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Georgia Power
the southern electric system

L. T. Gucwa
Manager Nuclear Engineering
and Chief Nuclear Engineer

NED-84-550
1145N

October 19, 1984

Director of Nuclear Reactor Regulation
Attention: Mr. John F. Stolz, Chief
Operating Reactors Branch No. 4
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

NRC DOCKET 50-321
OPERATING LICENSE DPR-57
EDWIN I. HATCH NUCLEAR PLANT UNIT 1
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
EQUIPMENT QUALIFICATION PROGRAM DEADLINE EXTENSIONS

Gentlemen:

By letter dated October 12, 1984, the NRC staff requested certain additional information for use in the review of equipment qualification deadline extension requests submitted by Georgia Power Company (GPC). The staff requested that this information be submitted by October 19, 1984.

Each of the four items of information requested by the above-referenced NRC letter, followed by the GPC response to each item, are presented below:

NRC Item No. 1

Your best estimate regarding the time necessary to complete the installation of all equipment currently qualified and available, based on an extension of the fall 1984 outage.

GPC Response to Item No. 1

GPC estimates that with a few exceptions, installation (i.e., placing into service) of all replacement equipment on the Unit 1 master list for which replacement is required under 10 CFR 50.49, would require an outage of approximately 21 weeks duration. In addition to equipment associated with the Hydrogen and Oxygen Analyzer System which has been addressed in previous correspondence, we have recently identified that components E11-N002 A,B (i.e., differential pressure transmitters) were received with an incorrect range. These differential pressure transmitters have been returned to the factory and may not be returned in time for installation during the present outage. A listing of those items which are not currently qualified or available, for which GPC still requests an extension of the qualification deadline to November 30, 1985 is contained in Enclosure 1 to this submittal.

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NRC Item No. 2

The feasibility of completing the installation of a substantial number of the items for which you have requested extensions, based on an extension of the current outage, if the installation of certain equipment would require significant delay.

GPC Response to Item No. 2

GPC has determined that as alternatives to the installation plan outlined in the above response to Item No. 1, the following three other partial installation plans would be feasible:

a) Option A: This option describes the scope of installation activities previously scheduled by GPC during the present outage. In addition, subsequent to our September 11, 1984 letter describing this scope, a few additional ATTS instruments are now included in the scope of Option A due to a physical relocation of instrument panels. Installation of one of the instruments will require a change to the Technical Specifications. A separate letter is being submitted on this subject. This plan would require an outage of approximately 10 weeks. Deadline extensions to November 30, 1985 would be required for the items listed in Enclosure 2 to this letter.

b) Option B: This plan would include installation of all items in Option A above, as well as a number of additional equipment items. Deadline extension to November 30, 1985 would be needed for all items listed in Enclosure 3 to this submittal. This plan would result in an estimated outage length of approximately 15 weeks and would result in the installation of approximately one-fourth of those items for which schedular relief has been requested .

c) Option C: This plan includes installation of all items covered by both Options A and B above, along with a number of additional items. The few items which would require an extension to November 30, 1985 are listed in Enclousre 4 to this submittal. This plan would require approximately 18 weeks of plant outage time to complete and would result in the installation of approximately two-thirds of those items for which schedular relief has been requested.

NRC Item No. 3

The feasibility of installing this equipment during operation of Unit 1.

GPC Response to Item No. 3

GPC has determined that replacement of more than a very few of the required items during Unit 1 operation could severely impact plant operability and could significantly impact plant safety and reliability. Further, some equipment installation requires work in areas normally inaccessible during plant operation, due to radiation levels. Installation of the few items with the plant operating for which this option is feasible would not significantly reduce any of the estimated outage lengths given in the responses to Items No. 1 and No. 2 above. Therefore, GPC has determined that equipment installation with the plant operating (outside of the preliminary activities which have already been performed) is not a satisfactory method for use in completing any significant portion of the qualification program.

NRC Item No. 4

Confirmation that all previously-submitted justifications for continued operation (JCOs) demonstrate that assumed equipment failures will not significantly degrade any safety function or mislead the operator.

GPC Response to Item No. 4

GPC has previously submitted JCOs for all but one of the outstanding Unit 1 equipment qualification items by letters dated July 24, 1984 and September 26, 1984 (NED-84-393 and 508, respectively). The JCO for Item E41-C002 (SV1), which appears at the bottom of page 1 of Enclosure 2, was submitted prior to the two letters noted above, and is being resubmitted here for completion (Enclosure 5).

