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Georgia Power

*the southern electric system*

NED-84-383

July 17, 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  
EQUIPMENT QUALIFICATION PROGRAM DEADLINE  
EXTENSION REQUEST FOR HYDROGEN/OXYGEN ANALYZERS

Gentlemen:

Recently, Georgia Power Company (GPC) determined that the upcoming refueling outage for Plant Hatch Unit 1 will last approximately ten weeks, beginning around October 1, 1984. The details of this decision are outlined in two previous GPC submittals to the NRC dated May 31 and July 6, 1984 (NED-84-280 and NED-84-369, respectively).

GPC is in the process of installing new Camsip-Delphi drywell hydrogen (H<sub>2</sub>) and Oxygen (O<sub>2</sub>) Analyzers on Hatch-2 as part of the effort to meet the requirements of 10 CFR 50.49. It is currently estimated that this work will have required 25 weeks of outage time (and 16,300 craft man-hours) when it is completed prior to unit startup. Since installation of this new equipment requires complete removal of the existing analyzers, this work must be performed while the unit is shutdown and completed during the outage in which it was begun. GPC had originally intended to install new H<sub>2</sub> and O<sub>2</sub> analyzers on Unit 1 during the upcoming outage, in order to meet the deadline requirements of 10 CFR 50.49(g). However, since this installation would not be feasible during a ten week outage, the latest planning calls for replacement of the existing Unit 1 analyzers during the refueling outage scheduled for the Fall of 1985. Therefore, GPC requests that a qualification deadline extension to November 30, 1985 be granted, under the provisions of 10 CFR 50.49(g), for the existing Hatch-1 H<sub>2</sub> and O<sub>2</sub> analyzers.

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GPC has been proceeding with the installation of the Hatch-2 analyzers, even though the qualification testing for this new equipment is far from complete, with the expectation that the analyzers will be found suitable for use at Plant Hatch. Comsip, Inc. recently informed GPC that the qualification testing program schedule had been delayed due to procurement problems. The current schedule for qualification testing and analysis for the H<sub>2</sub> and O<sub>2</sub> analyzers for both Hatch units (same analyzer models will be used on both units) is outlined in Enclosure 1. GPC expects to be able to declare these analyzers as fully qualified for use at Plant Hatch by the end of 1984, using the results of the Comsip 30-day interim test report. The final 180-day LOCA test will be performed only as an additional confirmation of qualification.

Hatch-2 is currently scheduled to restart in late July 1984. Since the H<sub>2</sub> and O<sub>2</sub> analyzers will probably not be qualified until the end of 1984, GPC requests that a qualification deadline extension to March 31, 1985 be granted, under the provisions of 10 CFR 50.49(g), for the new Hatch-2 H<sub>2</sub> and O<sub>2</sub> analyzers. The additional time requested beyond the end of 1984 would allow for any unforeseen delays which could occur during the qualification testing process.

GPC has made a diligent effort to meet the requirements of 10 CFR 50.49 within the time prescribed in paragraph (g) of that rule. Plant Hatch has embarked on an extensive program of backfitting and equipment replacement to ensure that all applicable equipment meets the intent of 10 CFR 50.49. In many cases GPC has performed costly and time-consuming replacements of equipment rather than relying on marginally-acceptable engineering analyses to prove that necessary equipment would perform its intended function during or after an accident.

GPC believes that the superiority of the new Comsip-Delphi H<sub>2</sub> and O<sub>2</sub> analyzers over the equipment which they replace in terms of expected instrument reliability, as well as qualification assurance, outweighs the problems and delays experienced during installation and testing. The long-term gain in overall plant safety and performance expected from these new devices justifies the requested short-term extensions of the qualification deadlines; also GPC has submitted "Justifications for Continued Operation" for the plant using the instruments which these new analyzers will replace.

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GPC is prepared to meet with the NRC staff regarding this extension request on a mutually agreeable date as soon as possible, should you desire such a meeting.

Very truly yours,



L. T. Guwa

CBS/mb

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

ENCLOSURE 1

NRC DOCKETS 50-321, 50-366  
OPERATING LICENSES DPR-57, NPF-5  
EDWIN I. HATCH NUCLEAR PLANT UNITS 1, 2  
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The following is the Comsip, Inc. schedule for completion of qualification testing for the H<sub>2</sub> and O<sub>2</sub> analyzers procured for use in Plant Hatch Units 1 and 2 as of June 12, 1984:

<u>Testing/Reporting Phase</u>	<u>Predicted Completion Date</u>
Thermal Aging	August 16, 1984
Radiation Aging	August 20, 1984
Seismic Aging	August 27, 1984
Initiation of LOCA Test	September 7, 1984
30 Day LOCA Test	October 7, 1984
30 Day Interim Test Report	October 19, 1984
180 Day LOCA Test	March 5, 1985
Final Test Report	April 16, 1985