Georgia Power Company 333 Piedmont Avenue Atlanta. Georgia 30308 Tereptione 404 526 7020

Anling Address Post Office Box 4545 Atlanta, Georgia 30302

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



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February 6, 1984

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 REQUEST TO AMEND TECHNICAL SPECIFICATIONS - TMI ACTION PLAN ITEMS

Gentlemen:

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Your letter of November 1, 1983, (Generic Letter 83-36) identified those TMI Action Plan items which were scheduled for implementation after December 31, 1981, and for which Technical Specification changes were required. Guidance on the scope of specifications and sample pages in the format of the Standard Technical Specification were provided for informational purposes. Georgia Power Company (GPC) was requested to review Plant Hatch Technical Specifications to determine their degree of consistency with the staff guidance and to submit an application for license amendments where necessary.

GPC has completed the requested review and determined the appropriate changes. In accordance with the provisions of 10 CFR 50.90 as required by 10 CFR 50.59(c)(1), GPC proposes to amend the Plant Hatch Units 1 and 2 Technical Specifications (Appendix A to the Operating Licenses). Pursuant to 10 CFR 50.92, J. L. Ledbetter of the Georgia Department of Natural Resources will be sent a copy of this submittal. The specific changes requested are detailed in Enclosure 1 (response to NRC staff guidance) and Enclosure 2 (instructions for incorporation of changes) of this letter.

The proposed changes have been reviewed by the Plant Review Board and the Safety Review Board and have been determined not to involve an unreviewed safety question. The probability of occurrence and the consequences of an accident or malfunction of equipment important to safety would not be increased above those analyzed in the FSAR because of the

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operation of safety-related equipment is not affected by the proposed changes. The possibility of an accident or malfunction of a different type than any analyzed in the FSAR would not result from these changes because no new mode of failure is introduced. The margin of safety as defined in the basis for any Technical Specification would not be affected by these changes because the changes involve additional retrictions not previously included in the Technical Specifications. The proposed changes have been evaluated and determined not to involve significant hazards considerations. This evaluation is documented in Enclosure 3.

A determination of amendment class is included as Enclosure 4. We have determined these amendments to be Class III for one unit and Class I for the other unit and have enclosed the appropriate payment.

J. T. Beckham, Jr. states that he is a 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 6th day of February, 1984.

William E. Su

Notary Public, Georgia, State at Large My Commission Expires Aug.26, 1986 Notary Public

JH/mw

Enclosures

xc: J.T. Beckham, Jr. H.C. Nix, Jr. J.P. O'Reilly (NRC - Region II) Senior Resident Inspector J.L. Ledbetter

ENCLOSURE 1

NRC DOCKETS 50-321, 50-366 OPERATING LICENSES DPR-57, NPF-5 EDWIN I. HATCH NUCLEAR PLANT UNITS 1, 2 REQUEST TO AMEND TECHNICAL SPECIFICATIONS - TMI ACTION PLAN ITEMS

Georgia Power Company (GPC) response to the NRC staff guidance provided in Generic Letter 83-36 is as follows:

(a) STAFF GUIDANCE - REACTOR COOLANI' SYSTEM VENTS (II.B.1)

"The staff has determined that no changes to Technical Specifications are required by this Action Plan item for Boiling Water Reactors (BWRs) which do not have isolation condenser. The staff has also concluded that no changes in Technical Specifications are required for those plants which have isolation condenser, and either a turbine driven high pressure injection system or a feedwater coolant injection system with an auxiliary power source such as a gas turbine.

Those BWRs with isolation condenser, and no high pressure injection other than normal feedwater or the control rod drive system must have isolation condenser vents which satisfy the requirements of Item II.B.1 of NUREG-0737. These plants should have at least one reactor coolant system vent path (consisting of at least two valves which are powered from emergency buses) operable and closed at all times (except for cold shutdown and refueling) at isolation condenser high points. A typical Technical Specification for reactor coolant system vents is provided in Enclosure 3."

RESPONSE

Plant Hatch has no isolation condensers. Technical Specification changes in response to this item are therefore not necessary.

(b) STAFF GUIDANCE - POST-ACCIDENT SAMPLING (II.B.3)

"Licensees should ensure that their plant has the capability to obtain and analyze reactor coolant and containment atmosphere samples under accident conditions. An administrative program should be established, implemented and maintained to ensure this capability. The program should include:

- a) training of personnel
- b) procedures for sampling and analysis, and
- c) provisions for maintenance of sampling and analysis equipment

It is acceptable to the Staff, if the licensee elects to reference this program in the administrative controls section of the Technical Specifications and include a detailed description of the program in the plant operation manuals. A copy of the program should be readily available to the operating staff during accident and transient conditions."