As noted above, we are currently proceeding with Option A. This plan contains a scope of work activities estimated to be possible during an outage of approximately 10 weeks. If the outage which began on September 29, 1984, is extended due to other factors, GPC will endeavor to complete additional environmental qualification program related installation activities commensurate with the expected outage end date.

Georgia Power

Pursuant to the requirements of 10 CFR 50.92, J. L. Ledbetter of the Georgia Department of Natural Resources will be sent a copy of this letter and all applicable attachments.

I, L. T. Gucwa, state that I am Manager Nuclear Engineering & Chief Nuclear Engineer and to the best of my knowledge and belief the facts set forth in this letter are true.

GEORGIA POWER COMPANY

By: L T Gucwa
L. T. Gucwa

Sworn to and subscribed before me this 19th day of October, 1984.

Mae H. Battle
Notary Public

Notary Public, Georgia, State at Large
My Commission Expires Sept. 18, 1987

CBS/mb
Enclosures

xc: J. T. Beckham, Jr.
H. C. Nix, Jr.
Senior Resident Inspector
J. P. O'Reilly, (NRC-Region II)
J. L. Ledbetter

Georgia Power

ENCLOSURE 1

NRC DOCKET 50-321
OPERATING LICENSE DPR-57
EDWIN I. HATCH NUCLEAR PLANT UNIT 1
ITEMS WHICH ARE NOT CURRENTLY QUALIFIED
OR AVAILABLE FOR INSTALLATION

GPC requests that the 10 CFR 50.49(g) qualification deadline be extended to November 30, 1985, for the following equipment items:

Plant MPL Number	Equipment Description
E11-N002A,B	Differential Pressure Transmitter
P33-P001A,B	Hydrogen and Oxygen Analyzer System
R11-S039	Transformer*
R11-S040	Transformer*
R24-S011	Panelboard*
R24-S012	Panelboard*

*Equipment associated with the Hydrogen and Oxygen Analyzer System

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ENCLOSURE 2
(page 1 of 3)

NRC DOCKET 50-321
OPERATING LICENSE DPR-57
EDWIN I. HATCH NUCLEAR PLANT UNIT 1
EQUIPMENT QUALIFICATION PROGRAM DEADLINE
EXTENSION REQUEST FOR OPTION A OUTAGE SCOPE

GPC requests that the 10 CFR 50.49(g) qualification deadline be extended to November 30, 1985, for the following equipment items:

Plant MPL Number	Equipment Description
B21-F019	Motorized Valve Operator
B21-N006A,B,C,D	Differential Pressure Indicating Switch
B21-N007A,B,C,D	Differential Pressure Indicating Switch
B21-N008A,B,C,D	Differential Pressure Indicating Switch
B21-N009A,B,C,D	Differential Pressure Indicating Switch
B21-N010A,B,C,D	Temperature Switch
B21-N011A,B,C,D	Temperature Switch
B21-N012A,B,C,D	Temperature Switch
B21-N013A,B,C,D	Temperature Switch
B21-N036	Level Indicating Transmitter Switch
B21-N037	Level Indicating Transmitter Switch
B31-F031A,B	Motorized Valve Operator
C71-N002A,B,C,D	Pressure Switch
E11-F004D	Motorized Valve Operator
E11-F008	Motorized Valve Operator
E11-F009	Motorized Valve Operator
E11-F021A,B	Motorized Valve Operator
E11-F022	Motorized Valve Operator
E11-F075A	Motorized Valve Operator
E11-N002A,B	Differential Pressure Transmitter
E11-N010A,B,C,D	Pressure Switch
E11-N011A,B,C,D	Pressure Switch
E11-N015A,B	Flow Transmitter
E11-N016A,B,C,D	Pressure Switch
E11-N020A,B,C,D	Pressure Switch
E11-N021A,B	Differential Pressure Indicating Switch
E41-C002(SV1)	Solenoid Valve

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EQUIPMENT QUALIFICATION PROGRAM DEADLINE
EXTENSION REQUEST FOR OPTION A OUTAGE SCOPE

