

Georgia Power Company
333 Piedmont Avenue
Atlanta, Georgia 30308
Telephone 404 526-6526

Mailing Address:
Post Office Box 4545
Atlanta, Georgia 30302

L. T. Guwra
Manager Nuclear Engineering
and Chief Nuclear Engineer



Georgia Power

the southern electric system

NED-84-444

September 4, 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
SCHEDULER EXEMPTIONS FOR NON-OUTAGE-RELATED
APPENDIX R MODIFICATIONS

Gentlemen:

By letter dated May 25, 1984, Georgia Power Company (GPC) resubmitted a request for scheduler exemption for implementation of Appendix R modifications. In that letter we proposed to meet on a fire area-by-fire area basis either items 1 or 2, and item 3 as identified in your "Guidance on Interim Measures to Support Scheduler Exemption Requests" for the period of time from expiration of the 10 CFR 50.48 schedule allowance until the specific fire area is in compliance with paragraphs III.G.2 and III.G.3 of Appendix R as modified by the exemptions granted by NRC's letter of April 18, 1984. While your letter of June 8, 1984 indicated that the aforementioned GPC letter lacked the specificity needed to grant our scheduler exemption request, you indicated that the proposed schedules appeared acceptable provided GPC and NRC could reach agreement on compensatory measures to be implemented until such time as the permanent modifications were implemented.

GPC wishes to advise NRC that scheduler exemptions are still required and herein proposes specific compensatory measures to support the requested relief. Enclosure 1 to this letter addresses compensatory measures for those Plant Hatch modifications which can be accomplished during a non-outage period but which cannot be completed in the time frame allowed by 10 CFR 50.48. The compensatory measures for the aforementioned modifications were developed based upon the additional "Guidance on Interim Measures to Support Scheduler Exemption Requests" provided by the NRC Licensing Project Manager.

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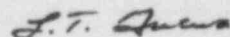
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The compensatory measures for each modification discussed in Enclosure 1 will be implemented contingent upon NRC approval. Tentative plans are to implement the compensatory measures for the non-outage-related modifications prior to Hatch Unit 1 restart from the Fall 1984 maintenance/refueling outage scheduled to begin on or about October 1, 1984. The compensatory measures for Hatch Unit 2 and those areas common to both units will be scheduled to be installed by October 15, 1984 or thirty (30) days after NRC approval, whichever is later.

With the submittal of this specific information concerning compensatory measures for those non-outage-related Appendix R modifications that cannot be completed in the time frame allowed by 10 CFR 50.48, GPC requests that our proposed scheduler exemption be granted by NRC. The staffs of GPC and its consultants are available for additional discussion of these interim compensatory measures should the NRC so desire.

Should you have any questions in this regard, please contact this office.

Sincerely yours,



L. T. Gucwa

JAE/RLK/mb

Enclosure

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

Enclosure 1

The following is a discussion of the Appendix R-related modifications identified in the "Edwin I. Hatch Nuclear Plant Response to 10 CFR 50.48 and Appendix R" which can be implemented during a non-outage period but which as part of the total integrated Appendix R modification schedule can not be completed in the time frame allowed by 10 CFR 50.48. The non-outage modifications are those which do not fit the acceptable criteria for the classification of work as outage-related. The criteria for outage-related work are: (a) work which requires disabling a safety system, (b) work in an area in which radiation would result in unacceptable exposures to personnel during power operation, (c) work whose reasonable sequence requires that the work follow an outage-related job, or (d) work which could impact safety systems indirectly including tie-ins to fire mains which cannot be isolated without undesirable effects on overall plant fire protection.

These modifications are grouped by fire areas as identified in our July 1, 1982 submittal and subsequent amendments. For clarity, other modifications identified in that submittal which have been determined to require a plant outage to complete are not listed in this enclosure. The discussion contains a listing of the modifications in each area, the presently scheduled completion date, and the compensatory measures proposed for the interim time period. It is our belief that the measures proposed herein comply with the guidelines for interim compensation provided by the NRC.

4.1.1 4160-V Transformer Room - Unit 1

Non-Outage Modification / Implementation Schedule

- o Wrap conduit ESS-II-477 with 1-h barrier - June 1986

Compensatory Measure

- o Conduit ESS-II-477 will be wrapped within this area with Kaowool to provide a temporary fire barrier.