Item II.E.3 has not yet been fully implemented at Plant Hatch. Technical Specification changes will be addressed at the time implementation is complete. The completion schedule is currently being negotiated by GPC and the NRC staff.

(c) STAFF GUIDANCE - NOBLE GAS EFFLUENT MONITORS (II.F.1.1)

"Noble gas effluent monitors provide information, during and following an accident, which are considered helpful to the operator in assessing the plant condition. It is desired that these monitors be operable at all times during plant operation, but they are not required for safe shutdown of the plant. In case of failure of the monitor, appropriate actions should be taken to restore its operational capability in a reasonable period of time. Considering the importance of the availability of the equipment and possible delays involved in administrative controls, 7 days is considered to be the appropriate time period to restore the operability of the monitor. An alternate method for monitoring the effluent should be initiated as soon as practical, but no later than 72 hours after identification of the failure of the monitor. If the monitor is not restored to operable condition within 7 days after the failure, a special report should be submitted to the NRC within 14 days following the event, outlining the cause of inoperability, actions taken and the planned schedule for restoring the system to operable status."

RESPONSE

Post-accident effluent monitors have been installed at the Main Stack and the Units 1 and 2 Reactor Building Vent Plenums. These monitors supplement the previously existing normal range monitors to provide noble gas monitoring capability in accordance with Item II.F.1.1. Enclosure 2 contains proposed revisions to the Units 1 and 2 Technical Specifications which would add the post-accident monitors to the lists of accident monitoring instruments. Proposed LCO and surveillance requirements are in accordance with the staff guidance.

(d) STAFF GUIDANCE - SAMPLING AND ANALYSIS OF PLANT EFFLUENTS (II.F.1.2)

Each operating nuclear power reactor should have the capability to collect and analyze or measure representative samples of radioactive iodines and particulates in plant gaseous effluents during and following an accident. An administrative program should be established, implemented and maintained to ensure this capability. The program should include:

- a) training of personnel
- b) procedures for sampling and analysis, and
- c) provisions for maintenance of sampling and analysis equipment

It is acceptable to the Staff, if the licensee elects to reference this program in the administrative controls section of the Technical Specifications and include a detailed description of the program in the plant operation manuals. A copy of the program should be readily available to the operating staff during accident and transient conditions."

The post-accident effluent monitors which were installed at the Main Stack and the Units 1 and 2 Reactor Building Vent Plenums also provide the capability for radioactive iodine and particulate sampling in accordance with Item II.F.1.2. Included in Enclosure 2 are proposed revisions to Units 1 and 2 Administrative Technical Specifications which would require an administrative program to ensure post-accident sampling and analysis capability. The proposed changes are in accordance with the staff guidance.

(e) STAFF GUIDANCE - CONTAINMENT HIGH RANGE RADIATION MONITOR (II.F.1.3)

"A minimum of two in containment radiation-level monitors with a maximum range of 10⁸ rad/hr (10⁷ rad/hr for photon only) should be operable at all times except for cold shutdown and refueling outages. In case of failure of the monitor, appropriate actions should be taken to restore its operational capability as soon as possible. If the monitor is not restored to operable condition within 7 days after the failure, a special report should be submitted to the NRC within 14 days following the event, outlining the cause of inoperability, actions taken and the planned schedule for restoring the equipment to operable status.

Typical surveillance requirements are presented in Enclosure 3. The setpoint for the high radiation level alarm should be determined such that spurious alarms will be precluded. Note that the acceptable calibration techniques for these monitors are discussed in NUREG-0737."

RESPONSE

In response to Item II.F.1.3, each of the Hatch units was provided with two in-containment gamma radiation monitors having ranges of 1 to 10⁷ R/hr. Enclosure 2 contains proposed revisions to the Units 1 and 2 Technical Specifications which would add these monitors to the lists of accident monitoring instruments. Proposed LCO and surveillance requirements are in accordance with the staff guidance. The setpoint for the high radiation alarm is 100 R/hr which is sufficiently higher than the normal containment radiation level to preclude spurious alarms. The calibration method to be used for these monitors complies with the guidance provided in NUREG-0737.

(f) STAFF GUIDANCE - CONTAINMENT PRESSURE MONITOR (II.F.1.4)

"Containment pressure should be continuously indicated in the control room of each operating reactor during Power Operation and Startup Modes. Two channels should be operable at all times when the reactor is operating in any of the above mentioned modes. Technical Specifications for these monitors should be included with other accident monitoring instrumentation in the present Technical Specifications. Limiting conditions for operation (LCO) for the containment pressure monitor should be similar to other accident monitoring instrumentation included in the present Technical Specifications. Typical acceptable LCO and surveillance requirements for accident monitoring instrumentation are included in Enclosure 3."

