



Georgia Power

the southern electric system

C. K. McCoy
Vice President, Nuclear
Vogtle Project

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LCV-0603-E

Docket Nos. 50-424
50-425

TAC Nos. M92131
M92132

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

Gentlemen:

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 (TS). The proposed changes would, in part, convert the existing VEGP TS to the improved TS for Westinghouse plants as represented by NUREG-1431. By letter dated December 21, 1995, (LCV-0603-D) GPC revised our May 1, 1995, submittal in response to requests for additional information from the NRC staff as well other issues that were identified subsequent to our May 1, 1995, submittal. Subsequent to our December 21, 1995, submittal, several additional issues have been identified that need to be addressed as described in the following paragraphs.

The following two changes to our proposed conversion to the improved TS are being submitted in response to NRC staff comments. The first revises Condition G of LCO 3.4.15, RCS Leakage Detection Instrumentation, and associated Bases, to clarify that, in the event that all required leakage detection systems are inoperable, LCO 3.0.3 should be entered immediately. The second change revises SR 3.8.1.13, and associated Bases, to specify a kVAR value (corresponding to a power factor of 0.9) for the period of time that the diesel generator is loaded to between 7600 kW and 7700 kW.

The following three changes are necessary to correct errors in our submittal. The Bases for LCO 3.2.1 Required Action A.3 state that the Overpower ΔT trip setpoint (value of K_d) must be reduced by $\geq 1\%$ (in ΔT span) for each 1% by which $F_Q(Z)$ exceeds its limit. However,

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in LCO 3.3.1, the Overpower ΔT trip setpoint equation was revised such that it is expressed in terms of percent Rated Thermal Power (RTP) rather than in ΔT span. Therefore, the Bases for LCO 3.2.1 Required Action A.3 should be revised to state that the Overpower ΔT trip setpoint must be reduced by $\geq 1\%$ (*in % RTP*) to correspond with the expression of the Overpower ΔT trip setpoint in % RTP in LCO 3.3.1.

The next correction needed concerns a statement in Enclosures 1 and 2 to Chapter 3.8 (Discussion of Change 67) that the current requirement 4.8.1.1.2.j.2 regarding the pressure test of the ASME Code III diesel fuel oil system would be relocated to inservice inspection and testing programs. ASME Section XI does not address diesel fuel oil systems. Therefore, this requirement is more appropriately controlled by plant maintenance procedures.

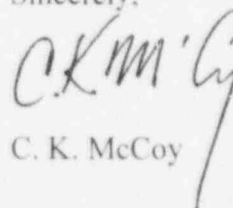
Another needed correction which is similar to the above is that the Bases for Surveillance Requirement 3.8.3.7 states that this SR requires ASME Section XI examination of the diesel fuel oil storage tanks. A change to the Bases for Surveillance Requirement 3.8.3.7 is enclosed to remove the reference to ASME Section XI.

Another change that needs to be made affects the Bases for LCO 3.7.6 which contains requirements for the condensate storage tanks (CSTs). The Bases presently state that a design modification is planned for the CSTs during 1996. That design modification is being rescheduled, and a revised Bases page is enclosed to reflect the change in plans. As stated in the improved TS, both CSTs will be required to be operable in accordance with LCO 3.7.6a after improved TS implementation and until implementation of the design modification.

Finally, a change is proposed to items 5.5.11.a and 5.5.11.c of section 5.0 to maintain current licensing basis. Specifically, the requirement of 5.5.11.a that penetration and system bypass be verified $< 0.05\%$ would be revised to $\leq 0.05\%$. The current TS acceptance criteria (TS 4.7.6.c.1 and 4.7.7.b.1) is expressed in terms of a filter retention of greater than *or equal to* 99.95%. Therefore the proposed change is consistent with current TS requirements when expressed in terms of penetration and system bypass. Similarly, the requirement of 5.5.11.c that methyl iodide penetration be verified "less than" a limiting value is revised to "less than or equal to." This is consistent with current TS requirements 4.7.6.c.2 and 4.7.7.c.

All of the above changes are consistent with the justifications and significant hazards evaluations provided with our letter dated May 1, 1995, as revised by our letter dated December 21, 1995.

Sincerely,



C. K. McCoy

U. S. Nuclear Regulatory Commission
LCV-0603-E
Page 3

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Enclosures

xc: Georgia Power Company
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U. S. Nuclear Regulatory Commission
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