Plant MPL Number	Equipment Description
E21-F004A,B	Motorized Valve Operator
E21-F005A,B	Motorized Valve Operator
E21-N003A,B	Flow Transmitter
E21-N006A,B	Flow Indicating Switch
E21-N008A,B	Pressure Switch
E21-N009A,B	Pressure Switch
E41-C002(LS-4)	Limit Switch
E41-F001	Motorized Valve Operator
E41-F003	Motorized Valve Operator
E41-F006	Motorized Valve Operator
E41-F007	Motorized Valve Operator
E41-F011	Motorized Valve Operator
E41-F012	Motorized Valve Operator
E41-F041	Motorized Valve Operator
E41-N006	Flow Switch
E41-N008	Flow Transmitter
E41-N010	Pressure Switch
E41-N012A,B,C,D	Pressure Switch
E41-N015A,B	Level Switch
E41-N017A,B	Pressure Switch
E41-N027	Pressure Switch
E41-N030A,B	Temperature Element
E41-N046A,B	Temperature Element
E51-F008	Motorized Valve Operator
E51-F031	Motorized Valve Operator
E51-N012A,B,C,D	Pressure Switch
E51-N017	Differential Pressure Indicating Switch
E51-N018	Differential Pressure Indicating Switch
E51-N019A,B,C,D	Pressure Switch
E51-N023A,B	Temperature Element
E51-N025A,B,C,D	Temperature Element
E51-N026A,B,C,D	Temperature Element
E51-N027A,B,C,D	Temperature Element

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EQUIPMENT QUALIFICATION PROGRAM DEADLINE
EXTENSION REQUEST FOR OPTION A OUTAGE SCOPE

Plant MPL Number	Equipment Description
G31-F001	Motorized Valve Operator
G31-N012	Flow Transmitter
G31-N016A,B,C,D,E,F	Temperature Element
G31-N022A,B,C,D,E,F	Temperature Element
G31-N023A,B,C,D,E,F	Temperature Element
G31-N036	Flow Transmitter
G31-N041	Flow Transmitter
P33-P001A,B	Hydrogen and Oxygen Analyzer System
P52-F875	Motorized Valve Operator
P52-N021	Pressure Indicating Switch
R11-S039	Transformer*
R11-S040	Transformer*
R24-S011	Panelboard*
R24-S012	Panelboard*
T41-N019A,B	Temperature Indicating Switch
T41-N020A,B	Temperature Indicating Switch
T41-N021A,B	Temperature Indicating Switch
T47-N003	Temperature Element
T47-N009	Temperature Element
T48-F112A,B	Hydraulic Valve Operator
T48-K001	Power Supply
T48-K011A,B	Power Supply
T48-N001	Pressure Transmitter
T48-N009A,B,C,D	Temperature Element
T48-N014A,B	Flow Transmitter
T48-N021A,B	Level Transmitter
T48-N210	Differential Pressure Switch
T48-N211	Differential Pressure Switch
N3-04	Hypalon Jacketed Cable
N3-19	PVC Jacketed Cable

*Equipment associated with the Hydrogen and Oxygen Analyzer System

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Georgia Power

ENCLOSURE 3
(page 1 of 2)

NRC DOCKET 50-321
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EDWIN I. HATCH NUCLEAR PLANT UNIT 1
EQUIPMENT QUALIFICATION PROGRAM DEADLINE
EXTENSION REQUEST FOR OPTION B OUTAGE SCOPE

GPC requests that the 10 CFR 50.49(g) qualification deadline be extended to November 30, 1985, for the following equipment items:

Plant MPL Number	Equipment Description
B21-N006A,B,C,D	Differential Pressure Indicating Switch
B21-N007A,B,C,D	Differential Pressure Indicating Switch
B21-N008A,B,C,D	Differential Pressure Indicating Switch
B21-N009A,B,C,D	Differential Pressure Indicating Switch
B21-N010A,B,C,D	Temperature Switch
B21-N011A,B,C,D	Temperature Switch
B21-N012A,B,C,D	Temperature Switch
B21-N013A,B,C,D	Temperature Switch
B21-N036	Level Indicating Transmitter Switch
B21-N037	Level Indicating Transmitter Switch
C71-N002A,B,C,D	Pressure Switch
E11-N002A,B	Differential Pressure Transmitter
E11-N010A,B,C,D	Pressure Switch
E11-N011A,B,C,D	Pressure Switch
E11-N015A,B	Flow Transmitter
E11-N016A,B,C,D	Pressure Switch
E11-N020A,B,C,D	Pressure Switch
E11-N021A,B	Differential Pressure Indicating Switch
E21-N003A,B	Flow Transmitter
E21-N006A,B	Flow Indicating Switch
E21-N008A,B	Pressure Switch
E21-N009A,B	Pressure Switch
E41-N006	Flow Switch
E41-N008	Flow Transmitter
E41-N010	Pressure Switch
E41-N012A,B,C,D	Pressure Switch
E41-N015A,B	Level Switch
E41-N017A,B	Pressure Switch
E41-N027	Pressure Switch
E41-N030A,B	Temperature Element
E41-N046A,B	Temperature Element

