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Georgia Power

the southern electric system

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

NED-84-275

May 25, 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 DOCKET 50-321
OPERATING LICENSE DPR-57
EDWIN I. HATCH NUCLEAR PLANT UNIT 1
ONE TIME EXTENSION OF RHR SURVEILLANCE INTERVAL

Pursuant to 10 CFR 50.90, as required by 10 CFR 50.59(c)(1), Georgia Power Company hereby requests a change to the Technical Specifications, Appendix A to the operating license.

The proposed change is a one-time extension of Surveillance Requirement 4.5.B.1.a., which requires air testing of the drywell and torus headers and nozzles once per 5 years to demonstrate operability of the containment cooling mode of RHR. Under current requirements, which include a 25 percent grace period, the surveillances must be performed prior to June 19, 1984, (torus) and June 22, 1984 (drywell). In order to prevent a unit shutdown solely for the performance of this surveillance, we hereby request an extension of the surveillance interval until the end of cycle 8, scheduled approximately for September 1, 1984. The extension would be the equivalent of extending the grace period from 25 to approximately 30 percent.

The Plant Review Board has reviewed the proposed change and determined that it does not involve an unreviewed safety question. Accident probabilities and consequences are not increased above those analyzed in the FSAR. The purpose of the containment spray system is to reduce primary containment pressure following a design basis accident. The long term pressure and temperature response of the primary containment is analyzed in Section 14.4.3.3.2 of the FSAR. Cases are analyzed for several RHR system conditions, including no containment spray. The effect of no containment spray is a higher secondary peak containment pressure (14.3 versus 11.8 psig). As stated in the FSAR, this is inconsequential since it is bounded by the initial peak pressure and is far below the design containment pressure of 56 psig. Thus, operability of the containment spray system is not required to meet the design basis. The requested surveillance interval extension results in only a small additional probability that potential system inoperability might remain undetected. No new accidents are created. The margin of safety is not affected by this change.

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U. S. Nuclear Regulatory Commission
Director of Reactor Regulation
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Attachment 1 details our determination, pursuant to 10 CFR 50.92, that the proposed amendment does not involve significant hazards considerations. In order to avoid unit shutdown, it is necessary that we obtain staff review and issuance of the license amendment prior to the surveillance due date of June 19, 1984. This will require an exemption from prior notice and opportunity for a hearing or for public comment under the provisions of 10 CFR 50.91(a)(5). We hereby request such an exemption. 10 CFR 50.91(a)(5) further states that the licensee must explain why the emergency situation occurred. In this case, failure to schedule the surveillance in a prior outage was due to an isolated problem in the site surveillance assignment system. The missed assignment was not detected until it was recently identified by the followup tickler file maintained by the site Regulatory Compliance staff. Due to this late discovery, we must request emergency licensing relief to avoid unit shutdown.

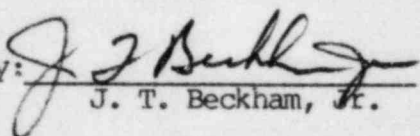
Should an outage of sufficient duration to perform the subject surveillance occur, either before or after approval of the requested exemption, we will perform the surveillance at that time.

Enclosed along with the proposed changes is a determination of amendment class and payment of applicable licensing fees.

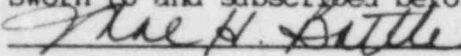
Pursuant to the requirements of 10 CFR 50.91, Mr. J. L. Ledbetter of the Environmental Protection Division of the Georgia Department of Natural Resources will be sent a copy of this letter and all applicable attachments.

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 25th day of May, 1984.


Notary Public, Georgia, State at Large
My Commission Expires Sept. 18, 1987
Notary Public

REB/
Enclosures

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

ATTACHMENT 1
NRC DOCKET 30-321
OPERATING LICENSE DPR-57
EDWIN I. HATCH NUCLEAR PLANT UNIT 1
DETERMINATION OF NO SIGNIFICANT HAZARDS

1. One-time extension of surveillance requirement for drywell and torus containment spray system headers and nozzles.

BASIS

This change is not a significant hazards consideration in that:

- 1) It does not involve a significant increase in the probability or consequences of an accident previously evaluated. The requested one-time surveillance interval extension involves a system that is not required to meet design basis conditions. The FSAR accident analysis does not assume operability of the system. Therefore, the slight increase in probability of potential system inoperability remaining undetected, due to the extended surveillance interval, has no effect on analyzed accidents.
- 2) It does not create the possibility of a new or different kind of accident from any accident previously evaluated, since no new modes of operation are involved.
- 3) It does not involve a significant reduction in a margin of safety. The margin of safety would be maintained without operability of the system.

ATTACHMENT 2

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, a one-time extension of a surveillance interval.
- e) The proposed amendment is therefore a Class III amendment.

ATTACHMENT 3
NRC DOCKET 50-321
EDWIN I. HATCH NUCLEAR PLANT UNIT 2
PROPOSED CHANGE TO TECHNICAL SPECIFICATIONS

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

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3.5-2

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