

ATTACHMENT 1
PROPOSED CHANGES TO THE
HATCH 1 AND 2
TECHNICAL SPECIFICATIONS

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NRC DOCKET 50-321
OPERATING LICENSE DPR-57
EDWIN I. HATCH NUCLEAR PLANT - UNIT 1
PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS

The proposed changes to the Technical Specifications (Appendix A to Operating License DPR-57) would be incorporated as follows:

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3.5.A.2. Operation with Inoperable Components

If one CS system loop is inoperable, the reactor may remain in operation for a period not to exceed seven (7) days providing all active components in the other CS system loop, the RHR system LPCI mode and the diesel generators (per Specification 4.9.A.2.a) are operable.

3. Shutdown Requirements

If Specification 3.5.A.1.a or 3.5.A.2 cannot be met the reactor shall be placed in the Cold Shutdown Condition within 24 hours.

B. Residual Heat Removal (RHR) System (LPCI and Containment Cooling Mode)1. Normal System Availability

a. The RHR System shall be operable:

- (1) Prior to reactor startup from a cold condition, or
- (2) When irradiated fuel is in the reactor vessel and the reactor pressure is greater than atmospheric except as stated in Specification 3.5.B.2.

4.5.A.2. Surveillance with Inoperable Components

When it is determined that one core spray loop is inoperable at a time when operability is required, the other core spray loop, and the RHR system LPCI mode shall be demonstrated to be operable immediately. The operable core spray loop shall be demonstrated to be operable daily until both loops are returned to normal operation.

B. Residual Heat Removal (RHR) System (LPCI and Containment Cooling Mode)1. Normal Operational Tests

RHR system testing shall be performed as follows:

<u>Item</u>	<u>Frequency</u>
a. Air test on drywell headers and nozzles and air or water test on torus headers and nozzles	Once/5 years

3.5.B.1 Normal System Availability (Cont.)

One RHR loop with two pumps or two loops with one pump per loop shall be operable in the shutdown cooling mode when irradiated fuel is in the reactor vessel and the reactor pressure is atmospheric except prior to a reactor startup as stated in Specification 3.5.B.1.a.

- c. The reactor shall not be started up with the RHR system supplying cooling to the fuel pool.
- d. During reactor power operation, the LPCI system discharge cross-tie valve, E11-F010, shall be in the closed position and the associated valve motor starter circuit breaker shall be locked in the off position. In addition, an annunciator which indicates that the cross-tie valve is not in the fully closed position shall be available in the control room.
- e. Both recirculation pump discharge valves shall be operable prior to reactor startup (or closed if permitted elsewhere in these specifications).

2. Operation with Inoperable Componentsa. One LPCI Pump Inoperable

If one LPCI pump is inoperable, the reactor may remain in operation for a period not to exceed seven (7) days provided that the remaining LPCI pumps, both LPCI subsystem flow paths, the Core Spray system, and the associated diesel generators (per Specification 4.9.A.2.a) are operable.

b. One LPCI Subsystem Inoperable

A LPCI subsystem is considered to be inoperable if (1) both of the LPCI pumps within that system are inoperable (2) the active valves in the subsystem flow path are inoperable.

4.5.B.1 Normal Operational Tests

<u>Item</u>	<u>Frequency</u>
b. Simulated Automatic Actuation Test	Once/Operating Cycle
c. System flow rate: Each RHR pump shall deliver at least 7700 gpm against a system head of at least 20 psig.	Once/3 months
d. Pump Operability	Once/month
e. Motor Operated valve operability	Once/month
f. Both recirculation pump discharge valves shall be tested for operability during any outage exceeding 48 hours, if operability tests have not been performed during the preceding month.	

2. Surveillance with Inoperable Componentsa. One LPCI Pump Inoperable

When one LPCI pump is inoperable the remaining LPCI pumps and associated flow paths, and the Core Spray system shall be demonstrated to be operable immediately and daily thereafter, until the inoperable LPCI pump is restored to normal service.

b. One LPCI Subsystem Inoperable

When one LPCI subsystem is inoperable, all active components of the remaining LPCI subsystem and the Core Spray system shall be demonstrated to be operable, immediately

LIMITING CONDITIONS FOR OPERATION

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3.5.B.2. Operation with Inoperable Components (Continued)

- b. If one LPCI subsystem is inoperable, the reactor may remain in operation for a period not to exceed seven (7) days provided that all active components of the remaining LPCI subsystem, the Core Spray system, and the associated diesel generators (per Specification 4.9.A.2.a) are operable.

4.5.B.2. Surveillance with Inoperable Components (Continued)

and daily thereafter, until the inoperable LPCI subsystem is restored to normal service.

3.5.C.3 Two Pumps Inoperable

If two RHR service water pumps are inoperable, the reactor may remain in operation for a period not to exceed seven (7) days provided all redundant active components in both of the RHR service water subsystems are operable.

4. Shutdown Requirements

If Specifications 3.5.C cannot be met, the reactor shall be placed in the Cold Shutdown Condition within 24 hours.

D. High Pressure Coolant Injection (HPCI) System

1. Normal System Availability

- a. The HPCI System shall be operable:
 - (1) Prior to reactor startup from a cold condition, or
 - (2) when irradiated fuel is in the reactor vessel and the reactor pressure is greater than 113 psig, except as stated in Specification 3.5.D.2.

4.5.C.3. Two Pumps Inoperable

When two RHR service water pumps are inoperable, the remaining operable RHR service water subsystems shall be demonstrated to be operable immediately and daily thereafter for seven (7) days or until the inoperable components are returned to normal operation.

D. High Pressure Coolant Injection (HPCI) System

1. Normal Operational Tests

HPCI system testing shall be performed as follows:

<u>Item</u>	<u>Frequency</u>
a. Simulated Automatic Actuation Test	Once/Operating Cycle
b. Flow rate at normal reactor vessel operating pressure and Flow rate at 150 psig reactor pressure	Once/3 months Once/Operating Cycle

3.5.G Minimum Core and Containment Cooling System Availability

During any period when one of the standby diesel generators is inoperable, continued reactor operation is limited to 72 hours* unless operability of the diesel generator is restored within this period. During such 72 hours* all of the components in the RHR system LPCI mode and containment cooling mode shall be operable. If this requirement cannot be met, an orderly shutdown shall be initiated and the reactor shall be in the Cold Shutdown Condition within 24 hours. Specification 3.9 provides further guidance on electrical system availability.

Any combination of inoperable components in the core and containment cooling systems shall not defeat the capability of the remaining operable components to fulfill the core and containment cooling functions.

When irradiated fuel is in the reactor vessel and the reactor is in the Cold Shutdown Condition, both core spray systems and the LPCI and containment cooling subsystems of the RHR system may be inoperable provided that the shutdown cooling subsystem of the RHR system is operable in accordance with Specification 3.5.B.1.b and that no work is being done which has the potential for draining the reactor vessel.

3.5.G Surveillance of Core and Containment Cooling Systems

When it is determined that one of the standby diesel generators is inoperable, all of the components in the RHR system LPCI mode and containment cooling mode connected to the operable diesel generators shall be demonstrated to be operable immediately and daily thereafter.

*Each diesel is allowed to be out-of-service for 7 days once per year for preventive maintenance. In addition a total of two 18-day out-of-service intervals are allowed per year for major repairs of the Plant Hatch emergency diesel generators.

H. Maintenance of Filled Discharge Pipes

Whenever the core spray system, LPCI, HPCI, or RCIC are required to be operable, the discharge piping from the pump discharge of these systems to the last block valve shall be filled. The suction of the HPCI pumps shall be aligned to the condensate storage tank.

H. Maintenance of Filled Discharge Pipes

The following surveillance requirements shall be performed to assure that the discharge piping of the core spray system, LPCI, HPCI, and RCIC are filled when required:

1. Every month prior to the testing of the LPCI and core spray systems, the discharge piping of these systems shall be vented.

3.5.J Plant Service Water System1. Normal Availability

The reactor shall not be made critical from the cold shutdown condition unless the Plant Service Water System (including 4 plant service water pumps and the standby service water pump) is operable.

2. Inoperable Components

- a. The standby service water pump may be inoperable for a period not to exceed 60 days provided that an alternate Unit 1 plant service water cooling source to the 1B diesel generator is OPERABLE.
- b. One PSW pump may be inoperable for a period not to exceed 30 days provided all diesel generators are operable per Specification 4.9.A.2.a.
- c. One PSW pump and the standby service water pump may be inoperable for a period not to exceed 30 days provided all diesel generators are operable per Specification 4.9.A.2.a.
- d. Two PSW pumps or one PSW division may be inoperable for a period not to exceed 7 days provided the diesel generators associated with the operable PSW components are operable per Specification 4.9.A.2.a.

4.5.J Plant Service Water System

1. The automatic pump start functions and automatic isolation functions shall be tested once per operating cycle.

2. Inoperable Components

- a. With the standby service water subsystem inoperable for up to 60 days, provide Unit 1 service water cooling to the 1B diesel generator by verifying OPERABILITY of an alternate Unit 1 service water cooling source within 8 hours. Otherwise, declare the 1B diesel generator inoperable and take the action required by Specification 3.9.B.2.
- b. When one PSW pump is made or found to be inoperable, the standby service water pump, the three remaining PSW pumps, and both PSW divisions shall be demonstrated to be operable immediately and weekly thereafter.
- c. When one PSW pump and the standby service water pump are made or found to be inoperable, the three remaining PSW pumps, and both PSW divisions shall be demonstrated to be operable immediately and weekly thereafter.
- d. When two PSW pumps or one PSW division are made or found to be inoperable, the standby service water pump and all active components of the operable division or divisions shall be demonstrated to be operable immediately and daily thereafter.