Each of the Hatch units was provided with two channels of high range (0 to 250 psig) drywell pressure monitoring in response to this item. These monitors supplement previously existing (-10 to +90 psig) menitors to provide the capability required by Item II.F.1.4. Enclosure 2 contains proposed revisions to Units 1 and 2 Technical Specifications which would add the high range pressure monitors to the lists of accident monitoring instruments. The proposed LCO and surveillance requirements are similar to those for the previously existing drywell pressure monitors.

(g) STAFF GUIDANCE - CONTAINMENT WATER LEVEL MONITOR (II.F.1.5)

"A continuous indication of suppression pool water level should be provided in the control room of each operating reactor during Power Operation and Startup Modes. Two channels should be operable at all times when the reactor is operating in any of the above mentioned modes. Technical Specifications for suppression pool water level monitors should be included with other accident monitoring instrumentation in the present Technical Specifications. Limiting conditions for operation (LCO) for these monitors should be similar to other accident monitoring instrumentation included in the present Technical Specifications. Typical acceptable LCO and surveillance requirements for accident monitoring instrumentation are included in Enclosure 3. The BWRs with dry containment should have at least two channels for wide range instruments and one channel of narrow range instrument operable at all times during above mentioned modes. LCCs for wide range monitors should be similar to that discussed above. LCOs for narrow range monitor should include the requirement that the inoperable france will be restored to operable status within 30 days or the reactor will be brought to hot shutdown condition as required by other accident monitoring instrumentation."

RESPONSE

Previously existing wide range containment water level monitors provided the capability required by Item II.F.1.5 with the exception of invironmental qualification. The monitors have been upgraded to the appropriate environmental standards. Units 1 and 2 Technical Specifications for accident monitoring instruments currently contain appropriate LCO and surveillance requirements for these monitors.

(h) STAFF GUIDANCE - CONTAINMENT HYDROGEN MONITOR (II.F.1.6)

"Two independent containment hydrogen monitors should be operable (should be capable of performing the required function) at all times when the reactor is operating in Power Operation and Startup Modes. Technical Specifications for hydrogen monitors should be included with other accident monitoring instrumentation in the present Technical Specification. Typical acceptable LCO and surveillance requirements are included in Enclosure 3."

Previously existing containment hydrogen/oxygen monitors provided the capability required by Item II.F.1.6 with the exception of environmental qualification. The monitors are presently being modified to meet the appropriate environmental standards. Units 1 and 2 Technical Specifications for accident monitoring instruments contain LCO and surveillance requirements for these monitors. Our Technical Specification amendment proposal dated December 21, 1983 requests changes to reflect modifications to these monitors. No further changes are considered necessary.

(i) STAFF GUIDANCE - CONTROL ROOM HABITABILITY REQUIREMENTS (III.D.3.4)

"Licensees should assure that control room operators will be adequately protected against the effects of the accidental release of toxic and/or radioactive gases and that the nuclear power plant can be safely operated or shut down under design basis accident conditions. If the results of the analyses of postulated accidental release of toxic gases (at or near the plant) indicated a need for installing the toxic gas detection system, it should be included in the Technical Specifications. Typical acceptable LCC and surveillance requirements for such a detection system (e.g. chlorine detection system) are provided in Enclosure 3. All detection systems should be included in the Technical Specifications. In addition to the above requirements, other aspects of the control room habitability requirements should be included in the Technical Specifications for control room emergency air filtration system. Two independent control room emergency air filtration system should be operable continuously during all modes of plant operation and capable of meeting design requirements. Sample Technical Specifications are provided in Enclosure 3."

RESPONSE

Our submittal dated December 31, 1980 provided an evaluation of the Hatch control room habitability with respect to the criteria of Item III.D.3.4. The results of the evaluation indicated that the previously existing control room air intake chlorine monitors provided the required protection of operators against a toxic gas release. Technical Specifications for the chlorine monitors and the control room emergency filtration systems were discussed in the evaluation. The NRC letter dated March 9, 1982 transmitted a Safety Evaluation in which the GPC position on Item III.D.3.4 was accepted.

ENCLOSURE 2

NRC DOCKETS 50-321, 50-366 OPERATING LICENSES DPR-57, NPF-5 EDWIN I. HATCH NUCLEAR PLANT UNITS 1, 2 REQUEST TO AMEND TECHNICAL SPECIFICATIONS-TMI ACTION PLAN ITEMS

The proposed changes to Unit 1 Technical Specifications (Appendix A to Operating License DPR-57) would be incorporated as follows:

Remove Page	Insert Page
3.2-22	3.2-22
	3.2-22a
5.2-23	3.2-23
	3.2-23a
	3.2-48a
3.2-49	3.2-49
3.2-68	3.2-68
	6-22

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