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THE SOUTHERN ELECTRIC SYSTEM

W. G. Hairston, III  
Senior Vice President  
Nuclear Operations

HL-2161  
003248

April 16, 1992

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

PLANT HATCH - UNITS 1, 2  
NRC DOCKETS 50-321, 50-366  
OPERATING LICENSES DPR-57, NPF-5  
SECOND 10-YEAR INSPECTION INTERVAL  
IST PROGRAM SAFETY EVALUATION

Gentlemen:

By letter dated December 10, 1991, the NRC transmitted a Safety Evaluation (SE) on Georgia Power Company's (GPCs) Second 10-Year Inspection Interval IST Program. The SE concluded the IST program is acceptable for implementation provided the items identified in Appendix A of the SE are addressed within the time frame specified.

GPC has completed a review of the SE and requests a mid-April meeting or telephone conference call with appropriate NRC personnel to address the items contained in Appendix A. The enclosed tables provide a summary of GPC's comments on the items and are arranged to categorize the items as follows:

- Table 1: For these items, GPC agrees with the SE position and proposes to submit revised relief requests. Implementation of the necessary program, plan, and procedure changes will be completed by September 16, 1992.
- Table 2: For these items, GPC proposes to submit additional justification and revised relief requests by June 1, 1992. Implementation of the necessary program, plan, and procedure changes will be completed within 6 months after receipt of a response.

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Table 3: These items require additional investigation and potentially extensive program revisions. GPC will submit a response for each item by November 17, 1992 which may include a request to extend action and implementation schedules.

We will contact the appropriate NRC staff personnel to arrange for a meeting or conference call. If you have any questions, please contact this office.

Sincerely,



W. G. Hairston, III

JKB/cr

cc: Georgia Power Company

Mr. H. L. Sumner, General Manager - Nuclear Plant  
NORMS

U.S. Nuclear Regulatory Commission, Washington, D.C.

Mr. K. Jabbour, Licensing Project Manager - Hatch

U.S. Nuclear Regulatory Commission, Region II

Mr. S. D. Elmeter, Regional Administrator

Mr. L. D. Wert, Senior Resident Inspector - Hatch

Georgia Power Company agrees with the SER position on the following Appendix A Items and proposes to submit revised relief requests as noted below for NRC review. Implementation of the necessary Program, Plan, and Procedure changes will be completed by September 16, 1992.

ITEM #	SER POSITION	GPC POSITION	PROPOSED RESOLUTION
A3	Interim relief requested by October 8, 1990 letter from Code vibration instrument accuracy requirements no longer required.	Request was for temporary relief only.	No action required.
A6	RR-V-2 references F51-F016 which is not listed elsewhere in the Program.	Typo.	Revise RR-V-2 to reference E51-F007.
A10	Closing time for No. 1 AOV Vent and Drain AOV's not identified and F011 operation not correctly described.	Typo.	Revise RR-V-39 to reflect stroke times and description.
A12	HCU Accumulator Charging Header Check Valves incorrectly categorized.	Typo.	Revise RR-V-26 to change from Category B to Category C.
A19	CS-7 is identified as being applicable to HPCI but lists both HPCI and RCIC system valves.	Typo.	Revise CS-7 to include RCIC.
A22	PSW to ECCS Room cooler AOV's are incorrect categorized as Category C.	Typo.	Revise RR-V-20 to change from category C to B.
A29	Submission and approval of a relief request is required for disassembly and inspection of the Core Spray Pump minimum flow line check valves.	RR-V-21 was inadvertently withdrawn from the most recent IS/ Program submittal.	RR-V-21 will be re-developed and submitted.

Georgia Power Company proposes to submit additional justification and revised relief requests for the following Appendix A Items by June 1, 1992. Implementation of the necessary Program, Plan, and Procedure changes will be completed within 6 months after receipt of a response from the NRC.