3.5.J Plant Service Water System2. Inoperable Components (Cont'd)

- e. Two PSW pumps or one PWS division, and the standby service water pump may be inoperable for a period not to exceed 7 days provided the diesel generators associated with the operable PSW components are operable per Specification 4.9.A.2.a.

For each condition above in which the standby service water pump is inoperable, cooling water to diesel generator 1B shall be intertied with the PSW divisional piping supply.

3. Shutdown Requirements

If the requirements of Specifications 3.5.J.1 and 3.5.J.2 cannot be met the reactor shall be placed in the cold shutdown condition within 24 hours.

3.5.K Equipment Area Coolers

1. The equipment area coolers serving the Reactor Core Isolation Cooling (RCIC), High Pressure Coolant Injection (HPCI), Core Spray or Residual Heat Removal (RHR) pumps must be operable at all times when the pump or pumps served by that specific cooler is considered to be operable.
2. When an equipment area cooler is not operable, the pump(s) served by that cooler must be considered inoperable for Technical Specification purposes.

4.5.J Plant Service Water System2. Inoperable Components (Cont'd)

- e. When two PSW pumps or one PSW division, and the standby service water pump are made or found to be inoperable, all active components of the operable division or divisions shall be demonstrated to be operable immediately and daily thereafter.

When cooling water to diesel generator 1B is intertied with the PSW divisional piping supply, operability of the divisional interlock valves shall be demonstrated.

4.5.K Equipment Area Coolers

1. Each equipment area cooler is operated in conjunction with the equipment served by that particular cooler; therefore, the equipment area coolers are tested at the same frequency as the pumps which they serve.

3.5 CORE AND CONTAINMENT COOLING SYSTEMS

A. Core Spray (CS) System

1. Normal System Availability

Analyses presented in Section 6 of the FSAR and Appendix I of the HNP-2 PSAR demonstrated that the core spray system provides adequate cooling to the core to dissipate the energy associated with the loss-of-coolant accident and to limit fuel clad temperature to below 2,300°F which assures that core geometry remains intact and to limit any clad metal-water reaction to less than one percent. Core spray distribution has been shown in tests of systems similar in design to HNP-1 to exceed the minimum requirements. In addition, cooling effectiveness has been demonstrated at less than half the rated flow in simulated fuel assemblies with heater rods to duplicate the decay heat characteristics of irradiated fuel.

The intent of the CS system specifications is to prevent operation above atmospheric pressure without all associated equipment being operable. However, during operation, certain components may be out of service for the specified allowable repair times. The allowable repair times have been selected using engineering judgment based on experiences and supported by availability analysis. Assurance of the availability of the remaining systems is increased by demonstrating operability immediately and by requiring selected testing during the outage period.

When the reactor vessel pressure is atmospheric, the limiting conditions for operation are less restrictive. At atmospheric pressure, the minimum requirement is for one supply of makeup water to the core. Requiring two operable RHR pumps and one CS pump provides redundancy to ensure makeup water availability.

2. Operation with Inoperable Components

Should one core spray loop become inoperable: the remaining core spray loop and the RHR system are demonstrated to be operable to ensure their availability should the need for core cooling arise. These provide extensive margin over the operable equipment needed for adequate core cooling. With due regard for this margin, the allowable repair time of 7 days was chosen.

B. Residual Heat Removal (RHR) System (LPCI and Containment Cooling Mode)

1. Normal System Availability

The RHR system LPCI mode is designed to provide emergency cooling to the core by flooding in the event of a loss-of-coolant accident. This system is completely independent of the core spray system; however, it does function in combination with the core spray system to prevent excessive fuel clad temperatures. The LPCI mode of the RHR system and the core spray system provide adequate cooling for break areas of approximately 0.2 square feet up to and including the double-ended recirculation line break without assistance from the high-pressure emergency core cooling systems.

3.5.B.1. Normal System Availability (Continued)

Observation of the stated requirements for the containment cooling mode assures that the suppression pool and the drywell will be sufficiently cooled, following a loss-of-coolant accident, to prevent primary containment overpressurization. The containment cooling function of the RHR system is permitted only after the core has reflooded to the two-thirds core height level. This prevents inadvertently diverting water needed for core flooding to the less urgent task of containment cooling. The two-thirds core height level interlock may be manually bypassed by a keylock switch.

The intent of the RHR system specifications is to prevent operation above atmospheric pressure without all associated equipment being operable. However, during operation, certain components may be out of service for the specified allowable repair times. The allowable repair times have been selected using engineering judgment based on experiences and supported by availability analysis. Assurance of the availability of the remaining systems is increased by demonstrating operability immediately and by requiring selected testing during the outage period.

When the reactor vessel pressure is atmospheric, the limiting conditions for operation are less restrictive. At atmospheric pressure, the minimum requirement is for one supply of makeup water to the core.

2. Operation with Inoperable Components

With one LPCI pump inoperable or one LPCI subsystem inoperable, adequate core flooding is assured by the demonstrated operability of the redundant LPCI pumps and LPCI subsystem, and the Core Spray system. The reduced redundancy justifies the specified 7 day out-of-service period.

3.9 AUXILIARY ELECTRICAL SYSTEMSApplicability

The Limiting Conditions for Operation apply to the auxiliary electrical power systems.

Objective

The objective of the Limiting Conditions for Operation is to assure an adequate supply of electrical power for operation of those systems required for safety.

SpecificationsA. Requirements For Reactor Startup

The reactor shall not be made critical from the Cold Shutdown Condition unless all of the following conditions are satisfied:

1. Offsite Power Sources

At least two 230 kV offsite transmission lines shall be available and each shall be capable of supplying auxiliary power to the emergency 4160 volt buses (1E, 1F, and 1G) and each shall be capable of supplying power to both startup auxiliary transformers (1C and 1D).

2. Standby AC Power Supply (Diesel Generators 1A, 1B, and 1C)

Three diesel generators 1A, 1B and 1C) shall be operable and capable of supplying power to the emergency 4160 volt buses (1E, 1F, and 1G).

For each diesel generator to be operable and capable of supplying power, the following conditions must be met:

4.9 AUXILIARY ELECTRICAL SYSTEMSApplicability

The Surveillance Requirements apply to the periodic testing requirements of the auxiliary electrical power systems.

Objective

The objective of the Surveillance Requirements is to verify the operability of the auxiliary electrical systems.

SpecificationsA. Auxiliary Electrical Systems Equipment

Tests shall be performed at scheduled intervals as follows to detect deterioration of equipment and to demonstrate that auxiliary electrical systems equipment and components are operable.

1. Offsite Power Sources

Verify correct breaker alignments and indicated power availability at least once per 7 days.

2. Standby AC Power Supply (Diesel Generators 1A, 1B, and 1C)

The following periodic tests and surveillance of the standby AC power supply (Diesel Generators 1A, 1B, and 1C) shall be performed:

3.9.A.2 Standby AC Power Supply (Diesel Generators 1A, 1B, and 1C)
(Continued)

- a. Operability
The diesel generator itself and its auxiliaries are operable.
- b. Diesel Battery (125 Volt)
Each 125 volt diesel battery is operable and capable of supplying the required load.
- c. Battery Charger
An operable battery charger is available. Each battery charger shall have adequate capacity to restore its battery to full charge within 24 hours from a discharged condition while carrying the DC load.
- d. Diesel Fuel
There shall be a minimum of 80,000 gallons of acceptable diesel fuel in the diesel fuel storage tanks.

4.9.A.2 Standby AC Power Supply (Diesel Generators 1A, 1B, and 1C)
(Continued)

- a. Operability
Each diesel generator shall be manually started and loaded to demonstrate operational readiness in accordance with the frequency specified in Table 4.9-1 on a staggered test basis. Verify that each diesel starts from ambient condition and accelerates to synchronous speed in < 12 seconds, is loaded > 1710 kw in < 5 minutes, and operates for > 60 minutes. During the generator test, the starting air compressor shall be checked for operation and for its ability to recharge the air system.
- b. Diesel Battery (125 Volt)
Each 125 volt diesel battery shall be subjected to the same periodic surveillance as the plant batteries in Specification 4.9.A.3.
- c. Battery Charger
Indicators shall be provided to monitor the status of the battery charger supply. This instrumentation shall include indication of output current and output voltage.
- d. Diesel Fuel
Each month the quantity of diesel fuel available in each fuel storage tank shall be measured and recorded.

At least once per 92 days by verifying that a sample of diesel fuel from the fuel storage tank, obtained in accordance with ASTM-D-270-65, is within the acceptable limits specified in Table 1 of ASTM D975-74 when checked for viscosity, water and sediment.

4.9.A.2 Standby AC Power Supply (Diesel
Generators 1A, 1B, and 1C)
(Continued)

e. Fuel Oil Transfer Pumps

The operation of the diesel
fuel oil transfer pumps shall
be demonstrated once each month.

3.9.B.1. One Startup Auxiliary Transformer (1C or 1D) Inoperable or Only One Offsite Power Source Available (230 kV Transmission Line)

Reactor operation is permissible for seven days from the date that one startup auxiliary transformer (1C or 1D) is inoperable or incoming power is available from only one 230 kV offsite transmission line provided the increased Surveillance Requirements as stated in Specification 4.9.B.1 are implemented.

