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March 5, 1996

LCV-0603-1

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

By letter dated May 1, 1995, (LCV-0603) Georgia Power Company (GPC) proposed to amend the Vogtle Electric Generating Plant (VEGP) Unit 1 and Unit 2 Technical Specifications (TS). The proposed changes would, in part, convert the existing VEGP TS to the improved TS for Westinghouse plants as represented by NUREG-1431. By letters dated December 21, 1995, (LCV-0603-D) and January 30, 1996, (LCV-0603-E) GPC revised our May 1, 1995, submittal in response to requests for additional information from the NRC staff as well as other issues that were identified subsequent to our May 1, 1995, submittal. Subsequent to our January 30, 1996, submittal, several additional issues have been identified that need to be addressed as described in the following paragraphs.

1. The Completion Times for LCO 3.2.4 Required Actions A.4, A.5, and A.6 need to be revised to reference thermal power as limited by Required Action A.2.2 in addition to Required Action A.1. That is, the Completion Time should read as follows:

"Prior to increasing THERMAL POWER above the limit of Required Action A.1 and A.2.2."

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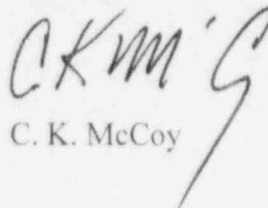
Once Required Action A.1 has been performed, Required Action A.2.1 requires quadrant power tilt ratio (QPTR) to be checked once per 12 hours while Condition A is applicable. If QPTR continues to increase, Required Action A.2.2 requires further reductions in power. Therefore, the Completion Times of Required Actions A.4, A.5, and A.6 should reference the most limiting condition.

2. The LCO discussion for LCO 3.4.7, "RCS Loops - MODE 5, Loops Filled," needs to be revised with respect to the requirements for an operable steam generator. Specifically, the additional requirement that RCS pressure be maintained greater than 100 psig since the most recent filling and venting has been added. This will provide additional assurance that gases will not come out of solution at low RCS pressures so that natural circulation can be initiated and maintained.
3. There is a typographical error on the page identified as "INSERT FOR PAGE B 3.3-53." This page appears in the Bases for LCO 3.3.1 immediately following page B 3.3-53. The equation for axial offset has a minus sign in the denominator that should be a plus sign.
4. In our December 21, 1995, revised submittal, we revised the Bases for SR 3.4.12.1 to state that the safety injection pumps must be rendered incapable of injecting into the RCS through at least two independent means such that a single failure or single action will not result in an injection into the RCS. (This is in lieu of stating that the pump hand switch will be in pull-to-lock and a discharge valve will be closed.) However we failed to revise our Discussion of Change (DOC) 30. The Bases as proposed by our December 21, 1995, submittal states the criteria for rendering the safety injection pumps incapable of injecting into the RCS as opposed to prescribing how that will be accomplished. Our proposed Bases provides the necessary assurance that an inadvertant safety injection via the safety injection pumps will not occur while providing flexibility for meeting this requirement.
5. The definition for the Core Operating Limits Report contains an incorrect reference to Specification 5.9.1.6. The correct reference is Specification 5.6.5. Similarly, the definition for the Pressure Temperature Limits Report references Specification 5.9.1.7 when the correct reference is Specification 5.6.6.

6. In the current submittal, for SR 3.3.1.7 there is a note that SR 3.3.1.7 is "not required to be performed for source range instrumentation prior to entering mode 3 from mode 2 until 4 hours after entry into mode 3". This note provides for mode 3 entry and the attendant source range NI energization on controlled shutdowns prior to requiring the performance of the source range COT. To make the HFASA COT requirements consistent with the source range NI COT requirements, this same note needs to be added to SR 3.3.8.1, HFASA COT. The basis for this change is addressed in RTS discussion of change 63, and the attendant significant hazards evaluation applies to this change.
7. Specification 5.6.6 has been revised at the request of the NRC staff to provide appropriate references for the approval of the Pressure and Temperature Limits Report.
8. Surveillance Requirement 3.5.6.1.c contains an error. The current TS requirement is that the three trisodium phosphate baskets be verified to contain a *total* of between 11,484 pounds (220 cubic feet) and 14,612 pounds (260 cubic feet). Surveillance Requirement 3.5.6.1.c, as it is presently worded, requires that *each basket* be verified to contain $\geq 11,484$ pounds (220 cubic feet) and $\leq 14,612$ pounds (260 cubic feet). Therefore, improved TS SR 3.5.6.1.c needs to be revised to be consistent with the current TS requirement.

Enclosed are marked-up pages, as appropriate, reflecting these changes.

Sincerely,



C. K. McCoy

CKM/NJS

Enclosure

xc: Georgia Power Company
Mr. J. B. Beasley, Jr.
Mr. M. Sheibani
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U. S. Nuclear Regulatory Commission

Mr. S. D. Ebnetter, Regional Administrator
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