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Georgia Power

the southern electric system

NED-85-061
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March 1, 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
REVISION OF EQUIPMENT QUALIFICATION PROGRAM DEADLINE
EXTENSION REQUEST FOR HYDROGEN/OXYGEN ANALYZERS

Gentlemen:

By letter dated July 17, 1984 (NED-84-383), Georgia Power Company (GPC) requested an extension of the 10 CFR 50.49(g) outage-based equipment qualification deadline to March 31, 1985, for the Plant Hatch Unit 2 Drywell Hydrogen (H₂) and Oxygen (O₂) Analyzers. This extension was granted by the NRC on August 6, 1984. GPC hereby requests a further extension of the qualification deadline.

GPC submitted the earlier extension request due to delays which had occurred in the Loss Of Coolant Accident (LOCA) environmental testing for these devices which is being performed by the manufacturer (Comsip, Inc.). GPC submitted what was then the latest available schedule from Comsip for completion of the test program as Enclosure 1 to NED-84-383. Comsip presented a revised testing schedule to GPC on March 1, 1985, indicating that delays which had occurred during and following the recently completed aging phases of the program would delay the scheduled commencement of the LOCA testing by about six months. An outline of this revised schedule is contained in Enclosure 1 to this letter.

GPC had previously expected to be able to declare these analyzers as fully qualified for use at Plant Hatch well before the March 31, 1985, extended qualification deadline. However, the most recent schedule does not allow an adequate period of time following receipt of the "Thirty Day Interim Test Report" in which to perform the thorough engineering review necessary to establish qualification of this equipment for its intended

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use. Therefore, GPC requests that the current equipment qualification deadline for the Unit 2 H₂ and O₂ analyzers be extended to November 30, 1985, under the provisions of 10 CFR 50.49(g). The additional time requested beyond the currently scheduled end of the test program will allow for any unforeseen delays which could occur during the qualification testing process.

GPC installed a new Comsip-Delphi H₂ and O₂ analyzer system on Unit 2 during the 1984 refueling and recirculation pipe replacement outage. Hatch maintenance personnel have been conducting routine surveillance and calibration of these instruments (as required by plant procedures and Technical Specifications) since the plant restarted August 29, 1984. A number of problems with calibration and operation of these devices have occurred, and for this reason GPC is pursuing other qualification alternatives. However, Comsip is the only H₂ and O₂ analyzer manufacturer who offers environmental qualification for their instruments at this time. Therefore, the current GPC plan is still to use the Comsip-Delphi devices on both Hatch units to provide environmental qualification for this safety function by November 30, 1985.

GPC believes that the superiority of the new Comsip-Delphi H₂ and O₂ analyzers over the equipment which they replace in terms of qualification assurance, outweighs the problems and delays experienced during installation and testing and supports the requested short-term extensions of the qualification deadlines. In addition, by letter dated July 24, 1984 (NED-84-395), GPC has previously submitted "Justifications for Continued Operation" for the plant using these instruments with incomplete qualification.

Very truly yours,

William E. Baum / for

L. T. Gicwa

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Enclosure

xc: J. T. Beckham, Jr.
H. C. Nix, Jr.
J. N. Grace (NRC-Region II)
Senior Resident Inspector

ENCLOSURE 1

NRC DOCKET 50-366
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The following is the Comsip, Inc. schedule for completion of qualification testing for the H₂ and O₂ analyzers procured for use in Plant Hatch Units 1 and 2 as of March 1, 1985:

<u>Testing/Reporting Phase</u>	<u>Predicted Completion Date</u>
Initiation of LOCA Test	March 8, 1985
30 Day LOCA Test	April 7, 1985
30 Day Interim Test Report	April 22, 1985
180 Day LOCA Test	September 5, 1985
Final Test Report	October 26, 1985