in the FSAR; (2) The proposed change does not create the possibility of a new or different kind of accident than any previously evaluated because the equipment will continue to be operated in the intended manner; (3) There is no reduction in margin of safety because the minimum required heater output will be maintained. Furthermore, you concluded that there are no irreversible environmental consequences because there is no environmental impact associated with this change. The equipment will continue to operate as designed and analyzed.

At the conclusion of this telephone call, the NRC staff agreed that the proposed change would not affect the safe operation of the system and would not involve a significant hazards consideration. This letter confirms the verbal granting of a temporary waiver of compliance from the requirements of TS 4.7.7.d.4. This temporary waiver of compliance will be in effect while the NRC staff completes the processing of your emergency change request.

Sincerely,

/S/

Gus C. Lainas, Assistant Director
for Region II Reactors
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
As stated

cc w/encl:
See next page

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Document Name: VOGTLE TEMPORARY WAIVER

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

December 17, 1990

Docket Nos. 50-424
and 50-425

Mr. W. G. Hairston, III
Senior Vice President
Nuclear Operations
Georgia Power Company
P.O. Box 1295
Birmingham, AL 35201

Dear Mr. Hairston:

SUBJECT: TEMPORARY WAIVER OF COMPLIANCE - VOGTLE ELECTRIC GENERATING PLANT, UNITS 1 AND 2

By telephone call on December 13, 1990, you requested an emergency Technical Specification (TS) change pursuant to the Commission's authority under 10 CFR 50.91(a)(5). The requested change would revise the surveillance requirement of TS 4.7.7.d.4 to require verification of heater capacity based on its effectiveness in maintaining the relative humidity of the airstream through the filters at 70 percent or less under design basis accident conditions when tested in accordance with Section 14 of ANSI N 510-1980. TS 4.7.7.d.4 presently requires that the heaters in the Piping Penetration Area Filtration and Exhaust Systems dissipate 80 ± 4 kW when tested periodically in accordance with Section 14 of ANSI N 510-1980. Your marked copy of the proposed changes to TS page 3/4 7-18, which was transmitted to the NRC by your letter dated December 14, 1990, is enclosed.

The TS change request results from your recent discovery that heater output has not been properly corrected for voltage during past surveillances. When the correct adjustment for voltage was made, the heater output for one train on Unit 2 and both trains on Unit 1 was found to be less than the minimum value of 76 kW allowed by the present TS 4.7.7.d.4, but more than the minimum heater capacity needed to limit the relative humidity of the airstream through the filters to a value of 70 percent. Moreover, the heaters and filters are fully capable of performing their safety functions. The emergency TS change is needed to preclude an unnecessary shutdown of Unit 2 and to prevent delay in the startup of Unit 1.

You also indicated your conclusion that the proposed change does not involve a significant hazards consideration. Specifically, you concluded that: (1) The probability or consequences of any accident previously evaluated are not affected because the system will continue to perform its safety function as discussed

FOI
1/1

cc:
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heater capacity is sufficient to maintain the relative humidity of the airstream through the filters at 70 percent or less under design basis accident conditions when tested in accordance with Section 14 of ANSI N510-1980.

PLANT SYSTEMS

3/4.7.7 PIPING PENETRATION AREA FILTRATION AND EXHAUST SYSTEM

SURVEILLANCE REQUIREMENTS (Continued)

2) Verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Section 13 of ANSI N510-1980 meets the laboratory testing criterion of greater than or equal to 99.8% when tested with methyl iodide at 30°C and 70% relative humidity.

3) Verifying a system flow rate of 15,500 cfm ± 10% during system operation when tested in accordance with Section 8 of ANSI N510-1980.

c. After every 720 hours of charcoal adsorber operation, by verifying, within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Section 13 of ANSI N510-1980 meets the laboratory testing criteria of greater than or equal to 99.8% when tested with methyl iodide at 30°C and 70% relative humidity;

d. At least once per 18 months by:

1) Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 6 inches Water Gauge while operating the system at a flow rate of 15,500 cfm ± 10%.

2) Verifying that the system starts on a Containment Ventilation Isolation test signal,

3) Verifying that the system maintains the Piping Penetration Filtration Exhaust Unit Room at a negative pressure of greater than or equal to 1/4 inch Water Gauge relative to the outside atmosphere (PDI-2550, PDI-2551), and

4) Verifying that ~~the heaters dissipate 80 ± 4 kW when tested in accordance with Section 14 of ANSI N510-1980.~~

e. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove greater than or equal to 99.95% of the DOP when they are tested in-place in accordance with Section 10 of ANSI N510-1980 while operating the system at a flow rate of 15,500 cfm ± 10%.

f. After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorbers remove greater than or equal to 99.9% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with Section 12 of ANSI N510-1980 while operating the system at a flow rate of 15,500 cfm ± 10%.