Georgia Power Company
Edwin I. Hatch Nuclear Plant
Post Office Box 439
Baxley, Georgia 31513
Telephone 912 367-7781
912 537-9444

J. T. Beckham, Jr.
Vice President

Georgia Power
the southern electric system

HL-2327
003323

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

PLANT HATCH - UNIT 2
NRC DOCKET 50-366
OPERATING LICENSE NPF-5
REQUEST FOR REGIONAL WAIVER OF COMPLIANCE

Gentlemen:

This letter is provided as written follow-up to our verbal request for a regional temporary waiver of compliance for Plant Hatch Unit 2. On July 14, 1992, at approximately 1900 CDT, a one time waiver from the requirements of Technical Specification 3.8.2.3 concerning station battery specific gravity was requested by Georgia Power Company (GPC) and verbally granted by NRC Region II management. The 2A station battery had been declared inoperable at approximately 1315 CDT on 7/14/92, as a result of specific gravity readings less than required. GPC originally requested a 7 day extension of the TS action statement requirement; however, the approved waiver allowed a 3 day extension to the reactor shutdown requirements specified by TS 3.8.2.3 for an inoperable station battery. Following verbal approval of the temporary waiver request, and prior to expiration of the original TS shutdown requirement time limit, the specific gravity of the 2A station battery was restored to an acceptable level. Consequently, the provisions of the temporary waiver of compliance were not implemented. Plant Hatch Unit 2 is currently in full compliance with the original TS requirements for battery operability and the verbally approved waiver of compliance is no longer necessary.

The enclosure to this letter documents the basis for GPC's request for a temporary waiver as discussed in our conference call on the evening of July 14, 1992. Should you have any further questions or concerns regarding this matter, please contact this office at any time.

Sincerely,

J. T. Beckham, Jr.

SJB/ld

Enclosures

cc: See Next Page for Distribution

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cc: Georgia Power Company
Mr. H. L. Sumner, General Manager - Nuclear Plant
NORMS

U.S. Nuclear Regulatory Commission, Washington, D.C.
Mr. K. Jabbour, Licensing Project Manager - Hatch

U.S. Nuclear Regulatory Commission, Region II
Mr. S. D. Ebneter, Regional Administrator
Mr. L. D. Wert, Senior Resident Inspector - Hatch

Enclosure
PLANT HATCH - UNIT 2
NRC DOCKET 50-366
OPERATING LICENSE NPF-5
REQUEST FOR TEMPORARY WAIVER OF COMPLIANCE
ASSOCIATED WITH TECHNICAL SPECIFICATION 3.8.2.3

The following is provided as formal documentation of the discussion among GPC and NRC personnel during a conference call at approximately 1900 CDT on July 14, 1992.

I. Discussion of the requirements for which a Waiver is requested.

Plant Hatch Unit 2 Technical Specification section 3.8.2.3 requires that if an inoperable division of DC power cannot be restored to OPERABLE status within 2 hours, the reactor must be placed in at least HOT SHUTDOWN within the next 12 hours and COLD SHUTDOWN within the following 24 hours. Georgia Power Company requested a temporary waiver of the reactor shutdown requirements associated with the inoperability of the 2A station battery due to less than acceptable specific gravity readings (readings <1.205) for up to 7 days.

II. Discussion of circumstances surrounding the situation including the need for prompt action, and a description of why the situation could not be avoided.

During the performance of the weekly pilot cell surveillance (TS 4.8.2.3.2) for the Unit 2 "A" station service battery on July 14, 1992, the pilot cell for a portion of the 2A station service battery was found to have a specific gravity of approximately 1.190. All other battery surveillance acceptance criteria were met satisfactorily. Since the specific gravity reading was below the Technical Specification requirement of 1.205, the 2A station battery was declared inoperable and the unit entered the 2 hour allowed restoration time at 1315 CDT in accordance with TS 3.8.2.3. The low specific gravity is believed to be attributable to a problem associated with a battery charger experienced on July 13, 1992, when the charger exhibited low output voltage. Upon discovery of the low specific gravity reading, the appropriate battery charger was placed to "equalize". The charging current was initially approximately 9 amps and had decreased to approximately 7.8 amps by about 1630 CDT. Based on this relatively small charging current, the fact that the charging current showed a decrease, and the fact that the other surveillance parameters were acceptable, engineering determined that the battery was sufficiently charged to be considered OPERABLE with respect to its ability to meet its design basis accident load profile requirements. However, batteries of this type characteristically have specific gravity values

that lag the voltage readings and may take from 3 to 7 days to reach the Technical Specification value. Since this is in excess of the shutdown LCO time constraints, relief from the Technical Specification LCO is necessary in order to continue to operate. The specific gravity cannot be increased more quickly than is currently occurring. Additionally, the load demand on the Georgia electrical grid was such that an unnecessary shutdown should be avoided.

