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Georgia Power

the southern electric system

NED-84-491

September 11, 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
EQUIPMENT QUALIFICATION PROGRAM
DEADLINE EXTENSION REQUEST

Gentlemen:

Paragraph (g) of 10 CFR 50.49 requires that environmental qualification of electrical equipment defined by paragraph (b) of that regulation, be completed by the end of the second refueling outage after March 31, 1982 or by March 31, 1985, whichever is earlier. The above-described outage for Plant Hatch Unit 1 is currently scheduled to begin by October 1, 1984 and last between eight and ten weeks. Georgia Power Company (GPC) has determined that the large scale modification and/or replacement of equipment needed to fully meet 10 CFR 50.49 will not be fully completed at the end of that upcoming outage; therefore a request for extension of the qualification deadline is necessitated.

GPC has embarked on an ambitious and extensive program in an attempt to meet all of the stated and implied requirements of the equipment qualification rule. In many cases GPC has pursued replacement of equipment rather than relying on marginally-acceptable engineering analyses to prove that necessary equipment would perform its intended function during an accident. This effort has been both expensive and time-consuming, and has placed a heavy burden on the skilled manpower available at Plant Hatch, due to the large number of equipment items which are being replaced. The manhours which will be required to complete the Hatch-1 program will not be available during the upcoming outage as scheduled, due to its short length and also due to work which must be completed to meet other regulations and commitments. Since the vast majority of the equipment qualification work involves removing critical systems from service, it can only be completed while the plant is shut down.

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GPC has just completed a 235 day outage on Hatch-2, which in addition to refueling, included replacement of the recirculation system piping and extensive equipment modifications and replacement for the equipment qualification program. Experience gained during that outage leads GPC to conclude that such a massive amount of work can only be performed under conditions which foster high levels of activity control and coordination if personnel and plant safety are to be assured. The plant maintenance and modification activities scheduled for the upcoming Unit 1 outage, which follows closely the long and arduous Unit 2 outage, present undue demands on personnel resources. GPC has thus determined that overall plant safety would be enhanced by the rescheduling of a number of planned modifications until a later outage.

GPC has previously requested qualification deadline extensions for certain Hatch 1 equipment items by letters dated July 6, 17, and 19, 1984 (NED-84-369, 383, and 391, respectively). It has been determined that certain additional items cannot be qualified prior to the end of the upcoming outage. Therefore, GPC requests that a qualification deadline extension to November 30, 1985 be granted, under the provisions of 10 CFR 50.49(g), for the existing Hatch 1 equipment items listed in the enclosure to this letter.

The extensive equipment replacement effort which GPC has undertaken has been fraught with the types of delays and other problems which plague the nuclear grade equipment procurement process. Many delays have resulted from qualification testing of both existing and new types of equipment, as vendors have attempted to develop methods for meeting the latest requirements. Testing of a few items is still not fully completed.

GPC believes that the additional confidence in the ability of plant systems to protect the public health and safety, which should result from the completion of the Hatch-1 qualification program, outweighs the problems which have occurred during implementation. We have determined that the delay in completion of the program will enhance overall plant safety by improving management control of outage activities. Furthermore, GPC has submitted Justifications for Continued Operation (JCOs), for all equipment items for which an extension is requested, by letter dated July 24, 1984 (NED-84-395).

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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. Guwa

L. T. Guwa

CBS/mb

Enclosure

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

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GPC requests that the 10 CFR 50.49(g) qualification deadline be extended to November 30, 1985, for the following equipment items:

<u>Plant MPL Number</u>	<u>Equipment Description</u>
B21-F019	Motorized Valve Operator
B31-F031A,B	Motorized Valve Operator
E11-F004D	Motorized Valve Operator
E11-F008	Motorized Valve Operator
E11-F009	Motorized Valve Operator
E11-F021A,B	Motorized Valve Operator
E11-F022	Motorized Valve Operator
E11-F028A,B	Motorized Valve Operator
E11-F075A	Motorized Valve Operator
E21-F004A,B	Motorized Valve Operator
E21-F005A,B	Motorized Valve Operator
E41-F001	Motorized Valve Operator
E41-F003	Motorized Valve Operator
E41-F006	Motorized Valve Operator
E41-F007	Motorized Valve Operator
E41-F011	Motorized Valve Operator
E41-F012	Motorized Valve Operator
E41-F041	Motorized Valve Operator
E41-N074	Limit Switch
E51-F008	Motorized Valve Operator
E51-F031	Motorized Valve Operator
G31-F001	Motorized Valve Operator
G31-F004	Motorized Valve Operator
P52-F875	Motorized Valve Operator
P52-N021	Pressure Switch

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<u>Plant MPL Number</u>	<u>Equipment Description</u>
T41-N019A,B	Temperature Switch
T41-N020A,B	Temperature Switch
T41-N021A,B	Temperature Switch
T46-N005B,C	Differential Pressure Transmitter
T47-N003	Temperature Element
T47-N009	Temperature Element
T48-F112A,B	Hydraulic Valve Operator
T48-K001	Power Supply
T48-K011A,B	Power Supply
T48-N001	Pressure Transmitter
T48-N009A,B,C,D	Temperature Element
T48-N014A,B	Flow Transmitter
T48-N021A,B	Differential Pressure Transmitter
T48-N210	Differential Pressure Switch
T48-N211	Differential Pressure Switch
H1-16	PVC Jacketed Cable
J2-03	PVC Jacketed Cable
J2-04	PVC Jacketed Cable
M5-20	PVC Jacketed Cable
N1-04	PVC Jacketed Cable
N3-03	PVC Jacketed Cable
N3-04	PVC Jacketed Cable

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