ITEM #	SER POSITION	GPC POSITION	PROPOSED RESOLUTION
A1 A2	If OM-6 is used in its entirety, relief is not necessary.	ASME Code Case N-465 was issued after GPC IST Program submittal.	Use OM-6, 1990 as basis for Pump IST. Revise RR-P-6 to request relief from OM-6 scope and use scope of Section XI, IWP.
A4	Inadequate technical justification for not complying with Code instrument accuracy requirements for all pumps in the IST Program.	Discussion of instrumentation limitations for Unit 1 Core Spray and Unit 2 RHR Service Water pumps was inadvertently omitted.	Use OM-6, 1990 as basis for Pump IST. Revise RR-P-7 to request relief from OM-6 instrumentation accuracy requirements, as necessary.
A5	Relief is not necessary since bearings are in process fluid flow path.	Relief was required at the time of submittal from the requirements of Section XI, IWP.	Use OM-6, 1990 as basis for Pump IST. Withdraw RR-P-4 since OM-6 does not require bearing lubricant level or pressure observation.
A8	Specific relief must be requested for valves in flow paths which are not specifically addressed in Tech Specs if corrective action and Code required testing will not be completed prior to plant startup from a RFO or Cold S/D.	Plant Tech Specs provide the requirements and plant conditions necessary for startup.	Revise RR-V-4 to clarify that T.S. will be utilized to determine plant requirements for startup, but that if the plant is started up from the C/S or R/F mode with a component inoperable due to corrective actions required by ASME Section XI testing, a mode of operation that would prevent performance of post corrective action testing will <u>not</u> be entered into.
A9	Main Steam SRV Vacuum Breakers on the discharge of relief of ADS valves should be exercised during cold shutdowns when the drywell is de-inerted.	Current testing is believed appropriate.	Develop additional justification.
A15 A18	Verify closure of HPCI and RCIC Min Flow, Turbine Exhaust Drain, and Turbine Exhaust Check Valves quarterly or during cold shutdowns.	In order to reverse flow test these valves quarterly during power operation, the HPCI or RCIC system must be tagged out. Current testing is believed appropriate.	Develop additional justification.
A17	Develop method to partial stroke exercise the HPCI Torus Suction Check Valve with flow following disassembly and inspection.	Exercising these valves with flow would require running HPCI taking suction from the Torus. The only discharge paths available are the Reactor Vessel and the Condensate Storage Tank. Neither of these are acceptable for receiving Torus water without significant impact on plant operations.	Revise RR-V-7 and 12 to indicate that all guidelines of Generic Letter 89-04, Position cannot be met.

Georgia Power Company proposes to submit additional justification and revised relief requests for the following Appendix A Items by June 1, 1992. Implementation of the necessary Program, Plan, and Procedure changes will be completed within 6 months after receipt of a response from the NRC.

ITEM #	SER POSITION	GPC POSITION	PROPOSED RESOLUTION
A21	Verify closure of RWCU Return Check Valves during Cold S/D.	A drywell entry is required in order to establish the necessary leak rate test boundary to perform this test. Additionally, RWCU must be taken out of service which may result in unnecessary fluctuations in reactor water chemistry.	Revise RR-V-18 to elaborate on the difficulties involved in performing this test during Cold S/D.
A25	Verify closure of each PSW discharge check valve during cold S/D unless a valve has been exercised closed during normal PSW pump rotation during the previous three months.	PSW pumps are individually tested quarterly which confirms closure of the discharge check valve on the non-running pump in each train.	Revise RR-V-25 to clarify testing which is already being performed.
A27	CS-4 is inadequate because technical information has not been provided to evaluate the negative consequences of exercising the Turbine Building Service Water Supply Valves quarterly during power operation.	Control circuits do not allow partial closure of these valves. Full closure of one valve would reduce cooling water flow to components critical for plant operation such as Turbine Lube Oil Hx and Generator Stator Cooling.	Revise CS-4 to include technical justification for not exercising the subject valves.
A28	It does not appear that provisions have been made for exercising check valves identified for disassembly and inspection with flow following valve reassembly.	Partial stroke exercising should be performed after disassembly and inspection of check valves associated with Note 10 where possible.	Each check valve associated with Note 10 will be reviewed to determine if partial stroke exercising is possible. Note 10 will be revised to clarify partial stroke exercising is to be done post maintenance. For cases where partial stroke exercising is impractical, appropriate relief requests will be submitted or alternate testing identified.

The following Appendix A Items require investigation and potential extensive Program changes. The SER allowed 12 months (12/17/92) or the end of the next RFD, whichever is longer, for resolution. GPC will provide a response for each item by 11/17/92 which may include actions and implementation schedules extending beyond 12/17/92.

ITEM #	SER POSITION	GPC POSITION	PROPOSED RESOLUTION
A7	PIV's should be tested according to function. For dual function CIV/PIV's which receive only a CIV leak rate test, demonstrate that this testing bounds Section XI leak rate testing or otherwise verifies the valve's ability to perform its PIV function.	Calculations performed using equations in Section XI indicate that the CIV leak rate test is conservative.	Perform additional calculations and testing to support RR-V-4. Make any necessary Program revisions as a result of this study.
A10	A method should be developed for monitoring and detecting degradation of the SDV Vent and Drain AOV's.	All 6 valves are controlled with a single switch in the Main Control Room. This method actuates a single pilot solenoid which is not connected to RPS logic and does not result in stroke times which are comparable to those obtained during each RFD. Stroking each valve individually would require manipulating energized control circuits (RPS) which could result in a reactor scram. This is done during RFD only.	Perform study to determine if other acceptable methods of monitoring and detecting degradation are available. Make any necessary Program revisions as a result of this study.
A11	A method should be developed for monitoring and detecting degradation of the TIP purge supply solenoid valves.	System modifications would be required to install position indication.	Perform study to determine if an acceptable method of monitoring and detecting degradation is available. Make any necessary Program revisions as a result of this study.
A13	Both RHR Injection Check Valves should be partial stroke exercised during each Cold S/D.	These check valves may be partial stroke exercised during SDC Mode of RHR. During a Cold S/D, both loops of RHR might not be utilized for SDC (depending on outage duration). Testing both valves may delay reactor startup and increase personnel exposure.	Revise RR-V-14 and 17 to add justification for not partial stroke exercising both valves during Cold S/D.
A13	Investigate and implement, if practicable, a method to demonstrate that the RHR Injection Check Valves fully open when subjected to SDC Flow.	Alternate methods may exist.	Perform study of alternatives to disassembly and inspection for these valves. Make any necessary Program revisions as a result of this study.
A14	A method should be developed for monitoring and detecting degradation of the RHRSW Hx Outlet MOV's.	Permissive logic must be disabled in order to full stroke these valves.	Perform a study to determine if an acceptable method of monitoring and detecting degradation is available. Make any necessary Program revisions as a result of this study.