III. Discussion of compensatory actions.

The 2A station service battery would remain on equalize charge for the next 7 days (until July 21, 1992) or until the requirements of Unit 2 Technical Specification 4.8.2.3.2.a.2 are met. During this time, the charging current of the battery and the specific gravity of 10% of the affected battery cells (cells 61-120) would be monitored. The battery charging current and specific gravity readings would be taken once a shift. If any charging current reading increased from the previous reading, or any specific gravity reading, corrected for temperature, decreased from the previous reading (within instrument accuracy), an engineering evaluation would be completed within 8 hours. Normal plant monitoring of the battery by operations would continue during the term of the temporary waiver of compliance.

The battery would be maintained on equalize charge until the Technical Specification specific gravity limit of 1.205 was attained. If the Technical Specification limit was not reached within 7 days, appropriate Technical Specification actions would be taken (TS 3.8.2.3 action would be implemented.)

IV. A preliminary evaluation of the safety significance and potential consequences of the proposed request.

GPC believes that the safety significance of the station battery specific gravity being less than that prescribed by the Technical Specifications is very low. The Station Battery 2A was capable of performing its intended safety function and there was no adverse safety impact or increased consequences of failure of malfunction resulting from this Technical Specification waiver based on the following:

- The charging current of the Station Battery 2A indicated that the battery was at least 95% of capacity and was fully capable of carrying design basis accident loads. The specific gravity readings were increasing and approaching their Technical Specification acceptance criteria.

- The de-emphasis of battery specific gravity as a measure of battery capacity was consistent with industry practice as evidenced by the IEEE 450 standard and the new standard Technical Specifications (NUREG 1433). IEEE 450 states, "When the charging current has stabilized at the charging voltage, the battery is charged, even though specific gravities have not stabilized." In addition, the vendor manual states there is a time lag between the battery being fully recharged and specific gravity readings returning to normal. The proposed new standard Tech Specs would allow 7 days for the specific gravity to return to the Technical Specification minimum acceptable value.

- Since the batteries were declared inoperable at approximately 1315 CDT, we had already seen a downward trend in the charging current and an increasing trend in specific gravity readings.

- Battery 2A is approximately 6-7 years old and was at greater than 100% of rated capacity at the last performance test.

V. Discussion which justifies the duration of the request.

Georgia Power Company requested an extension of ACTION statement 3.8.2.3 of the Unit 2 Technical Specifications. IEEE standards suggest that specific gravity readings may not be accurate when the battery is on charge following a discharge. Industry experience has shown that specific gravity can lag behind current for 3 to 7 days following an equalize charge. The proposed standard Technical Specifications recognize this and allow a period of 7 days following an equalize charge before specific gravity readings are required to be taken. Georgia Power Company therefore requested an extension of the ACTION statement for specification 3.8.2.3 of the Unit 2 Tech Specs from "12 hours to Hot Shutdown..." to " 7 days to hot shutdown". If granted, this extension would be effective beginning on July 14, 1992 at 1315 CDT.

VI. The basis for the conclusion that the request does not involve a significant hazards consideration.

GPC has determined that this request for an extension of the requirements of Unit 2 Technical Specifications ACTION statement 3.8.2.3 did not involve a significant hazards consideration for the following reasons:

1) The proposed extension did not involve a significant increase in the probability or consequences of an accident previously evaluated because:

   The station batteries are needed to supply DC loads when the chargers are unavailable during a postulated loss of off-site power event. The proposed extension did not affect any system which supplies off-site power to the plant. The probability of occurrence of a loss of off-site power (LOSP) event was therefore not increased.

   Furthermore, the 2B station battery is fully operable and GPC believed that the 2A battery would be fully functional during the period of the extension, such that, if an LOSP event were to occur, with a corresponding loss of diesel generators, the battery would be fully capable of supplying the 2A DC station service bus. This determination was based on adequate pilot cell voltage, low battery charging current, and adequate overall battery voltage. These parameters would be periodically checked during the extended time period of the ACTION statement. For these reasons, the consequences of an LOSP event were not increased.

2) The proposed extension would not create the possibility of occurrence of a new or different kind of accident from any accident previously evaluated because:

   The proposed extension did not affect any system or piece of equipment whose failure has not been previously considered in the accident analysis. The 2A battery would not be operated outside of its design limits or in any other unanalyzed mode during the extended ACTION statement period. Therefore, the possibility of a new or different kind of accident was not introduced.

3) The proposed extension does not involve a significant reduction in the margin of safety because:

   As previously discussed, the 2A station service battery was fully charged and capable of carrying post-accident DC loads. Battery cell specific gravity is not, by itself, a valid indicator of electrical capability of the battery. Other indicators, such as voltage and charging input current, indicated that the battery was OPERABLE and at least 95% of its full capacity.

   Based on most recent performance testing, station battery 2A has at least 10% capacity margin; therefore, the capability to fully respond to a design basis event was not reduced.

VII. The basis for the conclusion that the request does not involve irreversible environmental consequences.

The requested extension of the ACTION statement would not affect any system discharging radwaste to the environment or monitoring that discharge. It also would not adversely affect any system designed to monitor or isolate gaseous radioactive effluents to the environment. Furthermore, as mentioned previously, the battery was fully functional during the extended period and capable, if necessary, of supplying power to the 2A DC station service bus to assist in mitigating the consequences of an LOSP event. Therefore, no irreversible environmental consequences were involved.

The Plant Review Board has reviewed and concurred with the verbal waiver request.