2. One Diesel Generator (1A, 1B, or 1C) Inoperable

From and after the date that one of the diesel generators is made or found to be inoperable, continued reactor operation is permissible in accordance with Specification 3.5.G for a period not to exceed 72 hours* provided that two 230 kV offsite transmission lines are available, both remaining diesel generators and associated emergency buses are operable, and the increased Surveillance Requirements as stated in Specification 4.9.B.2 are implemented.

3. One 125/250 Volt DC Power System (Plant Battery 1A or 1B) Inoperable

From and after the date that one of the two 125/250 volt plant batteries is made or found to be inoperable, continued reactor operation is permissible during the succeeding seven (7) days within electrical safety considerations, provided repair work is initiated immediately to return the failed component to an operable state, Specification 3.5.G is satisfied,

4.9.B.1. One Startup Auxiliary Transformer (1C or 1D) Inoperable or Only One Offsite Power Source Available (230 kV Transmission Line)

When it is established that one startup auxiliary transformer (1C or 1D) is inoperable or incoming power is available from only one 230 kV offsite transmission line, verify correct breaker alignments and indicated power availability within one hour and at least once per eight hours thereafter, and perform Surveillance Requirements 4.9.A.2.a within 24 hours unless surveillance has been performed within the previous seven days.

2. One Diesel Generator (1A, 1B, or 1C) Inoperable

When it is established that one diesel generator (1A, 1B, or 1C) is inoperable, verify correct breaker alignments and indicated power availability within one hour and at least once per eight hours thereafter, and perform Surveillance Requirement 4.9.A.2.a within 24 hours.

3. One 125/250 Volt DC Power System (Plant Battery 1A or 1B) Inoperable

When it is established that one of the 125/250 volt DC power systems (plant battery 1A or 1B) is made or found to be inoperable, the pilot cell voltage and specific gravity and the overall battery voltage of the operable plant battery shall be tested daily and determined to be satisfactory.

*Each diesel is allowed to be out of service for 7 days once per year for preventive maintenance. In addition a total of two 18-day out-of-service intervals are allowed per year for major repairs of the Plant Hatch emergency diesel generators.

Table 4.9-1

DIESEL GENERATOR TEST SCHEDULE

<u>Number of Failures In Last 100 Valid Tests*</u>	<u>Test Frequency</u>
<u>< 2</u>	At least once per 14 days
<u>> 3</u>	At least once per 7 days

*Criteria for determining number of failures and number of valid tests shall be in accordance with Regulatory Position C.2.e of Regulatory Guide 1.108, Revision 1, August 1977, except that the last 100 tests are determined on a per diesel basis.

ADMINISTRATIVE CONTROLS

ANNUAL REPORTS (Continued)

6.9.1.5 Reports required on an annual basis shall include:

- a. A tabulation on an annual basis of the number of station, utility and other personnel, including contractors, receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job functions,² e.g., reactor operations and surveillance, inservice inspection routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.
- b. Documentation of all challenges to safety/relief valves.
- c. A diesel generator data report which provides the number of valid tests and the number of failures to start on demand (upon a valid start signal) for each diesel generator.
- d. Any other unit unique reports required on an annual basis.

MONTHLY OPERATING REPORT

6.9.1.6 Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis to the Director, Office of Management and Program Analysis, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the Regional Office, of Inspection and Enforcement no later than the 15th of each month following the calendar month covered by the report.

REPORTABLE OCCURENCES

6.9.1.7 The REPORTABLE OCCURRENCES of Specifications 6.9.1.8 and 6.9.1.9 below, including corrective actions and measures to prevent recurrence, shall be reported to the NRC. Supplemental reports shall be required to fully describe final resolution of occurrence. In case of corrected or supplemental reports, a licensee event report shall be completed and reference shall be made to the original report date.

²This tabulation supplements the requirements of § 20.407 of 10 CFR Part 20.

NRC DOCKET 50-366
OPERATING LICENSE NPF-5
EDWIN I. HATCH NUCLEAR PLANT-UNIT 2
PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS

The proposed changes to the Technical Specifications (Appendix A to Operating License NPF-5) would be incorporated as follows:

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3/4.8 ELECTRICAL POWER SYSTEMS

3/4.8.1 A.C. SOURCES

A.C. SOURCES - OPERATING

LIMITING CONDITION FOR OPERATION

3.8.1.1 As a minimum, the following A.C. electrical power sources shall be OPERABLE:

- a. Two physically independent circuits between the offsite transmission network and the onsite Class 1E distribution system, and
- b. Three separate and independent diesel generators, each with:
 1. A separate day tank containing a minimum of 900 gallons of fuel,
 2. A separate fuel storage tank containing a minimum of 32,000 gallons of fuel, and
 3. A separate fuel transfer pump.

APPLICABILITY: CONDITIONS 1, 2, and 3.

ACTION:

- a. With one offsite circuit of the above required A.C. electrical power sources inoperable, demonstrate the OPERABILITY of the remaining offsite A.C. source by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter, and performing Surveillance Requirement 4.8.1.1.2.a.4 within 24 hours unless surveillance has been performed within the previous 7 days. Restore at least two offsite circuits to OPERABLE status within 72 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- b. With one diesel generator of the above required A.C. electrical power sources inoperable, demonstrate the OPERABILITY of the remaining A.C. sources by performing Surveillance Requirement 4.8.1.1.1.a within one hour and at least once per 8 hours thereafter, and by performing Surveillance Requirement 4.8.1.1.2.a.4 within 24 hours. Restore at least three diesel generators to OPERABLE status within 72 hours* or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

*Each diesel is allowed to be out of service for 7 days once per year for preventive maintenance. In addition a total of two 18-day out-of-service intervals are allowed per year for major repairs of the Plant Hatch emergency diesel generators.

ELECTRICAL POWER SYSTEMS

LIMITING CONDITION FOR OPERATION (Continued)

ACTION (Continued)

- c. With one offsite circuit and one diesel generator of the above required A.C. electrical power sources inoperable, demonstrate the OPERABILITY of the remaining A.C. sources by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter, and by performing Surveillance Requirement 4.8.1.1.2.a.4 within 8 hours. Restore at least one of the inoperable sources to OPERABLE status within 12 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours. Restore the other AC power source (offsite circuit or diesel generator set) to operable status in accordance with the provisions of Section 3.8.1.1 Action Statements a or b, as appropriate from the time of initial loss.
- d. With two of the above required offsite A.C. circuits inoperable, demonstrate the OPERABILITY of three diesel generators by performing Surveillance Requirement 4.8.1.1.2.a.4 within 8 hours, unless the diesel generators are already operating; restore at least one of the inoperable offsite sources to OPERABLE status within 24 hours or be in at least HOT SHUTDOWN within the next 12 hours. With only one offsite source restored, restore the remaining offsite circuit to OPERABLE status within 72 hours from the time of initial loss or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- e. With two of the above required diesel generators inoperable, demonstrate the OPERABILITY of the remaining A.C. sources by performing Surveillance Requirement 4.8.1.1.1.a within one hour and at least once per 8 hours thereafter, and by performing Surveillance Requirement 4.8.1.1.2.a.4 within 4 hours. Restore at least one of the inoperable diesel generators to OPERABLE status within 24 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours. Restore three diesel generators to OPERABLE status within 72 hours* from time of initial loss or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

*Each diesel is allowed to be out of service for 7 days once per year for preventive maintenance. In addition a total of two 18-day out-of-service intervals are allowed per year for major repairs of the Plant Hatch emergency diesel generators.

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS

4.8.1.1.1 Each of the above required independent circuits between the offsite transmission network and the onsite Class 1E distribution system shall be:

- a. Determined OPERABLE at least once per 7 days by verifying correct breaker alignments and indicated power availability, and
- b. Demonstrated OPERABLE at least once per 18 months during shutdown by transferring, manually and automatically, unit power supply from the normal circuit to the alternate circuit.

4.8.1.1.2 Each diesel generator shall be demonstrated OPERABLE:

- a. In accordance with the frequency specified in Table 4.8.1.1.2-1 on a STAGGERED TEST BASIS by:
 1. Verifying the fuel level in the day fuel tanks.
 2. Verifying the fuel level in the plant fuel storage tank.
 3. Verifying the fuel transfer pump can be started and transfers fuel from the storage system to the day tank.
 4. Verifying the diesel starts from ambient condition and accelerates to synchronous speed in ≤ 12 seconds, is loaded ≥ 2674 kw for diesel generators 2A, ≥ 2360 kw for diesel generator 1B, and ≥ 2742 kw for diesel generator 2C in ≤ 5 minutes, and operates for ≥ 60 minutes thereafter.
 5. Verifying the diesel generator is aligned to provide standby power to the associated emergency busses.
 6. Verifying the pressure in both diesel air start receivers to be ≥ 225 psig.
- b. At least once per 92 days by verifying that a sample of diesel fuel from the fuel storage tank, obtained in accordance with ASTM-D270-65, is within the acceptable limits specified in Table 1 of ASTM D975-74 when checked for viscosity, water and sediment.

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- c. At least once per 18 months during shutdown by:
1. Subjecting the diesel to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations for this class of standby service.
 2. Verifying that the automatic load sequence timer is OPERABLE with the interval between each load block within $\pm 10\%$ of its design interval.
 3. Verifying the generator capability to reject a load of > 798 kw while maintaining voltage at 4160 ± 400 volts and frequency at 60 ± 2 Hz.

