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

Mailing Address:
Post Office Box 4545
Atlanta, Georgia 30302

Georgia Power
the southern electric system

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

NED-85-182
1531N

April 4, 1985

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
REQUEST FOR RELIEF FROM ASME SECTION XI CODE REQUIREMENTS

Gentlemen:

As a result of experience in leak rate testing of the Main Steam Isolation Valves (MSIV) at Plant Hatch, Georgia Power Company (GPC) requests relief from the application of some of the requirements of IWV-3427(b) of the 1980 edition of the ASME Section XI Code to the future testing of these valves. The sixteen valves affected by this relief request are Hatch Unit 1 valves 1B21-F022A,B,C,D and 1B21-F028A,B,C,D, and Hatch Unit 2 valves 2B21-F022A,B,C,D and 2B21-F028A,B,C,D. The Code relief, justified herein, provides for testing of the MSIVs using Technical Specification requirements only.

The ASME Section XI Code requires that Category A valves, such as the MSIVs, be tested at least once every 24 months unless a test shows that the margin (between the measured leakage rate and the maximum permissible rate) has been reduced by 50% or greater. If there is a reduction in margin by 50% or greater as discussed above, the frequency of leakage testing should be doubled (i.e., performed approximately every 12 months) and performed to coincide with a cold shutdown. In addition, trending of the leakage rates is required.

Technical Specifications for both Hatch units require that the MSIVs be tested on a more frequent basis than required by the ASME Section XI Code. These 24" air-operated globe valves are tested once per refueling outage by applying pneumatic pressure (28 psig) between the inboard and outboard MSIVs with a maximum allowable leakage of 11.5 standard cubic feet per hour (SCFH) per valve. This allowable leakage is small when compared to other Category A valves. Some leakage may occur through mechanically sound valves because the inboard MSIV is reverse tested, which tends to lift the globe from the valve seat, thereby allowing leakage that would not occur during a normal pressurization.

A048
1/0

Georgia Power

Since the normal testing frequency applied by the Technical Specifications is more frequent than that applied by IWV-3422 of the ASME Section XI Code, it is the opinion of GPC that the the "double test frequency" provision of IWV-3427(b) need not be applied. Using these conservative test criteria, with low allowable leakage at a frequency of once per refueling outage, any significant degradation of the MSIVs should be detected. With fuel cycle lengths extending beyond twelve months, as with the planned eighteen month cycles, a potential exists for unnecessary prolonging of plant cold shutdowns for MSIV testing to meet the "double test frequency" provision of IWV-3427(b) even though the valves meet the Technical Specification leakage requirement. Testing of the MSIVs and any resultant repair(s) brought about by the Code requirements can become the critical path to outage completion. Further, additional testing and/or repair(s) impacts ALARA. Therefore, GPC proposes that these valves be tested each refueling outage using the parameters as defined in the Technical Specifications in lieu of applying the "double test frequency" provision of IWV-3427(b).

Georgia Power Company requests that NRC review this relief request in an expeditious manner so that relief can be granted to accommodate MSIV leakage rate testing during the Hatch Unit 2 maintenance/refueling outage scheduled to begin on April 5, 1985. The staffs of GPC and Southern Company Services, Inc. are available for additional discussion should NRC so desire.

Sincerely yours,

L. T. Gucwa

JAE/MB/mb

xc: J. T. Beckham, Jr.
H. C. Nix, Jr.
J. N. Grace (NRC- Region II)
Senior Resident Inspector