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



NED-84-305

June 15, 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
RESPONSE TO NRC LETTER 84-11

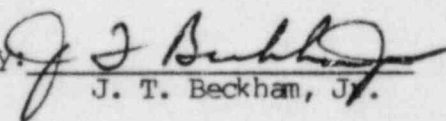
Gentlemen:

Pursuant to the requirements of NRC Generic Letter 84-11 dated April 19, 1984 concerning the inspection of BWR stainless steel piping, Georgia Power Company hereby submits its current plans relative to inspections for intergranular stress corrosion cracking and leakage detection. Enclosed as Attachments 1 and 2 are the responses for Hatch Units 1 and 2, respectively.

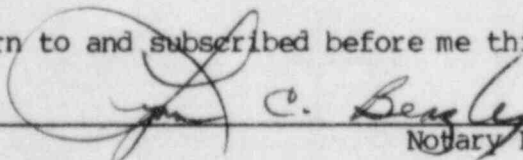
Should you have any questions in this regard, please contact this office.

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 15th day of June, 1984.



Notary Public

JAE/mb

Enclosure

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

Notary Public, Georgia, State at Large
My Commission Expires July 26, 1985

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ATTACHMENT 1

Hatch Unit 1 Response to NRC Generic Letter 84-11

By letter dated May 31, 1984, Georgia Power Company submitted to NRC, as required by your letter dated February 11, 1983, its proposed inspection plans for the Hatch Unit 1 Fall 1984 maintenance/refueling outage. These proposed plans meet the intent of the NRC staff's recommended actions as identified in NRC Generic Letter 84-11 dated April 19, 1984.

Pursuant to the requirements of NRC Generic Letter 84-11, we wish to address the following items relative to Hatch Unit 1:

(a) Scope and schedule of planned inspections

Please refer to Enclosure 1, Section 2.1 of our May 31, 1984 letter. That particular section addresses the proposed scope of examinations for the stainless steel recirculation, RHR, and RWCU piping welds at Hatch Unit 1 and schedule thereof.

(b) Availability and qualification

Please refer to Enclosure 1, Section 2.2 of our May 31, 1984 letter. That particular section addresses the inspection procedure to be used during the examination of the subject piping and personnel qualification. Availability of examination personnel is not expected at this time to be a problem as contract personnel will be used in addition to the examination personnel of Southern Company Services' Inservice Inspection Group.

(c) Description of any special surveillance measures, in effect or proposed, for primary system leak detection, beyond those measures required by Technical Specifications

Please refer to Enclosure 1, Section 2.5 of our May 31, 1984 letter. That particular section addresses leak detection and leakage limits for the next fuel cycle. No measures above those identified in the aforementioned letter are planned at this time.

(d) Results of the Bulletin inspections not previously submitted to NRC

This item is not applicable to Hatch Unit 1 since there have been no Bulletin inspections performed on the subject stainless steel piping welds since the Fall 1982 maintenance/refueling outage.

(e) Remedial measures, if any, to be taken when cracks are discovered

Please refer to Enclosure 1, Section 2.4 of our May 31, 1984 letter. That particular section addresses criteria for flaw evaluation and weld overlay repair. These criteria are consistent with those specified in Attachment 2 of NRC Generic Letter 84-11. In addition, while there has been no commitment made to NRC to replace the Hatch Unit 1 piping, replacement piping similar to that currently being installed at Hatch Unit 2 is on order should replacement be necessary.

ATTACHMENT 2

Hatch Unit 2 Response to NRC Generic Letter 84-11

Since Georgia Power Company is currently in the process of replacing the existing stainless steel piping in the recirculation, RHR, and RWCU systems at Hatch Unit 2 with Type 316 Nuclear Grade piping, it proposes an alternative approach as discussed herein to resolving any future intergranular stress corrosion cracking (IGSCC) concerns as addressed in NRC Generic Letter 84-11.

