Georgia Power Company
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201
Telephone 205 877-7122

C. K. McCoy
Vice President, Nuclear
Vogtle Project

Georgia Power
the southern electric system

February 29, 1996

LCV-0603-J

Docket Nos. 50-424
50-425

Tac Nos. M92131
M92132

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT
PROPOSED CONVERSION OF THE UNIT 1 AND UNIT 2
TECHNICAL SPECIFICATIONS BASED ON NUREG-1431

In preparation for implementation of the improved Technical Specifications (ITS), which is planned to occur between the Spring Unit 1 refueling outage and the Fall Unit 2 refueling outage, Georgia Power Company (GPC) has reviewed the surveillance requirements that will be contained in the ITS. As a result of that review, GPC has identified a limited number of surveillances that will not be current at the time of implementation due to changes in these surveillances resulting from the conversion.

Therefore, GPC requests that the following surveillance requirements (SRs) listed below not be required immediately upon implementation of the Improved TS; they will instead be required in accordance with the provisions stated below:

**Unit 1:**

SR 3.8.4.7 - This SR states that a modified performance discharge test may be performed in lieu of a service test whereas the current Technical Specification (CTS) 4.8.2.1.e, Table 4.8-3, note 2, states that a performance test may be substituted for the service test once per 60-month interval. This SR may not be performed in Modes 1, 2, 3, or 4. For the Unit 1 batteries, until operation under the improved TS begins, the CTS surveillance requirement for battery service tests will be met because the performance test will be performed in lieu of the service test, in accordance with CTS 4.8.2.1.e, Table 4.8-3, note 2. Since the modified



A001 1/0

performance test is a more restrictive test, upon implementation of the ITS, SR 3.8.4.7 would not be met.

Therefore, GPC requests that SR 3.8.4.7 not be required prior to entering Mode 4 until the first startup after the 7th Unit 1 refueling. Thus, the current TS provision that the battery performance test may be performed in lieu of the service test (CTS 4.8.2.1.e, Table 4.8-3, note 2) would be extended to the first entry into Mode 4 following the 7th Unit 1 refueling.

**Unit 2:**

SR 3.8.1.8 - This SR involves verifying that the DGs are capable of withstanding rejection of the single largest post accident load once per 18 months. The CTS version of this SR, 4.8.1.1.2.h.2, does not contain requirements on frequency. Therefore, GPC requests that SR 3.8.1.8 not be required prior to entering Mode 4 until the first startup after the 5th Unit 2 refueling. This relief is requested because of the more restrictive requirements that (1) following load rejection, the frequency is $\leq$ 64.5 hz; and (2) within 3 seconds following load rejection, the frequency is $\geq$ 58.8 hz and $\leq$ 61.2 hz.

SR 3.8.1.9 - This SR verifies that each DG is capable of withstanding a load rejection of $\geq$ 6800 kW and $\leq$ 7000 kW once per 18 months. The CTS version of this SR, 4.8.1.1.2.h.3, does not contain a requirement that the DG be operating at a kVAR load as close as practicable to 3390 kVAR. Therefore, GPC requests that SR 3.8.1.9 not be required prior to entering Mode 4 until the first startup after the 5th Unit 2 refueling. This relief is requested because of the more restrictive requirement in the SR that each DG be operating as close as practicable to 3390 kVAR.

SR 3.8.1.11 - This SR requires verification that the DGs automatically start on a simulated or actual Engineered Safety Feature (ESF) actuation signal. The CTS version of this SR, 4.8.1.1.2.h.5, does not include the acceptance criteria that permanently connected loads remain energized from the offsite power system, and that emergency loads are energized or auto-connected through the automatic load sequencer from the offsite power system. Therefore, GPC requests that SR 3.8.1.11 not be required prior to entering Mode 4 until the first startup after the 5th Unit 2 refueling. This relief is requested because of the more restrictive requirements in the SR that (1) permanently connected loads remain energized from the offsite power system (2) emergency loads are energized or auto-connected through the automatic load sequencer from the offsite power system.

SR 3.8.1.13 - This SR is the 24-hour run of the DGs. The CTS version of this SR, 4.8.1.1.2.h.7, does not contain any criteria related to kVAR loading at the required power levels. Therefore, GPC requests that SR 3.8.1.9 not be required prior to entering Mode 4 until the first startup after the 5th Unit 2 refueling. This relief is requested because of the more restrictive requirements in the SR that each DG be operating (1) as close as practicable

3390 kVAR during operation at ≥ 6800 and ≤ 7000 kW and operating (2) as close as practicable to 3730 kVAR during operation ≥ 7000 and ≤ 7700 kW.

SR 3.8.1.20 - This SR requires both DGs to be started simultaneously and verified to operate within specified voltage and frequency limits. The CTS version of this SR, 4.8.1.1.2.i, does not contain specified voltage and frequency limits. Therefore, GPC requests that SR 3.8.1.20 not be required until the next required performance of this SR. This relief is requested because of the more restrictive requirements that both DGs achieve (1) voltage ≥ 4025 V and ≤ 4330 V; and (2) frequency ≥ 58.8 hz and ≤ 61.2 hz.

Based on the above discussion, GPC requests relief from the aforementioned surveillance requirements.

Sincerely,

C. K. McCoy

CKM/NJS

xc: Georgia Power Company
Mr. J. B. Beasley, Jr.
Mr. M. Sheibani
NORMS

U. S. Nuclear Regulatory Commission
Mr. S. D. Ebneter, Regional Administrator
Mr. L. L. Wheeler, Licensing Project Manager, NRR
Mr. C. R. Ogle, Senior Resident Inspector, Vogtle