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G. F. Head Service President Power Generation

NED-83-480

September 19, 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 AND 2 SCRAM DISCHARGE SYSTEM TECHNICAL SPECIFICATIONS

## Gentlemen:

8309260199 830919 PDR ADOCK 05000321

PDR

Pursuant to 10 CFR 50.90, as required by 10 CFR 50.59(c)(1), Georgia Power Company hereby proposes changes to the Technical Specifications (Appendix A to Operating Licenses DPR-57 and NPF-5).

The proposed changes are required by your letter of June 24, 1983, and result from modifications to the scram discharge system. The modifications and changes to the Technical Specifications (TS) conform to criteria developed by the BWR Owners Group and endorsed by NRC's Generic Safety Evaluation Report dated December 1, 1980. These changes are required to be implemented by December 31, 1983.

The requested changes are as follows:

 Add Limiting Condition for Operation (LCO), Surveillance Requirements, and Bases for scram discharge volume (SDV) vent and drain valve operability. (Units 1 and 2)

The proposed changes are based on model TS supplied in your letter of June 24, 1983. A "12 hour to Hot Shutdown" LCO has been included for one or more valves inoperable, although none was provided in the model TS. This LCO was chosen based on the LCO for model TS 3.1.3.1, Control Rod Operability.

 Add LCO and Surveillance Requirements for SDV high water level rod block instrumentation. (Unit 1)

In accordance with our letter of October 1, 1981, TS similar to those for Unit 2 are provided.

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3) Add new diverse SDV high water level scram instrumentation to Reactor Protection System instrument tables. (Units 1 and 2)

The model TS did not reflect the addition of this instrumentation. Consequently, the new instruments have been given the same operability requirements as the original level switches. The original instruments' LCO has likewise been applied to the new instruments. However, we believe that some relief from the present LCO (6 hours to Hot Shutdown) should be provided since the number of trip systems has been doubled. We will discuss this subject with the NRC Hatch Licensing Project Manager during the review of this submittal. Additionally, for Unit 1, the surveillance frequency for the original level switches has been changed from quarterly to monthly to correspond to the frequency for the new instruments and the Unit 2 instruments.

The Plant Review Board and Safety Review Poard have reviewed the proposed changes and determined that they do not constitute an unreviewed safety question. Each of these changes reflects a more conservative requirement. Operability requirements, LCOs and surveillances are being provided for equipment which previously had none. New diverse and redundant instrumentation is being added. Previously analyzed accident probabilities and consequences will not be increased, and should be decreased, by this change. No new modes of operation are involved. Margins of safety, as defined in the TS, will not be reduced.

Pursuant to 10 CFR 50.92, we have determined that these changes do not constitute a significant hazard. Each of the changes outlined in 1, 2 and 3 above results in no significant increase to accident probabilities or consequences. No new accidents are created. The margin of safety is not significantly decreased. Each of the changes is therefore within acceptance criteria. Each change is consistent with Example (ii) of "Amendments That are Considered Not Likely to Involve Significant Hazards Considerations" as described in the Federal Register, Vol. 48, No. 67, Page 14870.

Enclosed is a determination of amendment class and appropriate payment.

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G. F. Head 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: S. F. Head

Sworn to and subscribed before me this 19th day of September, 1983.

y Public Notary Public, Georgia, State at Large REB/rb My Commission Expires July 26, 1985

xc: H. C. Nix, Jr. Senior Resident Inspector

J. P. O'Reilly, (NRC-Region II)

## ATTACHMENT 1

## NRC DOCKETS 50-321, 50-366 OPERATING LICENSES DPR-57, NPF-5 EDWIN I. HATCH NUCLEAR PLANT UNITS 1 AND 2 SCRAM DISCHARGE SYSTEM TECHNICAL SPECIFICATIONS

Pursuant to 10 CFR 170.12, Georgia Power Company has evaluated the attached proposed amendment to Operating Licenses DPR-57 and NPF-5 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;
- 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, addition of NRC required equipment and additional limitations.
- e. The proposed amendment is therefore a Class III amendment for one unit and a Class I amendment for the other unit.