

Georgia Power Company
333 Piedmont Avenue
Atlanta, Georgia 30308
Telephone 404 526-7020

Mailing Address:
Post Office Box 4545
Atlanta, Georgia 30302

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



NED-83-266

April 22, 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 DOCKET 50-321
OPERATING LICENSE DPR-57
EDWIN I. HATCH NUCLEAR PLANT UNIT 1
PROPOSAL FOR TECHNICAL SPECIFICATION CHANGES
DRYWELL TO TORUS DIFFERENTIAL PRESSURE SYSTEM

Gentlemen:

In accordance with the provisions of 10 CFR 50.90 as required by 10 CFR 50.59(c)(1), Georgia Power Company (GPC) hereby proposes an amendment to the Edwin I. Hatch Nuclear Plant Unit 1 Technical Specifications (Appendix A to the Operating License). This application requests the deletion of the Drywell to Torus Differential Pressure System.

By letter dated September 30, 1976, the NRC required GPC to submit an application for license amendment for Hatch 1 to incorporate into the Technical Specifications Limiting Conditions for Operation and Surveillance Requirements for the drywell-torus differential pressure system. The need for this system was identified by the Plant Unique Analysis which was performed for the Hatch 1 torus as part of the Mark I Containment Short-Term Program in order to evaluate the potential effects of post-LOCA hydrodynamic loads caused by pool swell. The reduction of the water leg in the torus downcomers, using the drywell-torus differential pressure system, was found to be a method for limiting pool swell loads. Accordingly, the Hatch 1 operating license was subsequently modified by Amendment 55 to incorporate operability requirements for the drywell-torus differential pressure system.

During the period when the Short-Term Program requirements were developed, pool swell loads were considered to be the governing loads in the torus shell analysis. However, based on additional modeling that had to be considered as part of the Long-Term Program requirements, analysis has shown that pool swell loads no longer represent worst case conditions. More importantly, it has now been determined that operation of the drywell-torus differential pressure system adversely affects safety/relief valve blowdown loads.

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The drywell-torus differential pressure system affects the safety/relief valve waveform pressure amplitudes and frequencies for normal operating conditions involving safety/relief valve blowdown loads. The resulting normal operating condition waveform closely resembles the waveform for the intermediate and small break accident conditions without the drywell-torus differential pressure system removed. In some cases, the analysis and design of the torus shell, internal structures and attached piping would be governed by the normal operating condition case rather than the intermediate and small break accident event. Using the methodology outlined in Mark I Containment Program Structural Acceptance Criteria Plant Unique Analysis Application Guide (GE Report NEDO-24583-1, October 1979), and Mark I Containment Program - Load Definition Report (GE Report NEDO-21888, December 1978), analysis has now shown that by deleting operation of the drywell-torus differential pressure system, safety/relief blowdown loads can be reduced at least 25%. Also, it has been demonstrated in GPC's January 26, 1983 submittal of the Plant Unique Analysis Report (PUAR), which did not consider operation of the drywell-torus differential pressure system, that the loads generated in the torus are acceptable. Consequently, removal of the system from operation on Hatch 1 is justified and is consistent with the analyses performed in generating the PUAR. Therefore, Attachment 2 contains proposed changes to the Hatch 1 Technical Specifications to delete this requirement.

The Plant Review Board and Safety Reivew board have reviewed the proposed changes to the Hatch 1 Technical Specifications and concluded that the absence of operation of the drywell-torus differential pressure system will not affect the continued safe operation of the plant. Moreover, its deletion will result in a reduction of safety/relief valve blowdown loads in the torus. Thus, the probability of occurrence or the consequences of a previously analyzed accident or malfunction of equipment important to safety will not be increased. Since these changes introduce no new mode of operation, the possibility of an accident or malfunction of a different type than analyzed in the FSAR does not result. Margins of safety will not be decreased. Therefore, the proposed changes to the Hatch 1 Technical Specifications do not constitute an unreviewed safety question.

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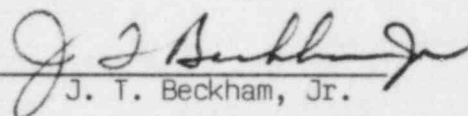
Enclosed is the determination of amendment class. The proposed changes have been determined to be one Class III amendment. The appropriate payment is enclosed.

Based on the PUAR, this change is requested at your earliest convenience.

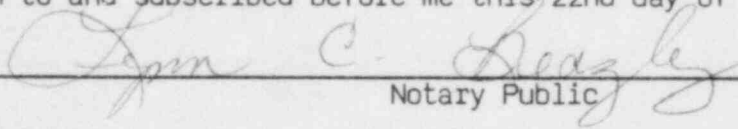
If you require any additional information or have any questions, please contact this office.

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 22nd day of April, 1983.



Notary Public

MJB/mb

Notary Public, Georgia, State at Large
My Commission Expires July 26, 1985

Enclosure

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

ATTACHMENT 1

NRC DOCKET 50-321
OPERATING LICENSE DPR-57
EDWIN I. HATCH NUCLEAR PLANT UNIT 1
DETERMINATION OF AMENDMENT CLASS

Pursuant to 10 CFR 170.12(c), Georgia Power Company has evaluated the attached proposed amendment to Operating License DPR-57 and has determined that:

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

ATTACHMENT 2

NRC DOCKET 50-321
OPERATING LICENSE DPR-57
EDWIN I. HATCH NUCLEAR PLANT UNIT 1
PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS

The proposed changes to the Technical Specifications (Appendix A to Operating License DPR-57) would be incorporated as follows:

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3.2-22	3.2-22
3.2-48	3.2-48
3.7-10	3.7-10
3.7-10a	3.7-10a
3.7-33a	3.7-33a
3.7-34	3.7-34