Georgia Power Company
333 Piedmont Avenue
Atlanta, Georgia 30308
Telephone 404 526-6724

Mailing Address:
Post Office Box 4545
Atlanta, Georgia 30302

R. E. Conway
Senior Vice President

the southern electric system

NED-84-465

August 27, 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 DOCKET 50-366
OPERATING LICENSE NPF-5
EDWIN I. HATCH NUCLEAR PLANT UNIT 2
REQUEST FOR TECHNICAL SPECIFICATION RELIEF

Gentlemen:

In accordance with the provisions of 10 CFR 50.90 as required by 10 CFR 50.59(c)(1), Georgia Power Company hereby proposes a change to the Technical Specifications, Appendix A to Operating License NPF-5. The proposed change, which is being requested on an emergency basis, will upgrade Table 3.8.2.6-1, Primary Containment Penetration Conductor Overcurrent Protective Devices, to reflect different current requirements for four motors which were replaced in the current refueling/modification outage.

Table 3.8.2.6-1 lists trip setpoints (in amperes) for circuit breakers which provide overcurrent protection for electrical penetrations into the primary containment. These trip setpoints are designed to protect both the electrical equipment inside the containment and the containment penetration itself from overcurrent damage. Technical Specification 3.8.2.6 requires that the associated equipment be de-energized if the trip setpoints listed in the table cannot be met. The values listed in the table correspond to the current at which damage to the electrical equipment could occur, which is generally much lower than the current at which damage to the penetration itself could occur. The requested change involves four penetrations, as detailed on the attached Technical Specifications pages. In each case the electrical equipment associated with the penetration was replaced in order to meet the requirements of I&E Bulletin 79-01B, Environmental Qualification of Electrical Equipment. For two penetrations, the new equipment resulted in increased current values. These are penetrations serving the HPCI steam line inboard isolation valve motor (current increased from 30 to 35 amps) and the main steam line drain valve motor (current increased from 7 to 19 amps). Two penetrations now have reduced current values as a result of the I&E Bulletin 79-01B modifications. These are penetrations serving the "A" and "B" recirculation loop pump discharge valve motors (215 amps and 185 amps, respectively, to 135 amps each).

Rec'd w/check #967910
for $150.00

A048
1/1

These four penetrations are designed for a maximum current of 3300 amperes. This value is greatly in excess of any of the new current values requested above. The requested changes, while necessary (by Technical Specification 3.8.2.6) to provide operability of the associated electrical equipment, will thus have a negligible effect on the ability of the penetrations to survive an electrical fault.

The Plant Review Board has reviewed the proposed change and determined that it does not constitute an unreviewed safety question. Accident probabilities and consequences are not increased above those analyzed in the FSAR. The function of the circuit breakers is not affected by a change in setpoints. As detailed above, the circuit breaker's ability to provide the required electrical fault protection to the penetration is not adversely affected. No new accident types are created since no new modes of operation are involved. The effect on the margin of safety as defined in the Technical Specifications is negigible, since the change in current value requested represents an insignificant fraction of the penetration's current rating.

This change is being requested on an emergency basis. While unit startup can be effected by de-energizing the equipment associated with these penetrations, this course of action is not desirable for several reasons. By de-energizing the main steam line drain valve motor, the ability to equalize around the MSIVs following a reactor isolation is lost. Thus, should a reactor isolation occur while operating in this mode, actuation of the safety/relief valves would be required because the condenser could not be re-established as a heat sink. This represents an undesirable challenge to an important safety system as well as a substantial thermal cycle to the reactor and associated equipment.

We request this change on an expeditious basis. The Plant Review Board has concluded, based on 10 CFR 50.59, that plant startup is acceptable if the equipment associated with these penetrations is de-energized, or left at the existing Technical Specification value. The breakers can be adjusted on-line following approval of this change for the HPCI isolation valve and the main steam line drain. The recirculation pump discharge valve motor breakers would be adjusted following the next unit shutdown, and we request that that portion of the change be effective at that time.

Attached along with the proposed changes is a determination of no significant hazards and payment of filing fee.

Georgia Power

Please contact this office for further discussion if necessary.

Pursuant to the requirements of 10 CFR 50.91, Mr. J. L. Ledbetter of the Environmental Protection Division of the Georgia Department of Natural Resources will be sent a copy of this letter and all applicable attachments.

R. E. Conway states that he is Senior 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: R. E. Conway
R. E. Conway

Sworn to and subscribed before me this 27th day of August, 1984.

Notary Public

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

REB/

Enclosure

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