As noted above, the existing piping material from the aforementioned systems is being replaced with nuclear grade piping material (Type 316 NG). The RWCU piping is to be replaced only to the inboard isolation valve thus allowing retention of the existing piping penetration. The short length (approx. 6 ft.) of existing Class 1 RWCU piping from the piping penetration "flued head" to the outboard isolation valve will be retained. Tentative plans during the current outage are to volumetrically examine the piping welds (approx. 3 welds) of the retained piping and if no crack-like indications are observed, those particular welds would most likely be treated using some residual stress improvement method, e.g., induction heat stress improvement (IHSI), last pass heat sink welding (LPHSW).

Although nuclear grade piping is being installed in the recirculation, RHR, and RWCU systems, except as noted above, Georgia Power Company has decided to IHSI the new piping welds as an additional countermeasure to preclude any possible future cracking of the piping due to IGSCC.

Pursuant to the requirements of NRC Generic Letter 84-11, we wish to address the following items relative to Hatch Unit 2:

(a) Scope and schedule of planned inspections

Since the piping in the recirculation, RHR, and RWCU systems is being replaced, except as noted above, with nuclear grade material and will be treated using IHSI, Georgia Power Company feels that augmented inservice inspection is no longer warranted. Consequently, commencing with the next regularly scheduled maintenance/refueling outage, examinations of the new piping will be performed in accordance with the schedule requirements of the ASME Section XI Code, i.e., 25% of each pipe size in 10 years for Class 1 welds.

Should the retained section of the RWCU piping be free of crack-like indications and treated using some residual stress improvement method such as IHSI or LPHSW, future examinations would be conducted in a manner similar to that discussed above.

(b) Availability and qualification of examiners

Availability of examination personnel is not foreseen as being a problem at this time. Southern Company Services (SCS) most likely would perform the necessary inspections with assistance from contract personnel, as appropriate.

The process of qualification of all personnel who will perform evaluations most likely would be that process presently in effect at the EPRI NDE Center. Currently, SCS has in its employ five Levels II and III personnel who have qualified at that facility by practical demonstration. Nondestructive examination personnel under contract to SCS who have qualified at the EPRI NDE Center in the detection and interpretation of IGSCC may also perform examinations and evaluations, as appropriate.

(c) Description of any special surveillance measures, in effect or proposed, for primary system leak detection, beyond those measures already required by Technical Specifications

By letters dated May 25, June 2, and June 7, 1983, Georgia Power Company committed to augment reactor coolant leakage surveillance as a result of having observed unacceptable crack-like indications in recirculation and RHR piping welds during the Spring 1983 maintenance/refueling outage. Your confirmatory order dated July 8, 1983 acknowledged these commitments and authorized plant restart. The commitments made related to the augmented reactor coolant leakage surveillance meet the intent of the leak detection and leakage limits discussed in Attachment 1 of NRC Generic Letter 84-11. The augmented surveillance for reactor coolant leakage will be retained as a measure of conservatism even though conforming piping material (as defined in NUREG-0313, Rev. 1) is being used in the piping replacement currently in progress.

In addition to the above, a visual examination for leakage of the reactor coolant piping will be performed during each plant outage in which the containment is deaerated. The examination will be performed consistent with the requirements of IWA-5241 and IWA-5242 of the 1980 Edition of the ASME Section XI Code. The system boundary subject to this examination will be in accordance with IWA-5221. This examination is consistent with that identified in Attachment 1 to NRC Generic Letter 84-11.

(d) Results of the Bulletin inspections not previously submitted to NRC

This item is not applicable to Hatch Unit 2 since there have been no Bulletin inspections conducted on the subject stainless steel piping since the Spring 1983 maintenance/refueling outage.

(e) Remedial measures, if any, to be taken when cracks are discovered

Although the existing piping is being replaced with nuclear grade material, except as noted above, and is to be treated using IHSI, future cracking, although unlikely, could possibly occur. Should IGSCC occur in the new material, remedial measures have not been determined at this time.

With regard to remedial measures for the retained section of Class 1 RWCU piping as described above, should unacceptable crack-like indications be observed, that particular section of piping would most likely be replaced with nuclear grade material and installed using some residual stress improvement method, e.g., IHSI, LPHSW, etc.