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C. K. McCoy Vice President, Nuclear Vogtle Project



November 20, 1995

LCV-0670

Docket Nos. 50-424 50-425

> TAC- M92131 M92132

U. S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, D. C. 20555

Gentlemen:

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## VOGTLE ELECTRIC GENERATING PLANT PROPOSED CONVERSION OF THE UNIT 1 AND UNIT 2 TECHNICAL SPECIFICATIONS BASED ON NUREG-1431

By letter dated May 1, 1995, (LCV-0603) Georgia Power Company (GPC) proposed to amend the Vogtle Electric Generating Plant (VEGP) Unit 1 and Unit 2 Technical Specifications. The proposed amendment would, in part, convert the existing VEGP TS requirements to the format and content of NUREG-1431. the Westinghouse Improved Standard Technical Specifications. Subsequent to our May 1, 1995, submittal, GPC has identified additional changes that are required to maintain the VEGP current licensing basis. Specifically, GPC has identified the following items:

- Response time test surveillance requirements for the Control Room Emergency Filtration System radiogas monitors and for the Auxiliary Feedwater System response to a loss of voltage and degraded voltage condition on the Engineered Safety Features (ESF) 4.16 kV buses should be added to the VEGP Improved Technical Specifications (ITS). The need to add the response time surveillances to the VEGP ITS is a direct result of the requirement to separate the associated instrument functions from the current VEGP ESF Actuation System TS in order to conform with the format and presentation of the Improved Technical Specifications in NUREG-1431.
- The NUREG-1431 ESF Actuation System surveillance requirement to perform a channel check on the Pressurizer Pressure P-11 interlock was found to be inconsistent with the current VEGP licensing basis and has been deleted.

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- Additional clarification is required in the Bases of the Auxiliary Feedwater (AFW) System Technical Specification. Specifically, Surveillance Requirement 3.7.5.1 of the AFW Specification requires the addition of a bases statement to enhance understanding of the NUREG-1431 terminology and its specific application to VEGP.
- 4. The surveillance frequency of the Channel Operational Test for the Turbine Trip low fluid oil pressure was also found to need additional clarification in order to conform with the format and presentation of the Improved Technical Specification; in NUREG-1431.

GPC proposes to revise the May 1, 1995 submittal to incorporate the changes described above.

The enclosed pages contain the information necessary to modify our May 1, 1995, submittal to reflect the above revisions. Instructions are provided to facilitate insertion of the changed pages into the original submittal documentation.

Sincerely,

С.К. М. С. С.К. МсСоу 7

CKM/NJS

Enclosure

xc: <u>Georgia Power Company</u> Mr. J. B. Beasley, Jr. Mr. M. Sheibani NORMS

> U. S. Nuclear Regulatory Commission Mr. S. D. Ebneter, Regional Administrator Mr. L. L. Wheeler, Licensing Project Manager, NRR Mr. C. R. Ogle, Senior Resident Inspector, Vogtle

The following pages replace the corresponding pages behind the Enclosure 1 tab for Chapter 3.3, Volume 3.