

Georgia Power Company
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201
Telephone 205 877-7279

J. T. Beckham, Jr.
Vice President - Nuclear
Hatch Project



Georgia Power

the southern electric system

HL-2923
004032

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

Gentlemen:

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 noncondensable gases may become dissolved in the reference leg of BWR water level instrumentation and could potentially lead to a false 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 schedule 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.)

28-079

9209300217 920925
PDR ADOCK 05000321
P PDR

Aool
1/1

U.S. Nuclear Regulatory Commission
September 25, 1992
Page Two

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. Ebnetter, Regional Administrator
Mr. L. D. Wert, Senior Resident Inspector - Hatch

ENCLOSURE
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

1. In light of potential errors resulting from the effects of noncondensable 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 (B).

OPC Response

- 1.A On August 28, 1992, the Boiling Water Reactor Owners' Group (BWROG) 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 on 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 personnel. 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 Emergency Operating Procedures (EOPs). Departmental Directive 0-92-23 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.

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.