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

9. Verifying the diesel generator operates for at least 24 hours. During the first 22 hours of this test, the diesel generator shall be loaded \geq 2764 KW for diesel generator 2A, \geq 2360 KW for diesel generator 1B and \geq 2742 KW for diesel generator 2C and during the remaining 2 hours of this test, the diesel generator shall be loaded \geq 2950 KW for diesel generator 2A, \geq 2547 KW for diesel generator 1B and \geq 2928 KW for diesel generator 2C. Within 5 minutes after completing this 24 hour test, repeat Specification 4.8.1.1.2.c.5.
10. Verifying that the auto-connected loads to each diesel generator do not exceed the 2 hour rating of 3135 kw.
11. Verifying the diesel generator's capability to:
 - a) Synchronize with the offsite power source while the generator is loaded with its emergency loads upon a simulated restoration of offsite power,
 - b) Transfer its loads to the offsite power source, and
 - c) Proceed through its shutdown sequence.
12. Verifying that with the diesel generator operating in a test mode (connected to its bus), a simulated safety injection signal overrides the test mode by (1) returning the diesel generator to standby operation and (2) automatically energizes the emergency loads with offsite power.
13. Verifying that the fuel transfer pump transfers fuel from each fuel storage tank to the day tank of each diesel via the installed cross connection lines.
 - d. At least once per 5 years by verifying that with both air start receivers pressurized to \leq 225 psig and the compressors secured, the diesel generator starts at least 5 times from ambient conditions and accelerates to synchronous speed in \leq 12 seconds.
 - e. At least once per 10 years or after any modifications which could affect diesel generator interdependence by starting both diesel generators simultaneously, during shutdown, and verifying that both diesel generators accelerate to synchronous speed in \leq 12 seconds.

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

4.8.1.1.4 Reports - See Specification 6.9.1.5.c.

TABLE 4.8.1.1.2-1

DIESEL GENERATOR TEST SCHEDULE

Number of Failures In
Last 100 Valid Tests*

Test Frequency

≤ 2

At least once per 14 days

≥ 3

At least once per 7 days

*Criteria for determining number of failures and number of valid tests shall be in accordance with Regulatory Position C.2.e of Regulatory Guide 1.108, Revision 1, August 1977, except that the last 100 tests are determined on a per diesel basis.

ADMINISTRATIVE CONTROLS

ANNUAL REPORTS (Continued)

6.9.1.5 Reports required on an annual basis shall include:

- a. A tabulation on an annual basis of the number of station, utility and other personnel, including contractors, receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job functions,² e.g., reactor operations and surveillance, inservice inspection routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.
- b. Documentation of all challenges to safety/relief valves.
- c. A diesel generator data report which provides the number of valid tests and the number of failures to start on demand (upon a valid start signal) for each diesel generator.
- d. Any other unit unique reports required on an annual basis.

MONTHLY OPERATING REPORT

6.9.1.6 Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis to the Director, Office of Management and Program Analysis, U. S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the Regional Office, of Inspection and Enforcement no later than the 15th of each month following the calendar month covered by the report.

REPORTABLE OCCURRENCES

6.9.1.7 The REPORTABLE OCCURRENCES of Specifications 6.9.1.8 and 6.9.1.9 below, including corrective actions and measures to prevent recurrence, shall be reported to the NRC. Supplemental reports shall be required to fully describe final resolution of occurrence. In case of corrected or supplemental reports, a licensee event report shall be completed and reference shall be made to the original report date.

²This tabulation supplements the requirements of § 20.407 of 10 CFR Part 20.

ATTACHMENT 2

SAFETY EVALUATION FOR
PROPOSED CHANGES TO THE
TECHNICAL SPECIFICATIONS

EDWIN I. HATCH NUCLEAR PLANT-UNITS 1 AND 2
SAFETY EVALUATION FOR EMERGENCY POWER SYSTEMS
TECHNICAL SPECIFICATION CHANGE

I. BACKGROUND:

The Hatch 1 and 2 Technical Specifications contain Limiting Conditions for Operation and Surveillance Requirements to maintain diesel generator operability. Georgia Power Company and the diesel manufacturer (Colt Industries) have determined that some technical specification requirements are not beneficial to the performance of the onsite emergency power system. Therefore, the proposed changes to the technical specifications (Attachment 1) provide improvements which we believe will enhance the reliability of the diesel generators.

II. REFERENCES:

- o Hatch 1 Technical Specifications 3.5/4.5, "Core and Containment Cooling Systems"; 3.9/4.9, "Auxiliary Electrical Systems"; and 6.9, "Administrative Controls."
- o Hatch 1 FSAR Section 8.4, "Standby AC Power Supply"; 6.4.3, "Core Spray System"; 6.4.4, "Low-Pressure Coolant Injection"; 10.6, "RHR Service Water System"; and 10.7, "Plant Service Water System."
- o Hatch 2 Technical Specifications 3/4.8.1, "AC Sources- Operating," and 6.9, "Administrative Controls."
- o Hatch 2 FSAR Section 8.3, "Onsite Power System"; 6.3, "Emergency Core Cooling System"; 9.2, "Water System."
- o Regulatory Guide 1.108, Revision 1, August 1977, "Periodic Testing of Diesel Generator Units Used as Onsite Electric Power Systems at Nuclear Power Plants."
- o NRC Generic Letter 84-15, July 2, 1984.
- o Title 10, Chapter 1, Code of Federal Regulations, Part 50.73, "Licensee Event Report System," September 30, 1983.

III. BASES:

The Hatch 1 and 2 Technical Specifications require that a minimum of two offsite AC electrical power sources and three onsite diesel

generator AC electrical power sources be operable. Hatch 1 Technical Specification 4.9.A.2.a requires that each diesel generator be tested monthly. Hatch 2 Technical Specification 4.8.1.1.2.a implements the testing schedule given in Regulatory Guide 1.108 for routine periodic surveillance testing of the diesel generators. Regulatory Guide 1.108 relates the frequency of testing to the number of test failures on a per nuclear unit basis, i.e. failures totaled from all three diesels. The test intervals vary in four steps proceeding from 31 days, to 14 days, to 7 days, and finally as frequent as 3 days depending on the number of test failures experienced.

Georgia Power Company proposes a different test schedule for Hatch 1 (Reference proposed Surveillance Requirement 4.9.A.2.a) and Hatch 2 (Reference proposed Surveillance Requirement 4.8.1.1.2.a) using the general criteria given in Regulatory Guide 1.108 with the exception that routine testing be conducted at intervals of 14 days and 7 days only. The diesel manufacturer has notified Georgia Power that a 31 day test frequency is too long to provide reasonable assurance of the diesels capability to start and provide emergency power, and that testing every three days on a routine basis is too frequent. Frequent testing accelerates wear to the diesels, and will not enhance the reliability of the diesels. Also, it is our engineering judgement that a three-day test interval may generate conditions adverse to long-term reliability of the diesels.

The proposed test schedule continues to depend upon test failure experience but on a per diesel basis rather than on a per nuclear unit basis. The test schedule should not reflect the idea that failures experienced on a particular diesel would adversely affect the performance of the other diesels. However, the test schedule should reflect individual diesel generator reliability. Therefore, failures on one diesel should not force increased testing of the other diesels. This change is also supported by NRC Generic Letter 84-15.

The proposed changes to the Hatch 1 Technical Specifications (Reference proposed Surveillance Requirements 4.5.A.2, 4.5.B.2., 4.5.C.3, and 4.5.J.2) also eliminate diesel generator testing when certain emergency core cooling systems (ECCS, i.e., Core Spray, and Low Pressure Coolant Injection,) and essential service water systems (Plant Service Water and RHR Service Water) are declared inoperable. Similar to the reasons discussed above, regarding the requirements of Regulatory Guide 1.108, failures experienced in the ECCS and RHR service water systems will not adversely affect the performance of the diesel generators. Failure of

a division of Plant Service Water will cause only the diesel associated with that division to be declared inoperable. Therefore, increased testing of the diesel generators under such circumstances should not be required. Also, this proposed change is consistent with the philosophy of Standard Technical Specifications, including Hatch 2, which do not require additional testing of the diesel generators when other safety related systems are declared inoperable and Generic Letter 84-15 which encourages licensees to delete this requirement to avoid excessive testing of the diesels.

Moreover, the proposed testing requirements for the diesel generators described above represent a more frequent routine testing interval than currently exists in the Hatch 1 Technical Specifications (14/7-day versus monthly), and consequently, justifies the removal of the diesel generator testing requirements associated with ECCS and essential service water inoperability.

Hatch 2 Technical Specification 3.8.1.1, Action Statement a., requires that every diesel be tested within one hour and every eight hours thereafter in the event an emergency AC source or offsite power source is declared inoperable. To be consistent with the philosophy of reducing excessive testing and thereby enhancing the reliability of the diesel generators, Georgia Power proposes that when an emergency AC source is declared inoperable, the remaining diesels be demonstrated operable within 24 hours. Any additional testing should not be required. Diesel testing within the first 24 hours will provide assurance that no starting problems exist with the diesels and will provide additional time for inspection prior to the test. A 24 hour interval will also eliminate abusive quick diesel startups and stops that are presently required to test all of them within one hour. Such testing is abusive to the diesel generators since they should each be operated for at least one hour when started. For the specific case when one of the offsite emergency sources is declared inoperable, diesel failure is not involved. Therefore, demonstration of their operability should not be required if they have been successfully tested within the past seven days under routine surveillance. This again will reduce the potential for excessive testing. Moreover, little or no additional reliability assurance is gained from increasing testing beyond that required for routine surveillance. Also this proposed change is consistent with the Technical Specifications given in Generic Letter 84-15.