The following Appendix A Items require investigation and potential extensive Program changes. The SER allowed 12 months (12/17/92) or the end of the next RFD, whichever is longer, for resolution. GPC will provide a response for each item by 11/17/92 which may include actions and implementation schedules extending beyond 12/17/92.

ITEM #	SER POSITION	GPC POSITION	PROPOSED RESOLUTION
A15	The Core Spray Injection Check Valves should be full stroke exercised using a mechanical exerciser per IWW-3522(b) or a full stroke exercise verified by non-intrusive techniques.	Since these valves do not see flow during any normal mode of operation or shutdown conditions and the installed test actuator is unreliable, disassembly and inspection of one of the two valves every second RFD is the only viable testing technique to verify forward flow operability.	Perform study of alternatives to disassembly and inspection for these valves. Make any necessary Program revisions as a result of this study.
A20	The RCIC system is designated a "safe shutdown system" and appropriate system components should be in the IST Program.	RCIC is not required for safe shutdown of the plant and only RCIC components required for containment isolation should be in the IST Program.	Provide additional justification for this position.
A22	Develop a method for monitoring and detecting degradation of the PSW to ECCS Room Cooler AOV's.	These valves have no indicating lights or position control switches. Stroke timing is accomplished by observing stem movement and verifying the time is less than a pre-determined value. This is the same type test recommended by the NRC to resolve Appendix Item 26.	Perform study to determine if other acceptable methods of monitoring and detecting degradation are available. Make any necessary Program revisions as a result of this study.
A23	The RHR, HPCI, and CS pump room cooler outlet check valves should be partial stroke exercised following disassembly and inspection. The SER implies this item be resolved within 6 months of receipt.	There is no suitable installed instrumentation available to determine if the CV strokes open when the associated pump room cooler is operated. The RHR/CS check valves have been removed.	Perform study of alternatives to disassembly and inspection for these valves. Make any Program revisions as a result of this study.
A24	The D/G PSW outlet check valves will be full stroke exercised during the D/G RFD testing and partial stroke exercised during the D/G quarterly testing. Power levels at which D/G is operated during this testing has not been identified to give assurance that the cooling water check valves are being appropriately exercised.	Flow elements installed downstream of the subject check valves were used for pre-op flow balancing and have not been maintained. D/G power levels achieved during testing should be adequate to exercise the subject check valves.	Perform study of D/G power levels achieved during RFD testing to show that maximum required accident flow through the subject check valves will be achieved. Provide results to NRC.
A26	A method should be developed for monitoring and detecting degradation of the Torus to Drywell Vacuum Breaker Air Supply Solenoid Valves.	The subject solenoid valves are passive containment isolation valves which are only opened to exercise the Torus to Drywell Vacuum Breakers per NRC request.	Since position indication is not available for these SOV's and they have no active safety function, the testing described in RR-V-31 should be appropriate.
3.2.3.1	A means to monitor and detect degradation of the NSSS SRV's should be developed.	In addition to exercising these valves once each RFD/18 Months, all pilot assemblies and at least 1 valve body is removed and tested by Wylie Labs.	Since RR-V-29 was <u>granted</u> and GPC has a program for removal and testing, no other action should be required.

The following Appendix A items require investigation and potential extensive Program changes. The SER allowed 12 months (12/17/92) or the end of the next RFO, whichever is longer, for resolution. GPC will provide a response for each item by 11/17/92 which may include actions and implementation schedules extending beyond 12/17/92.

ITEM #	S&Q POSITION	GPC POSITION	PROPOSED RESOLUTION
N/A	N/A	<p>The scope of the IST Program and Generic Letter 89-10 should be identical. Since both programs are intended to assure valve operability and detect degradation by appropriate testing intervals, GL 89-10 should be used in lieu of Section XI stroke timing.</p>	<p>Review testing approach for MOV's and provide a relief request if appropriate.</p>