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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SEP 23 1983

MEMORANDUM FOR: Gus C. Lainas, Assistant Director for Operating Reactors
Division of Licensing

FROM: R. Wayne Houston, Assistant Director for Reactor Safety
Division of Systems Integration

SUBJECT: TECHNICAL SPECIFICATIONS ON THE TURBINE BYPASS SYSTEM
AND THE HIGH WATER LEVEL TRIP AT HATCH UNIT 2

References: 1). Memorandum from W. R. Butler to G. C. Lainas, "Hatch Unit 2
Technical Specification Change," dated January 23, 1983

2). Letter NED-83-303 from J. T. Beckham to the Director, NRR,
dated May 26, 1983

Reference 1 provided our safety evaluation report (SER) on the reload-2 submittal for Hatch Unit 2. We required in the SER that the high water level trip and the turbine bypass systems be included in the plant technical specifications as a condition for acceptability of the transient analyses.

Reference 2 discusses the Georgia Power Company's position that these technical specifications constitute a new, generic requirement, and therefore, require CRGR approval prior to implementation on operating reactors.

We have reviewed the licensee's contention and conclude that the question of technical specifications on the turbine bypass system and the L8 trip system is generic. The requirements for technical specifications on these systems at Hatch Unit 2 may therefore be suspended pending CRGR consideration of the issue.

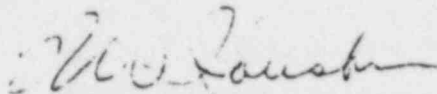
We consider the high water level trip and turbine bypass systems to be, as a minimum, important to safety. Moreover, the licensee has not demonstrated that these two systems should not in fact, be considered safety related. Because of this lack of information and justification provided by the licensee, the Reactor Systems Branch interprets GDC-1 to require, as a minimum, periodic testing of these systems. The systems are considered, at least, important to safety because these systems are assumed operable in transient analyses which define operating and safety limits for the plant; failure of these systems in the analyses would alter the operating and safety limits for the plant.

We do not consider the omission of technical specifications for periodic testing of these systems to pose a safety problem. Failure of these systems in transients for which they have been assumed operable could result in violation of the MCPR safety limit for the plant but would not substantially increase the overall risk to the health and safety of the public. Failure of these systems would have minimal impact on core melt.

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Based on the above arguments, we see no significant safety concern in suspending the technical specification requirements for the high water level trip and turbine bypass systems. We cannot, however, conclude at this time that the transient analyses which define the operating and safety limits for the plant necessarily satisfy the regulations. It remains our position that Hatch Unit 2 should specify technical specifications for the level 8 trip and turbine bypass if they continue to take credit for these systems in safety analyses.

If continued operation is recommended without these technical specifications, we suggest that DL cite the SPEB evaluation that concluded that the risk of operating without these technical specifications was small.



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