To accommodate the recommendations described above, the proposed changes to Hatch 2 Technical Specification 3.8.1.1 separate existing Action Statement a. into two new Action Statements, a. and b. Also,

existing Action Statements b., c., and d. are changed to Action Statements c., d., and e. in the proposed changes, and are modified to be consistent with the requirements of proposed Action Statements a. and b. In addition, proposed Action Statement e. changed the allowable time from 2 hours to 24 hours to restore one of the two inoperable diesels to operable status. Two hours does not allow enough time to troubleshoot a problem to determine the cause of inoperability. A two hour limiting condition for operation may result in emergency repairs which may not restore full reliability to the diesel. In addition, existing Action Statement c. allows 24 hours to restore one of two inoperable offsite power circuits (preferred source of emergency power) to operable status. Therefore, the diesels should have the same LCO requirement as allowed for offsite power.

The Hatch 1 Technical Specifications similarly contain additional diesel generator testing requirements when an offsite power source or diesel generator is declared inoperable. (Reference Surveillance Requirements 4.9.B.1 and 4.9.B.2.) Therefore, Georgia Power requests that the requirements contained in the proposed changes to Hatch 2 Technical Specifications (Reference proposed Specification 3.8.1.1, Action Statements a. and b.) for these conditions be adopted for Hatch 1 Surveillance Requirements 4.9.B.1 and 4.9.B.2, respectively, in order to eliminate excessive testing of the diesel generators. Similarly, the additional diesel testing required by Hatch 1 Surveillance Requirement 4.5.G should also be deleted to eliminate excessive testing when a diesel generator is declared inoperable. Surveillance requirements have been incorporated for offsite power sources (Reference proposed Hatch 1 Surveillance Requirements 4.9.A.1) to verify offsite power availability and breaker alignments. Such requirements are presently included in the Hatch 2 Technical Specifications (Reference Hatch 2 Surveillance Requirement 4.8.1.1.1.a).

Georgia Power proposes to revise the Limiting Conditions of Operation (LCO) for Hatch 1 and 2 with one diesels inoperable. Hatch 1 currently has a 7-day period (reference specifications 3.5.G and 3.9.B.2) to restore operability while Hatch 2 has a 3-day period (reference specification 3.8.1.1). It is proposed that both units have 72 hours to restore operability of the diesels with a 7-day once/year/diesel exception to allow for preventive maintenance and two 18-day exceptions per year for the entire plant (i.e., all five emergency diesels) for major repairs. Experience has shown that seven days are required to do preventive maintenance and with the current Unit 2 3-day LCO (with no exceptions) the plant would need to be shutdown for at least seven days per diesel per year in order to do maintenance. The proposed LCO

change would prevent any forced outages in order to do preventive maintenance. Currently, Unit 1 has a 7-day LCO and does not have this problem. However, since it is proposed that both Units have the same LCO's the 7-day exception for preventive maintenance would be required for Unit 1 also. It is also proposed to allow two 18-day exceptions per year for all emergency diesels. An 18-day LCO was recommended by the diesel manufacturer to allow time to repair the diesels in case of a major failure. A shorter time period could result in inadequate investigations and quick repairs that do not correct the actual problem and result in subsequent failures. Failure experience at Plant Hatch on diesel 2C has shown that an 18 day LCO would allow adequate time to accommodate a major repair. In addition a study was performed using probabilistic risk assessment methodology in order to assess the effect upon plant safety of the proposed LCO scheme. This study assessed the change in the frequency of core damage as a result of the proposed LCO from the LCO scheme currently in use. The study concluded that adoption of the proposed LCO scheme decreases the estimated core damage frequency for Unit 1, thereby increasing the margin of plant safety. The estimated core damage frequency for Unit 2 increases by less than 6 percent. However this slight increase in the frequency of core damage is of such small magnitude that it clearly lies within the acceptable uncertainty bounds of the core damage frequency of a nuclear power plant given the current state-of-the-art knowledge about the PRA models, failure data, and the design and operation of the plants. Therefore it can be concluded that the effect on Unit 2 plant safety due to the proposed LCO scheme is insignificant.

To reduce wear of the diesel generators, it has been recommended by the manufacturer that testing required by Hatch 2 Surveillance Requirements 4.8.1.1.2.a.4 and 4.8.1.1.2.a.5 be modified in addition to the changes to the action statements contained in Specification 3.8.1.1 discussed above. Requiring the diesels to reach synchronous speed in less than or equal to 12 seconds (Specification 4.8.1.1.2.a.4) results in abusive quick starts and stops of the diesels when additional surveillance is required by the Action Statements for Specification 3.8.1.1. Requiring the diesels to accept rated loads in less than or equal to 120 seconds (Specification 4.8.1.1.2.a.5) represents a strenuous routine test. The diesel manufacturer recommends that 5 minutes be allowed for the diesels to accept rated loads, thus providing more time for engine preconditioning prior to loading. Therefore, it is proposed that these two test requirements be combined to form one test regardless if it

is routine or required by an Action Statement. (Reference proposed Specification 4.8.1.1.2.a.4.) As a point of clarification, the existing requirement to load the diesel generators in 120 seconds does not represent a licensing basis for the plant. Therefore, increasing the time to 5 minutes will not compromise plant safety. Moreover, the 18 month surveillance testing requirement for the diesel generators (Reference Surveillance Requirement 4.8.1.1.2.C) verifies the capability of the diesels to function in accordance with design requirements.

Regarding load testing of the diesel generators, the diesel manufacturer recommends that the diesels always be loaded to a minimum of 60% of rated loads when started. The Hatch 2 Technical Specifications meet this minimum test requirement since they require the diesel generators to be tested at rated loads. However, the Hatch 1 Technical Specifications (Surveillance Requirement 4.9.A.2.a) require the diesel generators to be tested at 50% or greater of rated load when demonstrating operability. Therefore, it is proposed that the Hatch 1 diesel generators be tested $\geq 60\%$ (1710 kW) of the continuous rating (2850 kW) to agree with the diesel manufacturer's recommendations. It is also proposed (Reference Hatch 1 Surveillance Requirement 4.9.A.2.a) to similarly incorporate the testing requirements that were discussed above for Hatch 2 (Reference proposed Hatch 2 Surveillance Requirement 4.8.1.1.2.a.4) into the Hatch 1 Technical Specifications. Again, there is no licensing basis for a 120 second loading requirement for Hatch 1, and at each scheduled refueling outage, surveillance testing requirements (Reference Hatch 1 Specification 4.9.A.7) verifies the diesels capability to function in accordance with design requirements.

As another effort to reduce the number of unnecessary or abusive tests of the diesel generators, and thereby increase reliability, it has been recommended by the diesel manufacturer that Hatch 2 Surveillance Requirement 4.8.1.1.2.c.14 be modified. Currently, this 18-month surveillance requirement requires five successive starts of the diesels to verify the capability of the air start receivers. It is proposed (Referenced proposed Specification 4.8.1.1.2.d) that this test be done only once per five years since the primary reason is to demonstrate adequate equipment sizing of the air start system. Reverification of the performance of the air start receivers will be maintained, but on a reduced time frequency (every five years). As a result, the diesels will be subjected to a significantly reduced number of abusive tests which require quick engine starts and stops.

Overload testing of the diesel generators does not contribute to the dependability or the longevity of the equipment, but instead accelerates wear. It may also impede seating or reseating of engine power parts, whether they are new or have been subjected to prior distress. Hatch 2 Surveillance Requirement 4.8.1.1.2.c.9 presently requires a 24-hour test of the diesel generators. During the first two hours of the test, the diesel is placed in an overload condition. The loading on the diesel is then reduced to its rated loads the following 22 hours. This represents an abusive test requirement for the diesels that needs to be changed. Therefore, it is proposed (Reference proposed Specification 4.8.1.1.2.c.9) per the diesel manufacturer's recommendation that the 24-hour test be modified to require rated load testing of the diesels during the first 22 hours to allow engine preconditioning, and that the diesels then be subjected to overload operation during the last two hours of the test.

It is proposed that requirements section 4.8.1.1.4 "Reporting Requirements" of the Unit 2 Technical Specifications be deleted, since the Reportable Occurrences section of the Technical Specifications has been superseded by 10 CFR 50.73. However to keep the NRC informed of the diesel generators' reliabilities an annual report requirement has been added to section 6.9.1.5 of the Unit 1 and Unit 2 Technical Specifications in accordance with Generic Letter 84-15. Section 4.8.1.1.4 of the Unit 2 Technical Specifications will reference section 6.9.1.5.

IV. CONCLUSION

The proposed changes to the Hatch 1 and 2 Technical Specifications are consistent with the recommendations made by the diesel generator manufacturer and are compatible with the recommendations of Generic Letter 84-15. They represent an optimization of the current testing requirements and will provide positive improvements to diesel generator reliability. For these reasons, the Plant Review Board and Safety Review Board have concluded that the probability of occurrence or consequences of a previously analyzed accident or malfunction of equipment important to safety is not increased, nor has the possibility of a previously unanalyzed accident or malfunction of equipment been created. Margins of plant safety have not been decreased. Therefore, the proposed changes to the technical specifications do not constitute an unreviewed safety question.

