

Georgia Power Company  
40 Inverness Center Parkway  
Post Office Box 1295  
Birmingham, Alabama 35201  
Telephone 205 877-7122

C. K. McCoy  
Vice President, Nuclear  
Vogtle Project



Georgia Power

the southern electric system

ELV-03576  
001353

4/28/92

Docket Nos. 50-424  
50-425

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

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT  
REQUEST TO REVISE TECHNICAL SPECIFICATION 4.3.4.2.d  
TURBINE OVERSPEED PROTECTION SYSTEM

In accordance with the provisions of 10 CFR 50.90 and 10 CFR 50.59, Georgia Power Company (GPC) hereby proposes to amend the Vogtle Electric Generating Plant (VEGP) Unit 1 and Unit 2 Technical Specifications, Appendix A to Operating Licenses NPF-68 and NPF-81. The proposed amendment would revise Technical Specification (TS) surveillance requirement 4.3.4.2.d regarding the periodic disassembly and inspection of the valves associated with the turbine overspeed protection system.

The proposed change and its basis are described in enclosure 1. Our evaluation pursuant to 10 CFR 50.92 showing that the proposed change does not involve significant hazards considerations is provided as enclosure 2. A markup of the affected page from the TS is provided as enclosure 3.

Georgia Power Company requests approval of the proposed amendment by December 31, 1992, so that the schedule for the March 1993 Unit 1 refueling outage can be established as appropriate. In accordance with 10 CFR 50.91, the designated state official will be sent a copy of this letter and all enclosures.

Mr. C. K. McCoy states that he is a 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 and enclosures are true.

GEORGIA POWER COMPANY

240070

By:

C. K. McCoy

Sworn to and subscribed before me this 20th day of April, 1992.

Notary Public

CKM/NJS, mb

MY COMMISSION EXPIRES JAN. 2, 1994

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Enclosures:

1. Basis for Proposed Change
2. 10 CFR 50.92 Evaluation
3. Instructions for Incorporation

xc: Georgia Power Company  
Mr. W. B. Shipman  
Mr. M. Sheibani  
NORMS

U. S. Nuclear Regulatory Commission  
Mr. S. D. Ebnetter, Regional Administrator  
Mr. D. S. Hood, Licensing Project Manager, NRR  
Mr. B. R. Bonser, Senior Resident Inspector, Vogtle

State of Georgia  
Mr. J. D. Tanner, Commissioner, Department of Natural Resources

## ENCLOSURE 1

### VOGTLE ELECTRIC GENERATING PLANT REQUEST TO REVISE TECHNICAL SPECIFICATION 4.3.4.2.d TURBINE OVERSPEED PROTECTION SYSTEM

#### BASIS FOR PROPOSED CHANGE

##### Proposed Change

Existing surveillance requirement 4.3.4.2.d requires at least one each of the four high-pressure turbine stop valves, four high-pressure turbine control valves, six low-pressure turbine intermediate stop valves, and six low-pressure turbine intercept valves to be disassembled and inspected at least once per 40 months. The proposed change would revise this requirement so that all of these valves are disassembled and inspected at least once per 60 months.

##### Basis

Vogtle Electric Generating Plant is equipped with General Electric turbine-generators. Steam from each of the four steam generators enters the high-pressure turbine through four 28-inch stop valves and governing control valves; one stop valve and one control valve form a single assembly. After expanding through the high-pressure turbine, the steam is reheated to superheat conditions. After reheating, the steam flows through the 34-inch combined intermediate stop and intercept valves in each of the six steam lines leading to the inlets of the three low-pressure turbines. Similar to the main stop and control valves, the intermediate stop and intercept valves form six single assemblies. Valve opening actuation is provided by a 1600-psig hydraulic system; valve closing actuation is provided by springs and steam forces upon the reduction or relief of fluid pressure. Actuation of the emergency trip system will release the hydraulic fluid pressure in the valve actuators, allowing springs to close the valves.

Under the existing surveillance requirement, assuming an 18-month fuel cycle, one each of the stop valves, control valves, and the intermediate stop and intercept valves are disassembled and inspected during every other refueling outage. Under the proposed surveillance requirement, all four stop valves would be disassembled and inspected during one outage, the four control valves during the next outage and the intermediate stop and intercept valves during the next outage. While the stop and control valves in a steam line are considered to form a single assembly, they can be disassembled separately. However, the intermediate stop and intercept valves are integral units which must be disassembled and inspected at one time. Therefore, under the proposed change, all of the subject valves would be disassembled and inspected at least once per 60 months (recognizing potential variations in fuel cycle length, but not to result in the surveillance interval exceeding the 25-percent extension allowed by TS 4.0.2).

Under the existing surveillance requirement, all of the subject valves would be inspected after approximately 12 fuel cycles. Under the proposed requirement,

ENCLOSURE 1 (CONTINUED)

REQUEST TO REVISE TECHNICAL SPECIFICATION 4.3.4.2.d  
TURBINE OVERSPEED PROTECTION SYSTEM

BASIS FOR PROPOSED CHANGE

all of the valves would be inspected every three fuel cycles. The net effect is that the valves are inspected more frequently. In addition, it is advantageous to inspect all of the valves of a given type during one outage, rather than one of each. From the standpoint of training maintenance personnel, obtaining spare parts and supplies, and the experience gained by inspecting all valves of each type at one time, the proposed requirement is preferable to the existing one. A problem generic to a given type of valve can be corrected at one time. The effect of more frequent inspections plus inspecting all valves of a given type at the same time should result in increased reliability of the turbine overspeed protection system.



## ENCLOSURE 2

### VOGTLE ELECTRIC GENERATING PLANT REQUEST TO REVISE TECHNICAL SPECIFICATION 4.3.4.2.d TURBINE OVERSPEED PROTECTION SYSTEM

#### 10 CFR 50.92 EVALUATION

Pursuant to 10 CFR 50.92, GPC has evaluated the proposed amendment and has determined that operation of the facility in accordance with the proposed amendment would not involve a significant hazards consideration. The basis for this determination is as follows:

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated. The vendor has confirmed that the proposed inspection frequency has no effect on the turbine-generator missile analysis, since the analysis does not have a component which includes valve inspection frequency. The 60-month inspection interval is consistent with the vendor's recommendations for valves in this type of service. The net effect of the proposed change will be more frequent inspections for each valve. This should have a positive effect on the reliability of these valves.
2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed amendment does not involve any changes in design or operating parameters for these valves. They will continue to perform their function as intended and as assumed in the accident analyses. The proposed amendment only affects the frequency at which these valves will be disassembled and inspected, the net effect of which should be improved reliability.
3. The proposed amendment does not involve a significant reduction in a margin of safety. As stated above, the vendor has confirmed that the proposed amendment has no effect on the turbine-generator missile analysis. Furthermore, with an increased inspection frequency, the valves should be able to perform their intended function with increased reliability.

#### Conclusion

Based on the preceding analysis, GPC has determined that the proposed amendment to the TS will not significantly increase the probability or consequences of an accident previously evaluated, create the possibility of a new or different kind of accident previously evaluated, or involve a significant reduction in a margin of safety. Georgia Power Company therefore concludes that the proposed amendment meets the requirements of 10 CFR 50.92(c) and does not involve a significant hazards consideration.

ENCLOSURE 3

VOGTLE ELECTRIC GENERATING PLANT  
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