

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

Mailing Address:
Post Office Box 4545
Atlanta, Georgia 30302

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



Georgia Power

the southern electric system

NED-84-506

September 26, 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
RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION
ON 1984 REFUELING OUTAGE INSPECTION PROGRAM

Gentlemen:

Georgia Power Company (GPC) hereby provides the following information in response to the September 17, 1984 telecopy from the Plant Hatch NRC Licensing Project Manager, Mr. G. Rivenbark, requesting additional information concerning our May 31, 1984 submittal on the 1984 Plant Hatch Unit 1 refueling outage inspection plans for stainless steel piping. The four topics addressed in the telecopy were sampling plan, qualification of examination personnel, leak detection and leakage limits, and plans for other inspections in selected components as a result of IGSCC observed at other utilities.

SAMPLING

The number of welds scheduled to be examined by size and category as identified in NRC Generic Letter 84-11 are:

Welds Not Examined Previously

4" Recirc - None to be examined, 100% examined during previous outage
12" Recirc - 6 welds to be examined
22" Recirc - None to be examined, 100% examined during previous outage
28" Recirc - 6 welds to be examined
20" RHR - None to be examined, 100% examined during previous outage
24" RHR - None to be examined, 100% examined during previous outage
6" RWCU - 3 welds to be examined

Subtotal - 15 welds to be examined

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Welds Examined Previously

4" Recirc - 1 weld to be examined (bypass removed during 1977 refueling outage)
12" Recirc - 5 welds to be examined
22" Recirc - 3 welds to be examined (in addition, 5 more welds are to be examined due to weld overlay repairs or being left unrepaired - see below)
28" Recirc - 2 welds to be examined
20" RHR - 1 weld to be examined (in addition, 1 more weld to be examined due to weld overlay repair - see below)
24" RHR - 1 weld to be examined (in addition, 1 more weld to be examined due to weld overlay repairs - see below)
6" RWCU - 2 welds to be examined
Subtotal - 15 welds to be examined

Overlay Repaired Welds (Note: affected piping size only shown)

22" Recirc - 4 welds to be examined
20" RHR - 1 weld to be examined
24" RHR - 1 weld to be examined
Subtotal - 6 welds to be examined

Cracked, Unrepaired Welds (Note: affected piping size only shown)

22" Recirc - 1 weld to be examined
Subtotal - 1 weld to be examined

Total - 37 welds to be examined from above four categories

GPC has reviewed the requirements of NRC Generic Letter 84-11 and has determined that the scope of examination must be expanded to meet minimum requirements for 6" RWCU not examined previously and 4" Recirc examined previously. Consequently, four welds (vice three noted above) will be examined for 6" RWCU not examined previously and two welds (vice one noted above) will be examined for 4" Recirc examined previously in lieu of that shown above. Therefore, the grand total of examinations has increased to thirty-nine (39) welds requiring examination for the four categories specified in NRC Generic Letter 84-11.

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PLANS FOR OTHER INSPECTIONS

In addition to the above proposed sample, the following examinations will be performed as a result of recent cracking experienced at other BWR utilities:

- a) At least one recirculation outlet nozzle-to-safe end weld and two recirculation inlet nozzle-to-safe end welds will be examined during the upcoming Plant Hatch 1 outage. These inspections were committed previously by GPC to NRC through the GE BWR Owners Group response to NRC regarding cracking in Inconel-clad safe ends and nozzles;
- b) Fifty percent (50%) of the recirculation inlet nozzle thermal sleeve attachment welds will be examined during the upcoming outage. Should unacceptable indications be observed, the remaining 50% would then be examined, radiation levels permitting. The configuration of these welds at the Plant Hatch units differ significantly from those units observing cracking in this type weld in that the thermal sleeve does not weld to the nozzle safe end at either Plant Hatch unit. This was discussed in considerable detail with NRC Region II personnel during a telephone conversation on August 16, 1984; and
- c) Both "A" and "B" recirculation loop jet pump instrumentation nozzle safe end-to-penetration seal welds will be examined during the upcoming outage. The safe end-to-nozzle welds for these particular nozzles will not be examined since they were examined during the previous outage.

QUALIFICATION OF UT PERSONNEL

The information provided in our May 31, 1984 submittal was specific regarding qualification of UT personnel in that:

- a) It did indicate that procedures similar to those previously qualified at Battelle-Columbus (BCL) for IGSCC detection would be used. The latest approved revision of the procedure technically meets or exceeds the originally BCL-qualified procedure, e.g., calibration requirements, recording requirements, etc. Further, similar procedures, techniques, etc. have been reviewed and found acceptable for use through NRC Region II I&E inspections at Plant Hatch during inservice inspection activities; and

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- b) It did indicate that various Levels II and III inspection personnel who will perform data evaluation have been qualified in the detection of IGSCC through the process currently in effect at the EPRI NDE Center. NDE personnel under contract to our primary inservice inspection group, Southern Company Services, who have qualified at the EPRI NDE Center in the detection and interpretation of IGSCC may also perform examinations and evaluations, as appropriate. As is the case of the procedures, inspector qualification is subject to audit by NRC regional personnel and have met the necessary requirements to date.

With regard to qualification of personnel in sizing of IGSCC, NRC has not formally notified GPC through implementation letter, bulletin, etc. per the NRC's review and approval process that this is a requirement. In anticipation of any such future sizing qualification requirement, the primary inservice inspection group to be used at Plant Hatch has several Levels II and III personnel on its staff qualified through the EPRI NDE Center for the sizing of cracks. Those personnel and any subcontractor personnel similarly qualified can be used for sizing of IGSCC indication depth should reportable indications be observed.

LEAK DETECTION AND LEAKAGE LIMITS

Our May 31, 1984 submittal indicated that proposed Technical Specification changes to augment these existing reactor coolant leakage detection requirements were submitted to you by letters dated February 10 and 11, 1983. The proposed changes were subsequently reviewed and approved as discussed in the NRC's Plant Hatch Unit 1 Safety Evaluation Report dated February 11, 1983. The proposed changes meet the intent of the leak detection and leakage limits discussed in Attachment 1 of NRC Generic Letter 84-11. No changes other than those discussed in Section 2.5 of Attachment 1 to our May 31 submittal are planned.

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

Sincerely yours,

William E. Burns /for
L. T. Gucwa

JAE/mb

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