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ENCLOSURE 3
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EDWIN I. HATCH NUCLEAR PLANT UNIT 1
EQUIPMENT QUALIFICATION PROGRAM DEADLINE
EXTENSION REQUEST FOR OPTION B OUTAGE SCOPE

Plant MPL Number	Equipment Description
E51-N012A,B,C,D	Pressure Switch
E51-N017	Differential Pressure Indicating Switch
E51-N018	Differential Pressure Indicating Switch
E51-N019A,B,C,D	Pressure Switch
E51-N023A,B	Temperature Element
E51-N025A,B,C,D	Temperature Element
E51-N026A,B,C,D	Temperature Element
E51-N027A,B,C,D	Temperature Element
G31-N012	Flow Transmitter
G31-N016A,B,C,D,E,F	Temperature Element
G31-N022A,B,C,D,E,F	Temperature Element
G31-N023A,B,C,D,E,F	Temperature Element
G31-N036	Flow Transmitter
G31-N041	Flow Transmitter
P33-P001A,B	Hydrogen and Oxygen Analyzer System
P52-F875	Motorized Valve Operator
R11-S039	Transformer*
R11-S040	Transformer*
R24-S011	Panelboard*
R24-S012	Panelboard*
T41-N019A,B	Temperature Indicating Switch
T41-N020A,B	Temperature Indicating Switch
T41-N021A,B	Temperature Indicating Switch

*Equipment associated with the Hydrogen and Oxygen Analyzer System

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ENCLOSURE 4
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NRC DOCKET 50-321
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EDWIN I. HATCH NUCLEAR PLANT UNIT 1
EQUIPMENT QUALIFICATION PROGRAM DEADLINE
EXTENSION REQUEST FOR OPTION C OUTAGE SCOPE

GPC requests that the 10 CFR 50.49(g) qualification deadline be extended to November 30, 1985, for the following equipment items:

Plant MPL Number	Equipment Description
B21-N010A,B,C,D	Temperature Switch
B21-N011A,B,C,D	Temperature Switch
B21-N012A,B,C,D	Temperature Switch
B21-N013A,B,C,D	Temperature Switch
E11-N002A,B	Differential Pressure Transmitter
E41-N030A,B	Temperature Element
E41-N046A,B	Temperature Element
E51-N023A,B	Temperature Element
E51-N025A,B,C,D	Temperature Element
E51-N026A,B,C,D	Temperature Element
E51-N027A,B,C,D	Temperature Element
G31-N016A,B,C,D,E,F	Temperature Element
G31-N022A,B,C,D,E,F	Temperature Element
G31-N023A,B,C,D,E,F	Temperature Element
P33-P001A,B	Hydrogen and Oxygen Analyzer System
P52-F875	Motorized Valve Operator
R11-S039	Transformer*
R11-S040	Transformer*
R24-S011	Panelboard*
R24-S012	Panelboard*
T41-N019A,B	Temperature Indicating Switch
T41-N020A,B	Temperature Indicating Switch
T41-N021A,B	Temperature Indicating Switch

*Equipment associated with the Hydrogen and Oxygen Analyzer System

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Georgia Power

ENCLOSURE 5

NRC DOCKET 50-321
OPERATING LICENSE DPR-57
EDWIN I. HATCH NUCLEAR PLANT UNIT 1
EQUIPMENT QUALIFICATION PROGRAM DEADLINE
EXTENSION REQUEST - JCO FOR E41-C002 (SV1)

The attached justification for continued operation provides the basis for continued operation in support of item E41-C002 (SV1) and replaces the page 46 previously submitted.

October 19, 1984

ATTACHMENT 2

E41-C002

E41-C002 is the HPCI Turbine and auxiliaries [including E41-C002(SV1)].

The HPCI Turbine could be subjected to a harsh environment due to temperature after a HPCI steam line break, but no credit is taken for the operation of the HPCI Turbine following a rupture of its steam supply line.

In the event of a large break LOCA for which the HPCI system cannot maintain RPV level, the Turbine may be subjected to high radiation. However, in this case the HPCI System is not required since the PRV will be depressurized by the break and/or the actuation of the ADS System. Adequate core cooling is then provided by the low pressure ECCS systems.

In the event of a small break LOCA for which the HPCI can maintain RPV level, the core never uncovers and hence core cooling is maintained and the radiation environment is not present.

This piece of equipment has been used during normal operation in plants similar to Hatch 1 for the past eleven (11) years. To date, no age related common mode failures have been reported. These devices have experienced relatively limited service in Hatch 1 as they have been used during normal operation for only five (5) years. With this limited service this equipment is not expected to fail before replacement.

Based on the above, continued operation is justified.