional Administrator
Mr. D. S. Hood, Licensing Project Manager, NRR
Mr. B. R. Bonser, Senior Resident Inspector, Vogtle

State of Georgia

Mr. L. C. Barrett, Commissioner, Department of Natural Resources

ENCLOSURE 1

VOGTLE ELECTRIC GENERATING PLANT REQUEST TO REVISE TECHNICAL SPECIFICATION 3.4.6.1

BASIS FOR PROPOSED CHANGE

Proposed Change

The Vogtle Unit 1 and Unit 2 Technical Specifications for the Reactor Coolant System Leakage Detection Systems (TS 3.4.6.1) do not address the condition where less than two of the required leakage detection systems are operable. The proposed change would add an additional action statement to TS 3.4.6.1 which would require a plant shutdown (Hot Standby in 6 hours and Cold Shutdown within the following 30 hours) in the event that less than two of the required leakage detection systems are operable, in addition to the existing requirements.

Basis

The leakage detection systems required by TS 3.4.6.1 are provided to monitor and detect leakage from the reactor coolant pressure boundary. The action statement of TS 3.4.6.1 is as follows:

With only two of the above required Leakage Detection Systems OPERABLE, operation may continue for up to 30 days provided grab samples of the containment atmosphere are obtained and analyzed at least once per 24 hours when the required Gaseous or Particulate Radioactive Monitoring System is inoperable; otherwise, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

Recently, an event occurred at VEGP which resulted in less than two of the required leakage detection systems being operable. (Reference Licensee Event Report 50-425/1990-006, dated May 29, 1990, ELV-01707.) Given that the above action statement does not explicitly address the condition where less than two of the required leakage detection systems are operable, it was not clear whether the shutdown requirement ("otherwise, be in at least Hot Standby"...., etc.) or TS 3.0.3 was applicable. The net effect on plant operation would have been essentially the same under either TS requirement. The shutdown requirement of TS 3.4.6.1 calls for the plant to be in at least Hot Standby in six hours and Cold Shutdown within the following 30 hours, whereas TS 3.0.3 requires that within one hour action should be taken to place the plant in Hot Standby within six hours, Hot Shutdown within the next 6 hours, and Cold Shutdown within the subsequent 24 hours. However, from a regulatory standpoint the judgement was made to enter TS 3.0.3. To prevent future confusion and eliminate the need for a TS interpretation, GPC proposes to add an action statement to TS 3.4.6.1 which would address the condition where less than two of the required leakage detection Systems are operable.

ENCLOSURE 2

VOGTLE ELECTRIC GENERATING PLANT REQUEST TO REVISE TECHNICAL SPECIFICATION 3.4.6.1

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. If less than two leakage detection systems are operable, the proposed amendment would require placing the plant in Hot Standby within six hours and Cold Shutdown within the following 30 hours. The provisions of TS 3.0.3 would require action within one hour to place the plant in Hot Standby within the next 6 hours, Hot Shutdown within the following 6 hours, and Cold Shutdown within the subsequent 24 hours. The net effect on plant operation is the same under either requirement. Therefore, there is no effect on the probability or consequences of any accident previously evaluated.
2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated. As stated above, the net effect on plant operation is the same under the proposed amendment or under TS 3.0.3. They both require a shutdown in essentially the same time frame. Therefore, there is no potential for a new or different kind of accident.
3. The proposed change does not involve a significant reduction in a margin of safety. The existing margin of safety is maintained in that a plant shutdown will continue to be required in the event that less than two leakage detection systems are operable.

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 any 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.