ATTACHMENT 3

SIGNIFICANT HAZARDS EVALUATION
FOR PROPOSED CHANGES TO THE
TECHNICAL SPECIFICATIONS

NRC DOCKET 50-321
OPERATING LICENSE DRP-54
EDWIN I. HATCH NUCLEAR PLANT UNIT 1
REQUEST TO AMEND TECHNICAL SPECIFICATIONS

Pursuant to 10 CFR 50.92, Georgia Power has evaluated the proposed amendment and has determined that its adoption would not involve a significant hazard. The basis for this determination is as follows:

a. PROPOSED CHANGE

Change the Core Spray system Limiting Conditions for Operation (3.5.A.2), Surveillance Requirements (4.5.A.2), and Bases (3.5.A.2) to delete the requirement for demonstrating diesel generator operability when Core Spray system components are inoperable.

Change the LPCI system Limiting Conditions for Operation (3.5.B.2.a and 3.5.B.2.b), Surveillance Requirements (4.5.B.2.a and 4.5.B.2.b), and Bases (3.5.B.2) to delete the requirement for demonstrating diesel generator operability when LPCI system components are inoperable.

Change the RHR service water system Surveillance Requirements (4.5.C.3) to delete the requirement for demonstrating diesel generator operability when two RHR service water pumps are inoperable.

BASIS

These proposed changes are consistent with the philosophy of Standard Technical Specifications (including Hatch 2) which do not require additional testing of the diesel generators when other safety related systems are declared inoperable and Generic Letter 84-15 which encourages licensees to delete this requirement to avoid excessive testing of the diesels. In addition, the proposed testing requirements for the diesel generators described in item d. below represent a more frequent routine test interval than currently exists in the Hatch 1 Technical Specifications. Also, a failure of core spray, LPCI, or RHR service water system components will not adversely effect the performance of the diesel generators.

GPC has reviewed the proposed changes and considers them not to involve a significant hazards consideration for the following reasons:

- (1) The proposed changes will not significantly increase the probability or consequences of an accident previously evaluated, because they will eliminate a practice of unnecessary and abusive diesel generator testing contained in the technical specifications.

Such testing contributes to accelerated diesel generator wear, which consequently degrades their reliability and availability.

- (2) The proposed changes will not create the possibility of a new or different accident from any accident previously evaluated, because no physical modifications are required to be made to the plant in conjunction with these proposed changes. Therefore, performance of the onsite emergency power system as described in the FSAR remains unchanged.

- (3) The proposed changes will not involve a significant reduction in a margin of safety, because a failure of the core spray, LPCI, or RHR service water system components will not adversely effect the performance of the diesel generators.

b. PROPOSED CHANGE

Change the Plant Service Water System Limiting Conditions for Operation (3.5.J.2) and Surveillance Requirements (4.5.J.2) to delete the requirement for demonstrating diesel generator operability when Plant Service Water System components are inoperable.

BASIS

These changes are consistent with the philosophy of Standard Technical Specifications (including Hatch 2) which do not require additional testing of the diesel generators when other safety related systems are declared inoperable and Generic Letter 84-15 which encourages licensees to delete this requirement to avoid excessive testing of the diesels. In addition, the proposed testing requirements for the diesel generators described in item d. below represent a more frequent routine test interval than currently exists in the Hatch 1 Technical Specifications. Also, a failure of a division of Plant Service Water will cause only the diesel generator associated with that division to be inoperable.

GPC has reviewed the proposed changes and considers them not to involve a significant hazards consideration for the following reasons:

- (1) The proposed changes will not significantly increase the probability or consequences of an accident previously evaluated, because it will eliminate a practice of unnecessary and abusive diesel generator testing contained in the technical specifications. Such testing contributes to accelerated diesel generator wear, which consequently degrades their reliability and availability.
- (2) The proposed changes will not create the possibility of a new or different accident from any accident previously evaluated, because no physical modifications are required to be made to the plant in conjunction with these proposed changes. Therefore, performance of the onsite emergency power system as described in the FSAR remains unchanged.
- (3) The proposed changes will not involve a significant reduction in a margin of safety, because a failure of a division of Plant Service Water will cause only the diesel generator associated with that division to be inoperable.

c. PROPOSED CHANGE

Change the Auxiliary Electrical Systems Surveillance Requirements (4.9.A.1, 4.9.B.1, and 4.9.B.2) by adding a requirement to verify offsite power availability and breaker alignments.

BASIS

These changes constitute additional surveillance requirements not presently included in the Hatch 1 Technical Specifications. Such requirements are included in the Hatch 2 Technical Specifications. Therefore, these changes are being made to make both units technical specifications consistent.

GPC has reviewed these proposed changes and considers them not to involve a significant hazards consideration, because they represent more conservative and restrictive technical specification requirements than that which are currently in place. Consequently, these changes are consistent with Item (ii) of the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14,870 of the April 6, 1983, issue of the Federal Register, and will not result in a significant hazards consideration.

d. PROPOSED CHANGE

Change the Standby AC Power Supply Surveillance Requirements (4.9.A.2.a) to be consistent with the diesel manufacturers recommendations regarding routine testing of the diesel generators.

BASIS

The diesel manufacturer has stated that the current monthly testing requirement is too long to provide reasonable assurance of the diesels capability to start and provide emergency power. The general criteria given in Regulatory Guide 1.108 has been recommended with the exceptions discussed below. Regulatory Guide 1.108 relates the frequency of testing to the number of test failures on a per nuclear unit basis, i.e. failures totaled from all three diesels. The test intervals vary in four steps proceeding from 31 days, to 14 days, to 7 days, and finally as frequent as 3 days depending on the number of test failures experienced.

The diesel manufacturer has recommended that routine testing be conducted at intervals of 14 and 7 days only. The regulatory guide testing requirement of every 31 days is as discussed above too infrequent, and the testing requirement of every 3 days is too frequent for routine testing. Frequent testing accelerates wear to the diesels and will not enhance their reliability.

The proposed test schedule for routine testing will depend on test failure experience as discussed in Regulatory Guide 1.108 with the exception that failure experience will be determined on a per diesel basis rather than on a per nuclear unit basis. The test schedule should not reflect the idea that failures experienced on a particular diesel would adversely affect the performance of the other diesels. However, the test schedule should reflect individual diesel generator reliability. Therefore, failures on one diesel should not force increase testing of the other diesels. This is consistent with the recommendations of Generic Letter 84-15.

The diesel manufacturer has also stated that the current minimum load testing requirement of 50% to demonstrate operability should be increased to 60%, and that the diesels be allowed 5 minutes to accept loads to allow more time for engine preconditioning prior to loading. The diesels capability to function in accordance with design requirements will continue to be verified per Specification 4.9.A.7.

GPC has reviewed these proposed changes and considers them not to involve a significant hazards consideration, because they represent more conservative and restrictive technical specification requirements

than that which are currently in place. Consequently, these changes are consistent with Item (ii) of the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14,870 of the April 6, 1983, issue of the Federal Register, and will not result in a significant hazards consideration.

e. PROPOSED CHANGE

Change the Auxiliary Electrical Systems Surveillance Requirements (4.9.B.1) to eliminate excessive testing requirements from diesel generator surveillance when certain offsite power source components are inoperable.

BASIS

The proposed changes to the diesel generator testing requirements are consistent with the diesel manufacturers recommendations to reduce excessive testing and accelerated wear and thereby enhance the reliability of the diesel generators. In lieu of verifying that all of the diesels are operable immediately after declaring an offsite source component inoperable (existing requirement), the diesels would be tested within 24 hours. This is consistent with Generic Letter 84-15. This will provide assurance that no diesel starting problems exist, and will provide additional time for diesel inspection prior to a test. A 24 hour interval will also eliminate abusive quick diesel startups and stops that are presently required to test all of them immediately and will allow the diesels to be operated for at least one hour when started per the diesel manufacturer's recommendations. Any additional testing should not be required as an effort to eliminate accelerated wear of the diesel generators. Therefore, the existing requirement which specifies diesel testing on a rotating basis every 24 hours such that all diesels are tested in three days, has been deleted. Moreover, since diesel failure is not involved when an offsite source is declared inoperable, demonstration of their operability should not be required if they have been successfully tested within the past seven days under routine surveillance. This again will reduce the potential for accelerated wear due to excessive testing of the diesels.

GPC has reviewed the proposed changes and considers them not to involve a significant hazards consideration for the following reasons:

- (1) The proposed changes will not significantly increase the probability or consequences of an accident previously evaluated, because it will eliminate a practice of unnecessary and abusive diesel generator testing contained in the technical specifications. Such testing contributes to accelerated diesel generator wear, which consequently degrades their reliability and availability.

- (2) The proposed changes will not create the possibility of a new or different accident from any accident previously evaluated, because no physical modifications are required to be made to the plant in conjunction with these proposed changes. Therefore, performance of the onsite emergency power system as described in the FSAR remains unchanged.
- (3) The proposed changes will not involve a significant reduction in a margin of safety, because demonstration of diesel generator operability will be maintained, and will be conducted on a more optimum test schedule that will improve the overall performance of the onsite emergency power system.

f. PROPOSED CHANGE

Change the Auxiliary Electrical System Surveillance Requirements (4.9.B.2) to eliminate excessive testing requirements from diesel generator surveillance when one diesel generator is declared inoperable.

