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Georgia Power
the southern electric system

J. T. Beckham, Jr.
Vice President and General Manager
Nuclear Generation

NED-84-513

November 19, 1984

Director of Nuclear Reactor Regulation
Attention: Mr. John F. Stolz, Chief
Operating Reactors Branch No. 4
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
EDWIN I. HATCH NUCLEAR PLANT UNITS 1, 2
REVISION TO PROPOSED SNUBBER TECHNICAL SPECIFICATIONS

Gentlemen:

By letter dated November 20, 1980, the NRC requested the submittal of revised snubber Technical Specifications. Georgia Power Company (GPC) responded with a submittal dated April 14, 1981. Several revisions to that submittal have been made, the latest of which was dated May 2, 1984. As a result of the issuance of Generic Letter 84-13 on May 3, 1984, and recent discussions between GPC and the NRC staff, a further revision to our proposed Technical Specifications is necessary.

In accordance with the provisions of 10 CFR 50.90 as required by 10 CFR 50.59(c)(1), GPC proposes to amend the Hatch Units 1 and 2 Technical Specifications (Appendix "A" to the Operating Licenses). The proposed changes revise the limiting conditions for operation and surveillance requirements for safety-related hydraulic snubbers and establish such requirements for safety-related mechanical snubbers. The proposed changes supersede those of our May 2, 1984 submittal and differ from those in the earlier submittal as discussed in Enclosure 1. Instructions for incorporation of the changes and the affected Technical Specification pages are included as Enclosures 2 and 3 for Hatch Units 1 and 2, respectively.

The proposed changes have been reviewed and approved by the Plant Review Board and the Safety Review Board and have been determined not to constitute an unreviewed safety question. The probability of occurrence and the consequences of an accident or malfunction of equipment important to safety would not be increased above those analyzed in the FSAR because the operation of safety-related equipment is not affected by the proposed changes. The possibility of an accident or malfunction of a different type

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than any analyzed in the FSAR would not be created by the proposed changes because no new failure mode is introduced. The margin of safety as defined in the basis for any Technical Specification would not be reduced by the changes because operation of the plants would remain within previously analyzed limits. The proposed changes have been evaluated and determined not to involve significant hazards considerations, as discussed in Enclosure 4.

Pursuant to 10 CFR 50.91, J. L. Ledbetter of the Georgia Department of Natural Resources will be sent a copy of this submittal.

Payment of the appropriate licensing fee was made by Check No. 916412, which was included in our April 14, 1981 submittal.

Please contact this office if you have any questions.

J. T. Beckham, Jr. states that he is Vice President of Georgia Power Company and is authorized to execute this oath on behalf of Georgia Power Company, and that to the best of his knowledge and belief the facts set forth in this letter are true.

GEORGIA POWER COMPANY

By: J. T. Beckham, Jr.

Sworn to and subscribed before me this 19th day of November, 1984.

Notary Public, Georgia, State at Large
My Commission Expires Sept. 18, 1987

Notary Public

JH/mb

Enclosure

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

ENCLOSURE 1

NRC DOCKETS 50-321, 50-366
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The changes proposed herein are a revised version of those proposed in GPC's May 2, 1984 submittal. The revisions can be summarized as follows:

1. DELETION OF SNUBBER LISTINGS The Technical Specifications proposed in our May 2, 1984 submittal included snubber listings, in accordance with the NRC Standard Technical Specification. In Generic Letter 84-13, which was issued after our submittal, the NRC stated that deletion of such listings was acceptable provided that the Technical Specification was modified to specify which snubbers were required to be operable. GPC has accordingly deleted the snubber listings and, using the NRC's criterion, specified the snubbers required to be operable. The same snubbers are required to be operable as before the revision. Snubber listings will be maintained in plant procedures.

2. DELETION OF NUMERICAL ACCEPTANCE CRITERIA FOR MECHANICAL SNUBBER DRAG FORCE TESTING Our May 2, 1984 submittal included a requirement for drag force testing of mechanical snubbers. An allowable drag force equal to the greater of 5 lbs or 1% of the snubber's rated load was specified. In a telephone conversation with NRC Region II personnel on September 17, GPC was informed that specific acceptance criteria for drag force need not be included in Technical Specifications. These criteria have been removed. GPC was also informed that a relaxation of the allowable drag force was acceptable to NRC, based on a revision of the drag force specification by the manufacturer of the Hatch snubbers (Pacific Scientific Co.). We are currently investigating the acceptability of snubber drag forces greater than 1% of rated load. The acceptance criteria which will be used in surveillance tests will be specified in plant procedures and will be consistent with manufacturer recommendations and piping stress limitations.

3. INCLUSION OF MECHANICAL SNUBBER ACTIVATION TESTING The Technical Specifications proposed in our May 2, 1984 submittal did not include requirements for activation testing of mechanical snubbers. GPC did not consider this testing necessary because the design of the Hatch mechanical snubbers is such that their restraining action should not change over their expected service lives except in the event of a catastrophic failure. This type of failure would be detected in drag force testing which was included in the proposed Technical Specifications. In the September 17 conversation with NRC Region II, GPC was given no alternative to the inclusion of activation testing in Technical Specifications. While GPC maintains that a drag force test serves as an adequate indication of restraining ability, activation testing has been added to the mechanical snubber surveillance requirements.