4.1.2 West 600-V Switchgear Room - Unit 1

Non-Outage Modifications / Implementation Schedules

- o Wrap conduit ESS-II-477 with 1-h barrier - June 1986
- o Upgrade west wall to 3-h barrier - April 1985

Compensatory Measures

- o Conduit ESS-II-477 will be wrapped within this area with Kaowool to provide a temporary fire barrier.
- o The existing two hour wall serves as an interim fire barrier along with a full automatic suppression system which exists on the opposite side of the wall and provides additional protection.

4.1.4 Control Building Working Floor el 112 ft - Unit 1

Non-Outage Modification / Implementation Schedule

- o Wrap raceway R25-S037-ES4-M14 with 3-h barrier - June 1986

Compensatory Measure

- o Raceway R25-S037-ES4-M14 will be wrapped within this area with Kaowool to provide a temporary fire barrier.

4.1.5 Reactor Building North of Column Line R7 - Unit 1

Non-Outage Modifications / Implementation Schedules

- o Install detection on 158 ft elevation and additional detectors associated with the water curtain on the 130 ft elevation - February 1986
- o Wrap safe shutdown-related cables in 20 ft sprinkler zone along R7 on elevations 130 ft and 158 ft - February 1986

Compensatory Measures

- o While these modifications in the reactor building do not specifically meet the criteria for outage-related work, they do involve work in a radiation field and in proximity to safety-related equipment. Their treatment herein as non-outage-related work for purposes of establishing 10 CFR 50.48 scheduler definition may in fact be overly conservative. However, the work (along with certain aspects of the outage-related work) must proceed during non-outage periods in order to meet our proposed schedule and we, therefore, propose the following:

The 130 ft elevation presently has a detection system for area-wide coverage. The additional detection and cable wrap are being added together with a sprinkler system to act as a water curtain to divide the reactor building into two fire areas. Fire loadings are low to moderate in the area (see the July 1, 1982 submittal for specific loadings) with limited intervening combustibles. Both elevations 130 ft and 158 ft are toured regularly by plant equipment operators (PEOs) and security personnel who would be instructed to observe the area for the accumulation of transient combustibles or fire conditions. The radiation levels in both areas make the use of a continuous fire watch undesirable due to ALARA considerations. The placement of a continuous fire watch in these areas would result in an additional unnecessary exposure of approximately 17.5 man-Rem per area per year. Therefore, the PEOs and security personnel will serve the function of a roving fire watch in these areas to supplement the area-wide automatic detection system already installed on the 130 ft level.

Compensatory Measures (Continued)

It should be noted that the offsite power sources at Plant Hatch are highly reliable and diverse such that the normal systems used by the operator for plant shutdown which are powered from offsite power should be available to the operator following a fire in the reactor building. With normal systems and procedures available, the operator has much greater flexibility in safely shutting down the reactor than that assumed in the Appendix R analysis. The majority of the reactor building areas are large open areas with high ceilings. Thus, the possibility in the interim period of a fire large enough to damage sufficient equipment in both shutdown pathways and systems powered from offsite power to prevent reaching cold shutdown is very small.

4.1.6 Reactor Building South of Column Line R7 - Unit 1

Non-Outage Modifications / Implementation Schedules

- o Wrap conduit ESS-II-3645 with 1-h barrier - February 1986
- o Wrap conduit ESS-II-3648 with 1-h barrier - February 1986
- o Wrap conduit ESS-I-3838 with 1-h barrier - February 1986

Compensatory Measures

- o Conduits ESS-II-3645, ESS-II-3648, and ESS-I-3838 will be wrapped within this area with Kaowool to provide a temporary fire barrier.

4.1.7 West DC Switchgear Room - Unit 1

Non-Outage Modification / Implementation Schedule

- o Upgrade wall between switchgear room and oil conditioner room to 3-h barrier - July 1985

Compensatory Measures

- o The existing two hour wall serves as an interim fire barrier. Also, a full automatic suppression system exists on the opposite side of the wall providing additional protection.

4.2.2 Control Building Health Physics Area - Unit 2

Non-Outage Modification / Implementation Schedule

- o Extension of sprinkler systems to cover trays 2CQA801, 2CRA801, and 2CUA701 - November 1985

Compensatory Measures

- o The cable trays of concern are in the ceiling above the health physics area and are separated by approximately 40 ft with minimal intervening combustibles. The ceiling tiles will be

Compensatory Measures (Continued)

removed from the areas of concern to facilitate detection of any fire condition by the health physics personnel. The health physics area is normally occupied and manual fire fighting equipment is available.

