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Georgia Power

the southern electric system

NED-85-043
1372N

February 8, 1985

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 2900
101 Marietta Street, NW
Atlanta, Georgia 30323

REFERENCE:
RII:
50-321/50-366
I&E Bulletin
84-02

GENTLEMEN:

By letter dated July 13, 1984 (NED-84-352) Georgia Power Company (GPC) responded to I&E Bulletin 84-02 (dated March 12, 1984). This bulletin requested specific BWR licensee actions for resolving generic concerns with General Electric Company (GE) Type HFA relays.

In the GPC Response to Item a, in our July 13, 1984 letter, we committed to replace certain HFA relays used in safety-related applications at Plant Hatch by the end of the 1985 refueling outages for each unit. However, Bulletin 84-02 allows replacement of the existing coil spools as an alternative to replacement of the entire relay. GPC has determined that in some cases it is more appropriate to replace only the existing coil spools in the subject relays with GE Century Series Tefzel coil spools or equivalent, instead of replacing the entire relay. This still meets the requirements of the subject bulletin, as noted above, which states that the NRC believes that the two replacement options are equivalent.

GPC has determined that either replacement of the entire relay or of the coil spool only will result in a device which is fully qualified for all safety-related applications now performed by Type HFA relays at Plant Hatch. Our commitment as stated in our July 13, 1984, letter, is hereby revised to require either coil spool replacement or replacement of the entire relay, in conformance with the requirements of the Bulletin.

Bulletin 84-02 specifies that the program for replacement of the above referenced HFA relays should be completed by March 12, 1986. GPC committed to meet this deadline in NED-84-352. However, current scheduling on the single refueling outage remaining for each Hatch unit prior to that deadline does not allow adequate time to fully complete this replacement program. These outages are currently planned to last 8 weeks each.

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GPC has determined that the subject relays and coil spools should only be replaced during an outage condition due to the increased probability of accidental initiation of a plant scram or transient if the work is performed with the unit operating. Due to the sensitive nature of these components and the safety significance of the functions which many of them perform, the actual relay and coil spool replacements are best performed by specially trained personnel. Only a limited number of these technicians are available for this effort at Plant Hatch.

GPC has continued to perform monthly functional tests and visual inspections of the subject relays which have not yet undergone replacement, in accordance with the Bulletin requirements. These surveillances continue to demonstrate that the Hatch HFA relays show no appreciable signs of deterioration in either function or physical appearance.

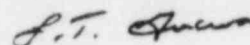
GPC has been experiencing problems in obtaining qualified Century Series relays from GE due to the industry-wide demand for these devices resulting from the requirements of the subject Bulletin. GPC has an adequate quantity of qualified Tefzel coil spools inventoried on site to replace the spools currently in use in all Hatch HFA relays covered by Bulletin 84-02. However, GPC would prefer to entirely replace each of these relays since that effort would require only about one-half of the number of man-hours needed for coil spool replacement. The Enclosure to this letter lists the numbers and types of relays which have been replaced (entirely or coil spools only) and which still require replacement.

Therefore, GPC requests that the replacement deadline for 147 of the subject relays on each Hatch Unit be delayed until the refueling outages scheduled to take place in 1986. All of the relays for which we are requesting this extension are normally de-energized and do not perform Reactor Protection System (RPS) logic functions. The GPC commitment to complete replacement of all RPS and normally energized relays in safety applications by March 12, 1986 is unaffected by this request. This is in accordance with the relay function based replacement priorities established by Bulletin 84-02.

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Should additional qualified relays be received from GE prior to the scheduled unit shutdowns for the 1985 outages (scheduled in April for Unit 2, and November for Unit 1), and should either of these outages be lengthened due to unforeseen reasons, GPC will make every effort to replace as many of the subject relays or coil spools as is possible.

Very truly yours,



L. T. Guwa

CBS/mb

Enclosure

xc: J. T. Beckham, Jr.
H. C. Nix, Jr.
Senior Resident Inspector

STATUS OF REPLACEMENT EFFORT FOR HFA
RELAYS COVERED BY IEB 84-02 AT PLANT HATCH

UNIT 1

Total number of relays covered by the bulletin:
303

Number of relays or coil spools which have been replaced:
84 (all RPS, normally energized)

Number of relays or coil spools scheduled for 1985 replacement:
26 RPS normally energized
46 RPS normally de-energized
72 Total (all RPS)

Number of relays or coil spools scheduled for 1986 replacement:
147 (all non-RPS normally de-energized)

UNIT 2

Total number of relays covered by the bulletin:
303

Number of relays or coil spools scheduled for 1985 replacement:
130 RPS normally energized
26 RPS normally de-energized
156 Total (all RPS)

Number of relays or coil spools scheduled for 1986 replacement:
147 (all non-RPS normally de-energized)