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Georgia Power

the southern electric system

LCV-0212-A

July 29, 1994

Docket Nos. 50-424
50-425

TAC- M89507
M89508

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

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT
REQUEST TO REVISE PROPOSED AMENDMENT
TO TECHNICAL SPECIFICATIONS RELATED TO
AC SOURCES OPERATING

By letter dated April 28, 1994, (LCV-0212) Georgia Power Company (GPC) proposed an amendment to the Vogtle Electric Generating Plant (VEGP) Unit 1 and Unit 2 Technical Specifications (TS). Specifically, the proposed amendment would affect TS 3/4.8.1.1, AC Sources Operating, and it included, in part, proposed changes to table 4.8-1, Diesel Generator Test Schedule, that would have incorporated the test schedule of section D.2.4.4, Appendix D to NUMARC 87-00, Revision 1. The proposed amendment would also have deleted the diesel generator (DG) reporting requirements of surveillance requirement (SR) 4.8.1.1.3 and the reference to SR 4.8.1.1.3 that appears in SR 4.8.1.2 of TS 3/4.8.1.2, AC Sources Shutdown.

On July 19 and 20, 1994, the NRC staff, via telephone conversations, expressed concern that our proposed changes to Table 4.8-1 were unacceptable on the basis that the NRC staff was no longer endorsing the trigger values of Appendix D to NUMARC 87-00. The NRC staff suggested that we either utilize Generic Letter 94-01 and delete Table 4.8-1 or withdraw the proposed changes to Table 4.8-1. However, GPC cannot at this time commit to comply with the conditions of Generic Letter 94-01, and GPC therefore elects to withdraw the proposed changes to Table 4.8-1. In addition, because the deletion of the reporting requirements of SR 4.8.1.1.3 is also part of Generic Letter 94-01, the NRC staff stated that our proposed deletion of SR 4.8.1.1.3 and its reference in SR 4.8.1.2 of TS 3/4.8.1.2 would have to be withdrawn also. Therefore, GPC agrees to withdraw the proposed deletion of SR 4.8.1.1.3 and the reference to it in SR 4.8.1.2.

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The remainder of the proposed amendment of LCV-0212, dated April 28, 1994, is as follows. GPC requests that the NRC staff continue to review the changes to Specification 3/4.8.1.1, AC Sources Operating, proposed in LCV-0212 as described below.

1. Per Generic Letter (GL) 93-05, action statement a. would be revised to delete the requirement to test the DGs in the event of an inoperable offsite circuit.
2. Per GL 93-05, action statement b. would be revised to eliminate the need to test the operable DG in the event that the other DG became inoperable due to an inoperable support system or an independently testable component in addition to the existing provision excluding preplanned preventive maintenance or testing. Furthermore, if the operable DG must be tested, it would have to be tested within 8 hours (as opposed to 24 hours) unless the absence of any potential common mode failure for the remaining diesel generator is demonstrated.
3. Per GL 93-05, action statement c. would also be revised to eliminate the need to test the operable DG in the event that the other DG became inoperable due to an inoperable support system or an independently testable component in addition to the existing provision excluding preplanned preventive maintenance or testing. In addition, the operable DG would not have to be tested if the absence of any potential common mode failure for the remaining diesel generator is demonstrated. A reference to action statement a. would also be deleted because of the change to action statement a. described above.
4. Per GL 93-05, action statement e. would be revised to eliminate the need to test the DGs in the event that two offsite circuits are inoperable.
5. Per Regulatory Guide (RG) 1.9, Revision 3, surveillance requirement (SR) 4.8.1.1.2 a.4 would be revised to incorporate the provision to perform routine monthly testing by gradually accelerating the DG to operating speed as opposed to requiring the DG to attain rated voltage and frequency within 11.4 seconds. As a direct result of this proposed change, action statements b., c., and f. would be revised to reference SR 4.8.1.1.2 g.1 instead of SR 4.8.1.1.2 a.4 in the event that an operable DG must be tested when the other DG is inoperable. This has the effect of requiring the operable DG to be fast-started for testing pursuant to the action statement.
6. Consistent with the recommendations of GL 93-05, SR 4.8.1.1.2 g.2 would be revised to allow the DG to be gradually loaded as opposed to a fast loading.

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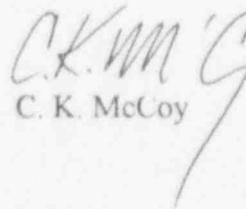
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7. Per RG 1.9, Revision 3, SR 4.8.1.1.2.h.7 would be revised to separate the 24-hour endurance run from the hot restart test. As a result, new SR 4.8.1.1.2.h.8 would be created to require the hot restart test. The DG would be operated for a minimum of 2 hours at a load of 6800-7000 kw, and the DG would be shut down. Within 5 minutes of shutdown, the DG would be restarted and required to attain rated voltage and frequency within 11.4 seconds. Footnote ## (which provides for reperforming the hot restart test without repeating the 24-hour endurance test) would be deleted since it would no longer be required. Existing SRs 4.8.1.1.2.h.8, 9, 10, 11, and 12 would be renumbered to accommodate the addition of new SR 4.8.1.1.2.h.8.
8. The associated Bases would be revised to be consistent with the above changes.

In accordance with the requirements of 10 CFR 50.92, LCV-0212 contained an evaluation demonstrating that the proposed changes did not involve a significant hazards consideration. The revisions to the proposed amendment as discussed above (i.e., withdrawal of the proposed changes to Table 4.8-1 and deletion of SR 4.8.1.1.3) do not affect the conclusions of that original evaluation pursuant to 10 CFR 50.92.

Sincerely,


C. K. McCoy

Enclosure

xc: Georgia Power Company
Mr. J. B. Beasley, Jr.
Mr. M. Sheibani
NORMS

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