4.2.4 Control Building Oil Conditioner Room - Unit 2

Non-Outage Modifications / Implementation Schedules

- o Wrap raceway 2E22063 with 1-h barrier - April 1986
- o Wrap raceway 2E22064 with 1-h barrier - April 1986
- o Upgrade wall to 3-h fire rating - April 1985

Compensatory Measures

- o The wall is presently 2-h rated and the room has a full automatic suppression system.

4.2.6 Reactor Building North of Column Line R19 - Unit 2

Non-Outage Modifications / Implementation Schedules

- o Install sprinkler system on elevation 158 ft - July 1985
- o Install detection system on elevation 158 ft - December 1985

Compensatory Measures

- o While these modifications in the reactor building do not specifically meet the criteria for outage-related work, they do involve work in a radiation field and in proximity to safety-related equipment. Their treatment herein as non-outage-related work for purposes of establishing 10 CFR 50.48 scheduler definition may in fact be overly conservative. However, the work (along with certain aspects of the outage-related work) must proceed during non-outage periods in order to meet our proposed schedule and we, therefore, propose the following:

The sprinkler and detection systems to be installed are part of the water curtain to be used to divide the reactor building into two fire areas. The combustible loading in the 158 ft elevation area is low (34,367 Btu/ft²) with path 1 and 2 components separated by approximately 50 ft of open area with minimal intervening combustibles. The area is regularly toured by PEOs and security personnel who would be instructed to observe the area for a fire condition or accumulation of combustibles which could lead to a fire. The radiation level in the area makes the use of a continuous fire watch undesirable due to ALARA considerations. The placement of a continuous fire watch in these areas would result in approximately 17.5 man-Rem per area per year. Therefore, the PEOs and security personnel will serve the function of roving

Compensatory Measures (Continued)

fire watch in these areas. It should be noted that the offsite power sources at Plant Hatch are highly reliable and diverse such that the normal systems used by the operator for plant shutdown which are powered from offsite power should be available to the operator following a fire in the reactor building. With normal systems and procedures available, the operator has much greater flexibility in safely shutting down the reactor than that assumed in the Appendix R analysis. The majority of the reactor building areas are large open areas with high ceilings. Thus, the possibility in the interim period of a fire large enough to damage sufficient equipment in both shutdown pathways and systems powered from offsite power to prevent reaching cold shutdown is very small.

4.2.9 Turbine Building East Cableway - Unit 2

Non-Outage Modifications / Implementation Schedules

- o Wrap the following conduits with 1-h barrier - November 1985:
2CKA701, 2CIA701, 2CMA701, 2E12076, 2E12082, 2E12084, 2E12085,
2E22824, 2MR2543, 2MR2544, and 2CDA801

Compensatory Measures

- o The Unit 2 Turbine Building east cableway presently has an automatic suppression system installed.

4.2.10 Diesel Building Switchgear Room 2G - Unit 2

Non-Outage Modifications / Implementation Schedules

- o Wrap raceway 2ESB170 with 1-h barrier - July 1986
- o Wrap raceway 2ESB168 with 1-h barrier - July 1986
- o Wrap raceway 2ESB167 with 1-h barrier - July 1986

Compensatory Measures

- o Raceways 2ESB167, 2ESB168, and 2ESB170 will be wrapped within this area with Kaowool to provide a temporary fire barrier.

4.3.2 Control Building Corridor - Common

Non-Outage Modifications / Implementation Schedules

- o Wrap the following raceways with 1-h barrier - June 1986:

	<u>Unit 1</u>		<u>Unit 2</u>
TM08-01	TEJ8-02	TEA8-03	2CFA801
TEA8-04	TEJ8-01	TEH8-03	2CZA801
TML8-01	TEB8-02	TEH8-01	2CZB801
TEB8-03	TEB8-04	TEH8-02	
ESS II-477		TEB8-01	

Non-Outage Modifications / Implementation Schedule (Continued)

- o Extend sprinkler system to provide full coverage - November 1985

Compensatory Measures

- o The control building common corridor presently contains a partial sprinkler system and some raceways wrapped with Kaowool as part of the Appendix A modifications. Further, there is area-wide detection system installed. The corridor is a high traffic area providing access between units and is often occupied by health physics personnel at radiological check points; the potential for an undetected fire is relatively low.

4.3.3 RPS and Vertical Cable Chase Rooms - Common

Non-Outage Modifications / Implementation Schedules

- o Wrap raceway ESS-I-499 with 1-h barrier - June 1986
- o Install 3-h fire-rated doors to separate RPS rooms from cable chase - November 1984

Compensatory Measures

- o Raceway ESS-I-499 will be wrapped within this area with Kaowool as a temporary fire barrier. The vertical cable chase has an automatic suppression system installed.