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September 25, 1992

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

> PLANT HATCH - UNITS 1, 2 NRC DOCKETS 50-321, 50-366 OPERATING LICENSES DPR-57, NPF-5 RESPONSE TO GENERIC LETTER 92-04

Gent emen:

On August 19, 1992, the NRC issued Generic Letter 92-04, "Resolution of the Issues Related to Reactor Vessel Water Level Instrumentation in BWRs Pursuant to 10 CFR 50.54(f)." The generic letter notified licensees of the NRC's concern that noncondensible gases may become dissolved in the reference leg of BWR water level instrumentation and could potentially lead to a falle high water level indication following a rapid depressurization event. The generic letter further requested licensees to determine the impact of potential level indication errors, notify the NRC of short term actions taken, and provide a plan and schedu's for corrective actions. This information is to be provided to the NRC by September 27, 1992.

Georgia Power Company (GPC) has actively participated with the Boiling Water Reactor Owners' Group (BWROG) to assess the effect of the subject inaccuracies. The enclosure to this letter represents the results of GPC's review of Generic Letter 92-04 and includes responses to the requested actions.

Should you have any questions in this regard, please call this office.

Sincerely,

J. T. Beckham, Jr

JKB/cr

Enclosure

cc: (See next page.)

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Georgia Power

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cc: <u>Georgia Power Company</u> 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 PLANT HATCH - UNITS 1, 2 NRC DOCKETS 50-321, 50-366 OPERATING LICENSES DPR-57, NPF-5 RESPONSE TO GENERIC LETTER 92-04

NRC Requested Action 1

- In light of potential errors resulting from the effects of noncondensible gas, each licensee should determine:
 - A. The impact of potential level indication errors on automatic safety system response during all licensing basis transients and accidents;
 - B. The impact of potential level indication errors on operator's short and long term actions during and after all licensing basis accidents and transients;
 - C. The impact of potential level indication errors on operator actions prescribed in emergency operating procedures or other affected procedures not covered in (8).

CPC Response

- 1.A On August 28, 1992, the Boiling Water Reactor Owners' Group (3WROG) submitted GENE-770-15-0692, "BWR Reactor Vessel Water Level Instrumentation, Revision 1," to the NRC. This report addresses the safety impact of potential water level indication errors c automatic system response during all licensing basis transients and accidents. This analysis basis is contained in Section 5.0, Safety Analysis, of the report and is summarized in Section 2.2, Plant Responses to Postulated Accident Scenarios. It is GPC's position that the information in the BWROG report is applicable to the design of Plant Hatch. This conclusion is based on our review of the report and the evaluation made by General Electric as contained in Attachment 2 to the report. GPC recognizes that there are differences between the designs of BWR plants and systems; however, our review of the report and the Attachment 2 conclusions reinforce GPC's position that the basic plant response to the design basis transients and accident events is sufficiently similar to obviate the need for additional plant unique detailed re-analysis.
- 1.B The BWROG report addresses, in Section 6.9, Operator Responses, the operator actions that could be anticipated in response to potential water level indication errors. In the short term, the report discusses in Section 6.0 that the automatic safety actions will be performed as necessary. Additional guidance has been provided to the plant operations personner. The interim guidance information has sensitized the operators to the possible concerns with accurate water level readings following a

ENCLOSURE (Continued)

RESPONSE TO GENERIC LETTER 92-04

rapid depressurization while not necessitating a change to the existing long term guidance provided in the Emergancy Operating Procedures (EOPs). Departmental Directive D-92-23 was issued to provide this guidance. As stated in the BWROG report in Section 6.4.1, there have not been any identified rapid depressurization events such as initiation of the Automatic Depressurization System (ADS); therefore, there is an extremely small likelihood of such a challenging event. Additionally, procedures are presently available for backfilling the reference legs of water level instrumentation. These procedures are available to assure the recovery of any instrumentation that may have lost water level indication.

1.C As stated in Section 6.9 of the BWROG report and the 1.B. response above, the operators have adequate information in the present EOPs as augmented by the recent Departmental Directive. The BWROG is continuing to review the potential need for any additional guidance to the Emergency Procedure Guidelines (EPGs; to further address the potential water level indication errors. GPC will closely monitor this BWROG activity.

NRC Requested Action 2.

- Based upon the results of (1), above, each licensee should notify the NRC of short term actions taken, such as:
 - A. Periodic monitoring of level instrumentation system leakage; and,
 - B. Implementation of procedures and operator training to assure that potential level errors will not result in improper operator actions.

GPC Response

2.A Plant Hatch Unit 2 was shut down for a scheduled refueling outage on September 16, 1992. Water level trend data have been collected and reviewed during the subsequent depressurization. While water level variations were noted during the transient, there were no apparent anomalies, (i.e., notching) identified by this review.

A walkdown has been performed on the instrument panels and reference leg tubing outside of the containment. No visible leakage was identified. Unit 2 containment piping will be walked down during the present refueling outage; Unit 1 containment piping will be walked down during the next outage of sufficient duration. No leaks are expected to be identified since all connections are welded.

ENCLOSURE (Continued)

RESPONSE TO GENERIC LETTER 92-04

Each channel of water level indication is checked once per shift to ensure that any mismatch is within procedural acceptance criteria. If channel level difference is beyond that range, the unit Shift Supervisor reviews the difference for appropriate action.

2.B The potential effects of rapid depressurization on reactor water level indication has been communicated to plant operators. As stated in the response to 1.B, training has been provided to the operators, and the EOPs are adequate to ensure that potential level errors will not result in improper operator actions.

NRC Requested Action 3

3. Each licensee insuld provide its plans and schedule for corrective actions, including any proposed hardware modifications necessary to ensure the level instrumentation system design is of high functional reliability for long term operation. Since this instrumentation plays an important role in plant safety and is required for both normal and accident conditions, the staff recommends that each utility implement its longer term actions to assure a level instrumentation system of high functional reliability at the first opportunity but prior to starting up after the next refueling outage commencing 3 months after the date of this letter.

GPC Response

GPC is contemplating hardware modifications similar to, but not identical to, modifications installed at the Millstone facility. These modifications will ensure the level instrumentation system provides a high functional reliability and will preclude any concerns related to noncondensible buildup in the reference legs. GPC currently plans to install these modifications prior to startup from the Spring 1993 refueling outage on Unit 1 and the Spring 1994 refueling outage on Unit 2. However, GPC is in the process of evaluating the potential modifications in light of the proposed BWROG testing program. Consequently, GPC's plan and schedule to install hardware modifications are contingent upon the outcome of these evaluations.

Should a change in the plan and schedule described above occur, the NRC will be promptly notified.