Georgia Power Company
333 Piedmont Avenue
Atlanta, Georgia 30308
Telephone 404 526-7020

Mailing Address:
Post Office Box 4545
Atlanta, Georgia 30302

Georgia Power
the southern electric system

J. T. Beckham, Jr.
Vice President and General Manager
Nuclear Operations

NED-85-056
0345y

February 15, 1985

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 50-366
OPERATING LICENSE NPF-5
EDWIN I. HATCH NUCLEAR PLANT UNIT 2
HCU LOW PRESSURE ALARM SETPOINT AND ADS TIMER MPL NUMBER REVISION

Gentlemen:

In accordance with the provisions of 10 CFR 50.90 as required by 10 CFR 50.59(c)(1), Georgia Power Company hereby proposes changes to the Technical Specifications, Appendix A to Operating License NPF-5.

Two changes are proposed. The first proposed change is a revision to the Hydraulic Control Unit (HCU) pressure alarm setpoint and tolerance as required for a CHANNEL CALIBRATION per Technical Specification 4.1.3.5.b.2. This specification currently requires that the HCU pressure detectors be calibrated to alarm at 955 $\pm$ 15 psig. Operating experience has shown that due to temperature induced drift, this narrow tolerance (plus or minus approximately 1.5 percent) cannot be reasonably met. The result is a recurring failure of HCUs to meet the OPERABILITY requirements of Technical Specification 4.1.3.5.a. when tested. In order to resolve this problem, we propose to change the HCU pressure alarm setpoint Technical Specification requirement to $\geq$ 940 psig. The purpose of the HCU pressure alarm is to warn of a decreasing HCU pressure condition while preserving enough HCU pressure to meet scram time requirements for the associated control rod when reactor pressure is low. The lower limit of the tolerance band is the important limit that is preserved by the CHANNEL CALIBRATION. This limit, 940 psig, is unaffected by the proposed change.

A001
1/1

Rec'd w/check #150.00
#968813

The Plant Review Board and the Safety Review Board have reviewed this proposed change and determined that it does not involve an unreviewed safety question. Probabilities and consequences of analyzed accidents will not be increased by this change since the minimum HCU alarm pressure setting is unchanged. No new accident types are created since no new modes of operation are involved. The margin of safety as defined in the Technical Specifications will not be reduced by this change, since it will allow the pressure alarms to be set at a value which reduces the likelihood of instrument drift compromising the lower limit of 940 psig.

The second proposed change is the revision of Table 3.3.3-1, "Emergency Core Cooling System Actuation Instrumentation," to reflect a new Master Parts List (MPL) number for the ADS timer, previously 2B21-K5 A, B. The ADS timer function has been assigned to a new type relay in accordance with General Electric recommendations contained in Service Information Letter (SIL) 230. Relay 2B21-K5 A, B continues to be used for the alarm function, so a new MPL number, 2B21-K752 A, B, has been assigned to the ADS timer. This change is purely a change in nomenclature and does not reflect any change in plant operation or setpoints.

The Plant Review Board and Safety Review Board have reviewed this proposed change and determined that it does not involve an unreviewed safety question. Probabilities and consequences of analyzed accidents are unaffected. No changes in plant operation are involved. The margin of safety as defined in the Technical Specifications is unaffected.

Enclosures 1 and 2 detail the analyses of No Significant Hazards for the proposed changes.

Payment of application fees is enclosed.

In order to allow time for procedure revision and orderly incorporation into copies of the Technical Specifications, we request that the proposed amendment, once approved by the NRC, be issued with an effective date to be no later than 30 days from the date of issuance of the amendment.

Pursuant to the requirements of 10 CFR 50.91, Mr. J. L. Ledbetter of the Environmental Protection Division of the Georgia Department of Natural Resources will be sent a copy of this letter and all applicable attachments.

Georgia Power

J. T. Beckham, Jr. states that he is Vice President of Georgia Power Company and is authorized to execute this oath on behalf of Georgia Power Company, and that to the best of his knowledge and belief the facts set forth in this letter are true.

GEORGIA POWER COMPANY

By: J. T. Beckham, Jr.

Sworn to and subscribed before me this 15th day of February, 1985.

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

Notary Public

REB/
Enclosures

xc: H. C. Nix, Jr.
Senior Resident Inspector
J. P. O'Reilly, (NRC-Region II)
J. L. Ledbetter

Georgia Power

ENCLOSURE 1

NRC DOCKET 50-366
OPERATING LICENSE NPF-5
EDWIN I. HATCH NUCLEAR PLANT UNIT 2
REVISION TO HCU ACCUMULATOR PRESSURE ALARM SETPOINT RANGE

Pursuant to 10 CFR 50.92, Georgia Power Company has evaluated the attached proposed amendment for Plant Hatch Unit 2 and has determined that its adoption would not involve a significant hazard. The basis for this determination is as follows:

PROPOSED CHANGE

Revise the HCU accumulator pressure alarm setpoint range from 955 $\pm$ 15 psig to $\geq$940 psig.

BASIS

This change does not increase the probability or consequences of an accident or malfunction analyzed in the FSAR. As described in Section 4.2.3.2.2.3 of the Hatch Unit 2 FSAR, the purpose of the HCU accumulator is to provide sufficient energy to fully insert a control rod at lower reactor pressures. (At normal operating reactor pressure, reactor pressure alone is sufficient to insert a rod.) Under normal operating conditions, the accumulator piston is seated at the bottom of its cylinder due to pressurization of the water above the piston by the CRD pump. Should an accumulator fail to hold pressure, the nitrogen volume under the piston will expand to the point where sufficient energy is no longer available for the HCU to insert a control rod within time requirements at low reactor pressure. The purpose of the HCU pressure alarm is to warn of this condition while still preserving enough energy to scram the associated control rod. Changing the alarm setpoint from 955 $\pm$ 15 to $\geq$940 psig allows the actual alarm setpoint to be moved in a conservative (upward) direction without violating Technical Specifications. This change does not create the possibility of an accident or malfunction of a different type than analyzed in the FSAR, since no new modes of operation are involved. The margin of safety as defined in the Technical Specifications is not decreased by this change.

Georgia Power

ENCLOSURE 2

NRC DOCKET 50-366
OPERATING LICENSE NPF-5
EDWIN I. HATCH NUCLEAR PLANT UNIT 2
CORRECTION OF TABLE 3.3.3-1 TO REFLECT NEW MPL NUMBER

Pursuant to 10 CFR 50.92, Georgia Power Company has evaluated the attached proposed amendment for Plant Hatch Unit 2 and has determined that its adoption would not involve a significant hazard. The basis for this determination is as follows:

PROPOSED CHANGE

Revise Table 3.3.3-1 to reflect a new MPL number for the ADS timer relay.

BASIS

The proposed change only involves a change in nomenclature. No change to plant operation is involved. Therefore, this change is consistent with Item (i) of the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations" listed on page 14,870 of the Federal Register, April 6, 1983.

ENCLOSURE 3

NRC DOCKET 50-366
OPERATING LICENSE NPF-5
EDWIN I. HATCH NUCLEAR PLANT UNIT 2
PROPOSED CHANGE TO TECHNICAL SPECIFICATIONS

The proposed change to Technical Specifications (Appendix A to Operating License NPF-5) would be incorporated as follows:

Remove Page	Insert Page
3/4 1-8	3/4 1-8
3/4 3-27	3/4 3-27