BASIS

The proposed changes to the testing requirements are consistent with the diesel manufacturer's recommendations to reduce excessive testing and accelerated wear of the diesel generators and thereby enhance their reliability. In lieu of verifying that the remaining diesels are operable immediately after declaring one of the diesel generators inoperable (existing requirement), the remaining diesels would be tested within 24 hours. This will provide assurance that no starting problems exist, and will provide additional time for inspection prior to a test. A 24 hour interval will also eliminate abusive quick diesel startups and stops that are needed to test all of them immediately and will allow the diesels to be operated for at least one hour when started per the diesel manufacturer's recommendations. Any additional testing should not be required as an effort to eliminate accelerated wear of the diesel generators. Therefore, the existing requirement, which specifies diesel testing on a rotating basis every 24 hours such that both operable diesels are tested in two days, has been deleted. All these changes are consistent with Generic Letter 84-15.

GPC has reviewed the proposed changes and considers them not to involve a significant hazards consideration for the following reasons:

- (1) The proposed changes will not significantly increase the probability or consequences of an accident previously evaluated, because it will eliminate a practice of unnecessary and abusive diesel generator testing contained in the technical specifications. Such testing contributes to accelerated diesel generator wear, which consequently degrades their reliability and availability.
- (2) The proposed changes will not create the possibility of a new or different accident from any accident previously evaluated, because no physical modifications are required to be made to the plant in conjunction with these proposed changes. Therefore, performance of the onsite emergency power system as described in the FSAR remains unchanged.
- (3) The proposed changes will not involve a significant reduction in a margin of safety, because demonstration of diesel generator operability will be maintained, and will be conducted on a more optimum test schedule that will improve the overall performance of the onsite emergency power system.

g. PROPOSED CHANGE

Change the Core and Containment Systems Surveillance Requirements (4.5.G) to eliminate excessive testing requirements when one diesel generator is declared inoperable.

BASIS

The existing testing requirement is redundant to that contained in Specification 4.9.B.2 and should therefore be deleted considering the requirements proposed in item f. above. The proposed changes to the testing requirements are in compliance with the diesel manufacturer's recommendations to reduce excessive testing and accelerated wear, and thereby enhance the reliability of the diesel generators.

GPC has reviewed the proposed changes and considers them not to involve a significant hazards consideration for the following reasons:

- (1) The proposed changes will not significantly increase the probability or consequences of an accident previously evaluated, because it will eliminate a practice of unnecessary and abusive diesel generator testing contained in the technical specifications. Such testing contributes to accelerated diesel generator wear, which consequently degrades their reliability and availability.

- (2) The proposed changes will not create the possibility of a new or different accident from any accident previously evaluated, because no physical modifications are required to be made to the plant in conjunction with these proposed changes. Therefore, performance of the onsite emergency power system as described in the FSAR remains unchanged.
- (3) The proposed changes will not involve a significant reduction in a margin of safety, because demonstration of diesel generator operability will be maintained, and will be conducted on a more optimum test schedule that will improve the overall performance of the onsite emergency power system.

h. PROPOSED CHANGE

Change the Auxiliary Electrical Systems Limiting Conditions for Operation (3.9.B.2) to allow only 72 hours to restore operability to the diesel with a 7-day exception once/year/ diesel for preventive maintenance and two 18-day exceptions per year for the entire plant (i.e., all five emergency diesels) for major repairs.

BASIS

The current technical specifications allow 7-days to restore operability, therefore changing to a 3-day LCO with a 7-day exception once/year/diesel/ and two 18-day exceptions is more conservative. A probabilistic risk assessment study showed that the frequency of core melt was decreased with the proposed LCO. An 18 day LCO was recommended by the diesel generator manufacturer to allow time to repair the emergency diesels in case of a major failure. A shorter time period could result in inadequate investigations and quick repairs that do not correct the actual problem and result in subsequent failures. Repair experience on diesel 2C supports that recommendation.

GPC has reviewed the proposed change and considers it not to involve a significant hazards consideration for the following reasons:

- (1) The proposed change will not significantly increase the probability or consequences of an accident previously evaluated because a probabilistic risk assessment study has shown that the proposed LCO decreases the frequency of core melt.

- (2) The proposed change will not create the possibility of a new or different accident from any accident previously evaluated, because no physical modifications are being made to the plant in conjunction with this change. Therefore the performance of the onsite emergency power system as described in the FSAR remains unchanged.
- (3) The proposed change will not involve a significant reduction in the margin of plant safety because a probabilistic risk assessment study showed that the proposed LOO decreases the frequency of core melt, thereby increasing plant safety.

i. PROPOSED CHANGE

Change the Administrative Controls section (6.9.1.5) to include requiring an annual report of the number of valid tests and the number of failures to start on demand for each diesel generator.

BASIS

This change constitutes an additional requirement not presently included in the Hatch 1 Technical Specifications. GPC has reviewed this proposed change and considers it not to involve a significant hazards consideration, because it represents an additional requirement. Consequently, this change is consistent with Item (ii) of the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14870 of the April 6, 1983, issue of the Federal Register, and will not result in a significant hazards consideration.

NRC DOCKET 50-366
OPERATING LICENSE NPF-5
EDWIN I. HATCH NUCLEAR PLANT UNIT 2
REQUEST TO AMEND TECHNICAL SPECIFICATIONS

Pursuant to 10 CFR 50.92, Georgia Power has evaluated the proposed amendment and has determined that its adoption would not involve a significant hazard. The basis for this determination is as follows:

a. PROPOSED CHANGE

Change the Electrical Power Systems Limiting Condition for Operation (Action Statement 3.8.1.1) to reflect the diesel manufacturer's recommendations for eliminating excessive testing requirements that currently exist with offsite and/or onsite emergency AC power sources inoperable.

BASIS

Hatch 2 Technical Specification 3.8.1.1, Action Statement a., requires that every diesel be tested within one hour and every eight hours thereafter in the event an emergency AC source or offsite power source is declared inoperable. To reduce excess testing and thereby enhancing the reliability of the diesel generators, it is proposed that when an emergency AC source is declared inoperable, the remaining diesels be demonstrated operable within 24 hours. Diesel testing within the first 24 hours will provide assurance that no starting problems exist with the diesels and will provide additional time for inspection prior to the test. A 24 hour interval will also eliminate abusive quick diesel startups and stops that are presently required to test all of them within one hour. Such testing is abusive to the diesel generators since they should each be operated for at least one hour when started per the diesel manufacturer's recommendations. Any additional testing should not be required as an effort to eliminate accelerated wear of the diesel generators. Therefore, the existing requirement which requires testing every eight hours has been deleted. This is consistent with Generic Letter 84-15.

For the specific case when one of the offsite emergency sources is declared inoperable, diesel failure is not involved. Therefore, demonstration of their operability should not be required if they have been successfully tested within the past seven days under routine surveillance. This again will reduce the potential for excessive testing. Moreover, little or no additional reliability assurance is gained from increasing testing beyond that required for routine surveillance.

To accommodate the recommendations described above, the proposed changes to Hatch 2 Technical Specification 3.8.1.1 separate existing

Action Statement a. into two new Action Statements, a. and b. Also, existing Action Statements b., c., and d. are changed to Action Statements c., d., and e., respectively, and are modified to be consistent with the requirements of proposed Action Statements a. and b. In addition, proposed Action Statement e. changed the allowable time from 2 hours to 24 hours to restore one of the two inoperable diesels to operable status. Two hours does not allow enough time to troubleshoot a problem to determine the cause of inoperability. A two hour limiting condition for operation may result in emergency repairs which may not restore full reliability to the diesel. In addition, existing Action Statement c. allows 24 hours to restore one of two inoperable offsite power circuits (preferred source of emergency power) to operable status. Therefore, the diesels should have the same LCO requirement as allowed for offsite power.

GPC has reviewed the proposed changes and considers them not to involve a significant hazards consideration for the following reasons:

- (1) The proposed changes will not significantly increase the probability or consequences of an accident previously evaluated, because it will eliminate a practice of unnecessary and abusive diesel generator testing contained in the technical specifications. Such testing contributes to accelerated diesel generator wear, which consequently degrades their reliability and availability.
- (2) The proposed changes will not create the possibility of a new or different accident from any accident previously evaluated, because no physical modifications are required to be made to the plant in conjunction with these proposed changes. Therefore, performance of the onsite emergency power system as described in the FSAR remains unchanged.
- (3) The proposed changes will not involve a significant reduction in a margin of safety, because demonstration of diesel generator operability will be maintained, and will be conducted on a more optimum test schedule that will improve the overall performance of the onsite emergency power system.

b. PROPOSED CHANGE

Change the Electrical Power Systems Surveillance Requirements (Table 4.8.1.1.2-1) to be consistent with the diesel manufacturer's recommendations regarding the schedule for routine testing of the diesel generators.

BASIS

Hatch 2 Technical Specification 4.8.1.1.2.a implements the testing schedule given in Regulatory Guide 1.108 for routine periodic surveillance testing of the diesel generators. Regulatory Guide 1.108 relates the frequency of testing to the number of test failures on a per nuclear unit basis, i.e. failures totaled from all three diesels. The test intervals vary in four steps proceeding from 31 days, to 14 days, to 7 days, and finally as frequent as 3 days depending on the number of test failures experienced.

