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Georgia Power

the southern electric system

NED-84-479

September 10, 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
EXTENSION TO INSTALLATION SCHEDULE
FOR MARK I CONTAINMENT LONG-TERM PROGRAM

Gentlemen:

The Nuclear Regulatory Commission issued an order dated January 19, 1982, for Plant Hatch Units 1 and 2 which modified a 1981 order by extending the completion dates for the installation of plant modifications needed for compliance with the NRC staff's acceptance criteria for the Mark I Containment Long-Term Program (LTP). The completion date for Unit 1 ordered therein was "...no later than prior to the start of Cycle 7 for Hatch Unit 1...".

The elements of Plant Hatch's extensive LTP, including the Plant Unique Analysis Report, have been completed with the exception of the modifications to the Torus Attached Piping (TAP) on Unit 1. The Unit 1 refueling outage prior to Cycle 7 is scheduled to begin on or about September 29, 1984. The remaining TAP modifications have been scheduled for implementation during this upcoming outage. However, the large amount of work related to safety and compliance with regulations which is scheduled to be performed within the drywell during this outage period makes the implementation of modifications to some 57 safety/relief valve tailpipe supports located within the drywell impractical within the limits of available time and personnel resources. We, therefore, request a modification to your January 13, 1981 order to allow an extension until the start of cycle 8 for the implementation of that portion of the TAP modifications which are located within the drywell. Those portions of TAP located outside the drywell will be modified during the upcoming outage in accordance with the existing schedule.

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The maintenance and modification work scheduled for the upcoming Unit 1 outage, which follows closely the arduous seven-month Unit 2 recirculation pipe replacement outage, presents an undue demand on the available personnel resources. In order to maintain the level of control and coordination necessary to assure plant and personnel safety, the implementation of some work needs to be rescheduled to future outages. In the specific case of the TAP modifications on safety relief valve piping supports, there is other more pressing work (e.g. equipment qualification, recirculation pipe inspection and potential repair) to be accomplished within the very restricted workspace of the drywell. Further, the ability to properly supervise the implementation of outage activities is limited by the number of available qualified personnel. We, therefore, propose that the TAP modifications within the drywell be performed during the next refueling outage which precedes Unit 1's cycle 8.

As part of the Mark I Containment Short-Term Program (STP), the NRC staff determined that a margin of safety of at least two was available in the containment design. This margin was sufficient to assure the containment function in the event of a design basis loss of coolant accident. Therefore, an adequate basis for continued plant operation exists through completion of the LTP. The majority of the LTP which has already been completed on Unit 1 has provided a very significant improvement in the containment's safety margin. The originally intended margins of safety in the containment design will have been largely restored by the improvements already accomplished under the LTP and the TAP work outside the drywell which is to be accomplished during the upcoming outage. Therefore, the requested extension can be granted without significant impact to the public health and safety.

Your earliest attention to this request is solicited so that final planning for the upcoming Unit 1 outage can proceed. If you have questions regarding this request, please contact this office.

Yours very truly,



L. T. Gucwa

WEB/mb

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