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April 21, 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
NUREG-0737 ITEM II.K.3.13: RCIC AUTOMATIC RESTART

Gentlemen:

Your letter of March 16, 1983 transmitted to Georgia Power Company (GPC) three enclosures related to Item II.K.3.13 of NUREG-0737. Item II.K.3.13 required (1) separation of High Pressure Coolant Injection (HPCI) and Reactor Core Isolation Cooling (RCIC) initiation levels and (2) modification of the RCIC initiation logic to allow automatic RCIC restart on low reactor vessel water level following a high level trip.


The first enclosure to your March 16, 1983 letter was the NRC staff's Safety Evaluation of the BWR Owners Group submittal regarding separation of HPCI and RCIC initiation levels. The staff concurred with the conclusion of the Owners Group that no significant benefit would be gained by separation of HPCI and RCIC initiation levels and considered no further action necessary in response to this aspect of Item II.K.3.13. GPC was a participant in this Owners Group evaluation, therefore, our response to this aspect of Item II.K.3.13 is considered complete.

Your second enclosure was the staff's Safety Evaluation of the Owners Group submittal regarding RCIC automatic restart. The staff concluded that the modification recommended by the Owners Group, i.e., relocation of the existing high level trip from the RCIC turbine trip valve to the steam supply valve, was acceptable on a generic basis. GPC has also been a participant in this Owners Group evaluation and has implemented the recommended modification at Plant Hatch Units 1 and 2.

The final enclosure of your letter was a summary of acceptance criteria for design and quality assurance requirements which the staff considered necessary in developing RCIC automatic restart modifications. GPC was requested to verify that these criteria were met in the development of such modifications for Plant Hatch. Our response to this request is attached hereto as Enclosure 1.

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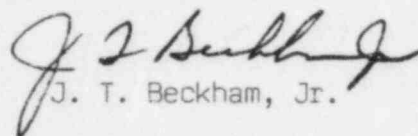
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Please contact this office if there are any questions.

Very truly yours


J. T. Beckham, Jr.

JH/
Enclosure

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

ENCLOSURE 1

RESPONSE TO
PLANT SPECIFIC ACCEPTANCE CRITERIA FOR
REACTOR CORE ISOLATION COOLING (RCIC)
"AUTOMATIC RESTART"

STAFF POSITION

1. "The RCIC system shall be modified to relocate the existing logic for the high reactor vessel water level trip from the RCIC turbine trip valve to the steam supply valve to permit subsequent auto restart of the RCIC system on low water level. This change will be consistent with actions identified in the BWR Owners Group proposed modification, noted above, for RCIC automatic restart, including plant specific considerations."

RESPONSE

The RCIC systems at Plant Hatch Units 1 and 2 have been modified to relocate the high reactor vessel water level trip from the RCIC turbine trip valve to the steam supply valve. This modification permits automatic restart on low water level following a high level trip and is consistent with the BWR Owners Group proposed modification.

STAFF POSITION

2. "The modifications to the RCIC system shall be designed and implemented to standards consistent with the original system design."

RESPONSE

The automatic restart modification was designed and implemented to standards consistent with safety-related systems.

STAFF POSITION

3. "For those plants for which the RCIC system is classified as a safety-related system, the quality assurance requirements of Appendix B to 10 CFR Part 50 apply. In order to provide assurance that the modifications of the RCIC system are implemented to standards commensurate with the system's importance to safety, for those plants for which the RCIC system is not classified as a safety-related system, the following requirements are applicable."
 - (a) "Design control measures shall provide for verifying the adequacy of the design, such as by the performance of an independent design review of the changes, consistent with the intent of Section III "Design Control", of Appendix B to 10 CFR Part 50.*"

(b) "A system function test shall be conducted to verify the adequacy of the design to satisfy its functional performance requirements consistent with the intent of Section XI, Test Control, of Appendix B to 10 CFR Part 50."

* "Reference to Appendix B is to provide guidance rather than to establish specific requirements."

RESPONSE

(a) Design control measures consistent with modifications to safety-related systems were implemented for the RCIC automatic restart modification. These design control measures are consistent with Section III of Appendix B to 10 CFR Part 50. An independent review of the BWR Owners Group recommended modifications was performed.

(b) Functional tests verifying the adequacy of the design to satisfy its functional performance requirements were performed for the subject RCIC system modification. The functional tests were written, implemented, and recorded consistent with Section XI of Appendix B to 10 CFR Part 50.