A different test schedule is proposed using the general criteria given in Regulatory Guide 1.108 with the exception that routine testing be conducted at intervals of 14 days and 7 days only. The diesel manufacturer has notified GPC that a 31 day test frequency is too long to provide reasonable assurance of the diesels capability to start and provide emergency power, and that testing every three days on a routine basis is too frequent. Frequent testing accelerates wear to the diesels, and will not enhance their reliability.

The proposed test schedule continues to depend upon test failure experience but on a per diesel basis rather than on a per nuclear unit basis. The test schedule should not reflect the idea that failures experienced on a particular diesel would adversely affect the performance of the other diesels. However, the test schedule should reflect individual diesel generator reliability. Therefore, failures on one diesel should not force increased testing of the other diesels. This is consistent with Generic Letter 84-15.

GPC has reviewed the proposed changes and considers them not to involve a significant hazards consideration for the following reasons:

- (1) The proposed changes will not significantly increase the probability or consequences of an accident previously evaluated, because it will eliminate a practice of unnecessary and abusive diesel generator testing contained in the technical specifications. Such testing contributes to accelerated diesel generator wear, which consequently degrades their reliability and availability.
- (2) The proposed changes will not create the possibility of a new or different accident from any accident

previously evaluated, because no physical modifications are required to be made to the plant in conjunction with these proposed changes. Therefore, performance of the onsite emergency power system as described in the FSAR remains unchanged.

- (3) The proposed changes will not involve a significant reduction in a margin of safety, because demonstration of diesel generator operability will be maintained, and will be conducted on a more optimum test schedule that will improve the overall performance of the onsite emergency power system.

c. PROPOSED CHANGE

Change the Electrical Power Systems Surveillance Requirements (Combine 4.8.1.1.2.a.4 and 4.8.1.1.2.a.5 to create proposed Specification 4.8.1.1.2.a.4) to eliminate excessive test requirements when demonstrating diesel operability.

BASIS

The proposed changes to the test requirements are consistent with the diesel manufacturers recommendations to reduce excessive testing and accelerated wear of the diesel generators, and thereby enhance their reliability.

Requiring the diesels to reach synchronous speed in less than or equal to 12 seconds (existing Specification 4.8.1.1.2.a.4) results in abusive quick starts and stops of the diesels when additional surveillance is required by the Action Statements for Specification 3.8.1.1. Requiring the diesels to accept rated loads in less than or equal to 120 seconds (existing Specification 4.8.1.1.2.a.5) also represents a strenuous routine test. The diesel manufacturer recommends that 5 minutes be allowed for the diesels to accept rated loads, thus providing more time for engine preconditioning prior to loading. Therefore, it is proposed that these two test requirements be combined to form one test regardless if it is routine or required by an Action Statement. (Proposed Specification 4.8.1.1.2.a.4.) The existing requirement to load the diesel generators in 120 seconds does not represent a licensing basis for the plant. Therefore, increasing the time to 5 minutes will not compromise plant safety. Moreover, the 18 month surveillance testing requirement for the diesel generators (Specification 4.8.1.1.2.C) verifies the capability of the diesels to function in accordance with design requirements.

GFC has reviewed the proposed changes and considers them not to involve a significant hazards consideration for the following reasons:

- (1) The proposed changes will not significantly increase the probability or consequences of an accident previously evaluated, because it will eliminate a practice of unnecessary and abusive diesel generator testing contained in the technical specifications. Such testing contributes to accelerated diesel generator wear, which consequently degrades their reliability and availability.
- (2) The proposed changes will not create the possibility of a new or different accident from any accident previously evaluated, because no physical modifications are required to be made to the plant in conjunction with these proposed changes. Therefore, performance of the onsite emergency power system as described in the FSAR remains unchanged.
- (3) The proposed changes will not involve a significant reduction in a margin of safety, because demonstration of diesel generator operability will be maintained, and will be conducted in a more optimum manner and on a more optimum test schedule that will improve the overall performance of the onsite emergency power system.

d. PROPOSED CHANGE

Change the Electrical Power Systems Surveillance Requirements (4.8.1.1.2.c.9) to comply with the diesel manufacturer's recommendations regarding overload testing of the diesel generators during the 24 hour 18 month surveillance test.

BASIS

Overload testing of the diesel generators does not contribute to the dependability or the longevity of the equipment, but instead accelerates wear and thereby reduces diesel generator reliability. It may also impede seating or reseating of engine power parts, whether they are new or have been subjected to prior distress. The 24-hour test of the diesel generators currently requires each diesel to be placed in an overload condition during the first two hours and then reduced to its rated loads the following 22 hours. This represents an abusive test requirement for the diesels. The diesel manufacturer has recommended and it is proposed that the 24-hour test be modified to require rated load testing of the diesels during the first 22 hours to allow engine preconditioning, and that the diesels then be subjected to overload operation during the last two hours of the test.

GPC has reviewed the proposed changes and considers them not to involve a significant hazards consideration for the following reasons:

- (1) The proposed changes will not significantly increase the probability of consequences of an accident previously evaluated, because it will eliminate a practice of unnecessary and abusive diesel generator testing contained in the technical specifications. Such testing contributes to accelerated diesel generator wear, which consequently degrades their reliability and availability.
- (2) The proposed changes will not create the possibility of a new or different accident from any accident previously evaluated, because no physical modifications are required to be made to the plant in conjunction with these proposed changes. Therefore, performance of the onsite emergency power system as described in the FSAR remains unchanged.
- (3) The proposed changes will not involve a significant reduction in a margin of safety, because demonstration of diesel generator operability will be maintained, and will be conducted in a more optimum manner that will improve the overall performance of the onsite emergency power system.

e. PROPOSED CHANGE

Change the Electrical Power Systems Surveillance Requirements (4.8.1.1.2.c.14) to reduce the frequency of verifying operability of the diesel air start receivers.

BASIS

Currently, this 18-month surveillance requirement requires five successive starts of the diesels to verify the capability of the air start receivers. It is proposed (Specification 4.8.1.1.2.d) per the diesel manufacturer's recommendation that this test be done only once per five years since the primary reason is to demonstrate adequate equipment sizing of the air start system. Reverification of the performance of the air start receivers will be maintained, but on a reduced time frequency (every five years). As a result, the diesels will be subjected to a significantly reduced number of abusive tests which require quick engine starts and stops, thereby decreasing wear and increasing their reliability.

GPC has reviewed the proposed changes and considers them not to involve a significant hazards consideration for the following reasons:

- (1) The proposed changes will not significantly increase the probability or consequences of an accident previously evaluated, because it will eliminate a practice of unnecessary and abusive diesel generator testing contained in the technical specifications. Such testing contributes to accelerated diesel generator wear, which consequently degrades their reliability and availability.
- (2) The proposed changes will not create the possibility of a new or different accident from any accident previously evaluated, because no physical modifications are required to be made to the plant in conjunction with these proposed changes. Therefore, performance of the onsite emergency power system as described in the FSAR remains unchanged.
- (3) The proposed changes will not involve a significant reduction in a margin of safety, because demonstration of diesel generator operability will be maintained, and will be conducted on a more optimum test schedule that will improve the overall performance of the onsite emergency power system.

f. PROPOSED CHANGE

Change the A.C. Sources Limiting Conditions for Operation (3.8.1.1.b) to add a 7-day exception once/year/diesel for preventive maintenance and two 18-day exceptions per year for the entire plant (i.e., all five emergency diesels) to the 72 hour requirement to return the diesel to operable status.

BASIS

The 7-day proposed exceptions will allow preventive maintenance to be done to a diesel without having to shutdown the plant. The 18-day LCO was recommended by the diesel manufacturer to allow time to repair the emergency diesels in case of a major failure. A shorter time period could result in inadequate investigations and quick repairs that do not correct the actual problem and result in subsequent failures. Repair experience on diesel 2C supports that recommendation. In addition a study using probabilistic risk assessment methodology showed that the proposed LCO does not significantly increase the frequency of core melt.

GPC has reviewed the proposed change and considers it not to involve a significant hazards consideration for the following reasons:

- (1) The proposed change will not significantly increase the probability or consequences of an accident previously evaluated, because a probabilistic risk assessment study showed that the change in core melt frequency is insignificant.
- (2) The proposed change will not create the possibility of a new or different accident from any accident previously evaluated, because no physical modifications are being made to the plant in conjunction with this change. Therefore, the performance of the onsite emergency power system as described in the FSAR remains unchanged.
- (3) The proposed change will not involve a significant reduction in the margin of safety, because a probabilistic risk assessment study showed that the change in core melt frequency is insignificant.

g. PROPOSED CHANGE

Change the Electrical Power Systems - AC Sources Reporting Requirements (4.8.1.1.4) by eliminating the requirements, referencing the Administrative Controls section on annual reports (6.9.1.5) and adding a requirement that an annual diesel reliability data report be submitted to the NRC annually.

BASIS

This change is proposed because Reportable Occurrences section of the Technical Specifications has been superseded by 10 CFR 50.73. In lieu of the current reporting requirement an annual diesel generator reliability data report will be submitted to the NRC in accordance with Generic Letter 84-15. This will allow diesel reliability to be monitored.

Georgia Power this proposed change and considers it not to involve a significant hazards consideration because it represents a change made to conform to changes in the regulations. Consequently, these changes are consistent with Item (vii) of the Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14,870 of the April 6, 1983, issue of the Federal Register, and will not result in a significant hazards conditions.