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NED-84-421

September 6, 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 50-321 OPERATING LICENSE DPR-57 EDWIN I. HATCH NUCLEAR PLANT UNIT 1 <u>PEVISION TO PROPOSED APRM/RBM</u> TECHNICAL SPECIFICATIONS

Gentlemen:

By letter dated February 6, 1984 (NED-34-030), Georgia Power Company (GPC) submitted a request for amendment to the Edwin I. Hatch Units 1 and 2 Technical Specifications (Appendix A to the Operating Licenses). Based on discussions with the NRC staff concerning that proposal, GPC submits the following revisions to the requested Technical Specifications changes for Unit 1. These revisions would: 1) provide an additional restriction on plant operation during the Limiting Condition for Operation with one recirculation loop out of service; 2) remove the one hour time period allowed prior to blockage of control rod withdrawal with the plant in a Limiting Control Rod Pattern and both Rod Block Monitor (RBM) channels inoperable; and 3) correct a typographical error in that earlier submittal.

This submittal includes a revision which would require that the plant be operated below the limit shown in Technical Specifications Figure 3.6-5 (which corresponds to a load line leading to 80% reactor power at rated core flow) within 2 hours after the loss of service of one recirculation loop. The NRC staff has previously requested a similar change to the Unit 2 Technical Specifications in conjunction with the Unit 2 ARTS/ELLLA submittal. That requested change was submitted by our July 12, 1984 letter (NED-84-375).

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Following discussions with the NRC staff, GPC proposed a one hour time limit for blocking of control rod withdrawals when both RBM channels were inoperable. However, we have concluded that the proposed change, which was intended to eliminate a problem with the vaguely worded existing specification, was inconsistent with our intent, which was to block further control rod withdrawal following discovery that both RBM channels were inoperable. The attached proposed wording which requires the blocking of further control rod withdrawals on discovery of inoperability of both RBM channels is more consistent with the intent of the specification.

Since our February 6, 1984 submittal, GPC has discovered that a symbol was ommitted from proposed Technical Specifications page 3.2-16a. The revisions enclosed with this letter include a correction of that error.

Both the Plant Review Board and the Safety Review Board have reviewed the proposed changes and have determined that they do not involve an unreviewed safety question. The probability of occurrence and the consequences of an accident or malfunction of equipment important to safety would not be increased above those analyzed in the FSAR due to these proposed change because the affected systems will still be restricted to operational conditions bounded by those described in the FSAR. The possibility of an accident or malfunction of a different type than analyzed in the FSAR would not result from these proposed change because no new operational or transient modes would be allowed by the new requirements. The margin of safety as defined in the Technical Specifications would not be reduced due to the proposed changes because they would result in a more conservative restriction on allowed operational conditions.

Instructions for incorporation of these proposed changes as well as revised Technical Specifications pages are enclosed (Attachment 1).

As required by 10 CFR 50.92, a significant hazards review for these proposed changes is enclosed (Attachment 2). GPC has determined that implementation of these revisions would not involve a significant hazards consideration.

Rursuant 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.

Sincerely yours,

J.T. Quen

L. T. Gicwa

Georgia Power

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Enclosure

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