

UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

June 13, 1994

Docket Nos. 50-321 and 50-366

> Mr. J. T. Beckham, Jr. Vice President - Plant Hatch Georgia Power Company P. O. Box 1295 Birmingham, Alabama 35201

Dear Mr. Becknam:

SUBJECT: SAFETY EVALUATION OF RELIEF REQUESTS FOR THE PUMP AND VALVE

INSERVICE TESTING PROGRAM - EDWIN I. HATCH NUCLEAR PLANT, UNITS 1

AND 2 (TAC NOS. M83192 AND M83193)

By letter dated December 10, 1991, the NRC staff provided you a Safety Evaluation (SE) which contained a Technical Evaluation Report addressing your second ten-year inservice testing (IST) program for pumps and valves at Edwin I. Hatch Nuclear Plant, Units 1 and 2. The staff requested that you address the 29 anomalies identified in Appendix A to the SE. Your letter dated April 16, 1992, divided the anomalies into three separate categories and summarized them in three separate tables. Table 1 identified the anomalies for which you are in agreement with the staff positions stated in the December 10, 1991, SE. For the anomalies listed in Tables 2 and 3, you stated that additional justification and revised relief requests would be submitted by June 1 and November 17, 1992, respectively.

In addition to the above, the December 10, 1991, SE, requested that you investigate the categorization of the ECCS torus suction valves in lines leading to the residual heat removal, containment spray, high pressure coolant injection, and reactor core isolation cooling systems. The NRC staff stated that these valves should be Category A valves and leak rate tested in accordance with the requirements of ASME Section XI, Paragraph IWV-3420. Your letter dated March 10, 1992, stated that the categorization of these valves was reviewed and concluded that they were appropriately categorized as Category B valves. By letter dated September 7, 1993, the NRC staff closed out this matter.

By letter dated June 5, 1992, you responded to the anomalies identified in Tables 1 and 2. By letter dated April 5, 1993, the NRC staff provided you an SE which partially approved your June 5, 1992, response. Subsequently, by letters dated July 2, 1993, and April 4, 1994, you provided additional justification and revised relief requests addressing the concerns identified by the staff in their April 5, 1993, SE.

Furthermore, by letter dated November 17, 1992, you provided responses and revised relief requests related to the Table 3 anomalies. This enclosed SE evaluates your submittals dated July 2 and November 17, 1993, and April 4, 1994, and approves your relief requests.

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JJohnson, RII

During the course of this review, we have determined that certain requirements of Section XI of the ASME Boiler and Pressure Vessel Code, for which you have requested relief are (i) impractical to perform, (ii) compliance would result in hardship without a compensating increase in safety, or (iii) the proposed alternative testing, specified in your submittals, ensures an acceptable level of quality and safety. For these cases, relief from the Code requirements is granted as requested, with provisions, or on an interim basis, pursuant to 10 CFR 50.55a(a)(3)(i), 50.55a(a)(3)(ii), or 10 CFR 50.55a(f)(6)(i). The results of the NRC staff's evaluation of all relief requests are summarized in the enclosed SE.

For the reliefs that are granted as requested or granted with provisions, the staff has determined that these reliefs are authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest giving due consideration to the burden that could result if the requirements were imposed on your facility.

Based on our review, we have determined that the Hatch IST program reflects compliance with Commission requirements of 10 CFR 50.55a(f) and with ASME Code, Section XI, except where relief has been granted, granted with provisions, or granted on an interim basis. Therefore, it is acceptable for implementation provided the items identified in the SE are addressed within the time frame specified therein.

Program changes such as additional relief requests or changes to relief requests should be submitted for staff review and should not be implemented prior to review and approval by the NRC; however, new or revised relief requests meeting the positions in Generic Letter 89-04, Enclosure 1, should be submitted to the NRC staff but can be implemented provided the guidance in Generic Letter 89-04, Section D, is followed. Program changes that involve additions or deletions of components from the IST program should be provided to the NRC.

This completes our actions on TAC Nos. M83192 and M83193. If you have any questions concerning this matter, please contact Kahtan Jabbour at (301) 504-1496.

Sincerely,

Louis L. Wheeler for David B. Matthews, Director Project Directorate II-3 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

D:PDII-3

Enclosure: Safety Evaluation

cc w/enclosure: See next page

*See previous concurrence

PDII-3: PM | PDII-3: PM | KJABBOUR: CW

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*OGC CWoodhead

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Sincerely,

David B. Matthews, Director Project Directorate II-3

Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Enclosure: Safety Evaluation

cc w/enclosure: See next page Mr. J. T. Beckham, Jr. Georgia Power Company

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