



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

50-321/364

August 29, 1995

Mr. J. T. Beckham, Jr.
Vice President - Plant Hatch
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P. O. Box 1295
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SUBJECT: THIRD INSERVICE TESTING INTERVAL PROGRAM UPDATE - EDWIN I. HATCH
NUCLEAR PLANT, UNITS 1 AND 2 (TAC NOS. M93301 AND M93302)

Dear Mr. Beckham:

By letter dated July 25, 1995, you requested NRC staff's approval for the Edwin I. Hatch Nuclear Plant Inservice Testing (IST) Program Update for the third 10-year interval which will begin January 1, 1996.

You indicated that the guidance contained in Section 3.3.3 of NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants," will be used for the implementation of the updated program. By September 15, 1995, the updated program will be submitted to the NRC for review and approval of relief requests. The implementation will begin January 1, 1996, with a phased-in approach of the revised procedures over the subsequent 8 months. Completion of all of the necessary procedure revisions is expected by September 1, 1996. In Section 3.3.3, the NRC staff recommends that procedures be revised such that the initial testing performed in the new interval be in compliance with the revised program. However, if additional time is necessary, the licensee should submit a schedule to the NRC prior to the beginning of the interval. Your schedule of 8 months for completing procedure revisions for the implementation of the IST program is considered reasonable, because the changes in the code requirements do not result in a major redirection in the methods of performing testing.

Specifically, you requested approval to use the 1990 Edition of the American Society of Mechanical Engineers (ASME) Operations and Maintenance (OM) Code for developing and implementing the IST program, with the 1995 Edition applied for safety and relief devices (i.e., Appendix I to the 1995 Edition would be used in lieu of Appendix I to the 1990 Edition). Currently, the OM Standards for pump and valve testing are incorporated by reference in paragraph (b) of 10 CFR 50.55a through reference in Section XI of the ASME Boiler and Pressure Vessel Code. The 1990 Edition of the OM Code contains essentially the same requirements as the OM Standards with the exception that the general administrative requirements which were previously covered by Subsection IWA of Section XI are now included in Subsection ISTA of the OM Code.

Relative to using the more recent edition of Appendix I, the 1995 Edition corrects several editorial problems and clarifies a number of issues from the earlier editions based on input from those licensees who have already updated their IST programs to the OM Standards. Several clarifications are discussed

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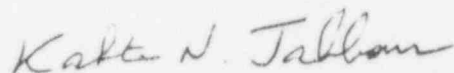
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in Section 4.3.9 of NUREG-1482. The NRC staff has participated in the development of the revisions to Appendix I through membership on the ASME OM Working Group and finds that the differences between the 1990 Edition and the 1995 Edition of Appendix I are minor. Additionally, implementing only the portion of the 1995 Edition of the OM Code that addresses testing of pressure relief devices is acceptable in that the appendix is essentially complete (i.e., both the 1990 Edition and the 1995 Edition reference Appendix I for the requirements for testing pressure relief devices). The 1995 Edition of the OM Code does include a clarification in the scope of the pressure relief devices that are subject to IST. Since the change is a clarification and not a change in the definition of the scope, it is not necessary to impose the revised scope statement from Subsection ISTC of the 1995 Edition of the Code. However, it should be noted that the OM Code scope for IST of pressure relief devices is different from the scope of the 1980 Edition of Section XI, with Winter 1981 Addenda, which was previously used at the Hatch Plant (refer to Section 4.3.1 of NUREG-1482).

Because the testing will be performed in accordance with requirements that are essentially the same as those referenced in the current regulations, and will be implemented in a reasonable time period, the proposed plan will provide an acceptable level of quality and safety for IST of pump and valves at the Hatch Nuclear Plant. Therefore, the proposed alternative is authorized pursuant to 10 CFR 50.55a(a)(3)(i).

This completes our action with respect to the above TACs. If you have any questions regarding this matter, please contact me at (301) 415-1496.

Sincerely,



Kahtan N. Jabbour, Senior Project Manager
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Office of Nuclear Reactor Regulation

Docket Nos. 50-321 and 50-366

cc w/encl: See next page

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