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Georgia Power
the southern electric system

D. O. Foster
Vice President and Project
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Vogtle Project

March 7, 1985

United States Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 2900
101 Marietta Street, Northwest
Atlanta, Georgia 30323

Reference:
RII: JPO:
50-424, 50-425

File: X7BC24
Log: GN-543

Attention: Mr. J. Nelson Grace

In our correspondence of February 12, 1985 (X7BC24, GN-524), Georgia Power Company informed the USNRC that our evaluation of I&E Bulletin 84-03, "Refueling Cavity Water Seal", had been re-initiated due to a misinterpretation of the components addressed by the Bulletin. Georgia Power Company has completed its evaluation and wishes to submit the attached revised response to I&E Bulletin 84-03.

This response contains no proprietary information and may be placed in the NRC Public Document Room.

Yours truly,

D. O. Foster

REF/DOF/tdm

IE11

D. O. Foster states that he is the Vice President and Project General Manager of the Vogtle Electric Generating Plant 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.

GPC: D. O. Foster

Sworn and subscribed before me this 7th day of March, 1985.

Jacqueline R. Smith
Notary Public, State of Georgia at Large
My Commission Expires: 4/11/88

xc: U. S. Nuclear Regulatory Commission
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Response to IE Bulletin 84-03

Subject: USNRC IE Bulletin 84-03; Refueling Cavity Water Seal

Purpose: The subject bulletin was provided to: (1) notify licensees of an incident in which the refueling cavity water seal failed and rapidly drained the refueling cavity, and (2) request licensees to take certain actions to assure fuel uncovery during refueling remains an unlikely event.

Applicability:

Catastrophic failure of the VEGP refueling cavity seal is not considered credible.

The seal assembly is of the passive mechanical type and consists of an angle plate welded to the cavity liner plate on the bottom and the reactor vessel seal ledge on top. Therefore, the VEGP seal assembly is not subject to active failure mechanisms.

Any leakage of the seal resulting from undetected failure of the angle plate or welds would be directed to the reactor cavity sump. The cavity sump is monitored by redundant nonsafety grade level switches, which actuate the cavity sump pumps, and a separate safety grade level transmitter. Seal leakage in excess of the sump pumps capacity (100 gpm total) would be alarmed in the control room when the sump reaches the high level.

The refueling canal is normally filled by using a residual heat removal (RHR) pump aligned to the refueling water storage tank. Therefore, makeup capacity would exceed any credible leakage for the duration of the event.

The top of the fuel assemblies in the spent fuel pool are at the same elevation as the refueling cavity seal. Therefore seal failure would not result in uncovering the stored spent fuel assemblies.

The refueling cavity can be drained down to the level of the refueling cavity seal in under two hours by using one RHR pump to return the water to the refueling water storage tank.

From the above considerations, the current VEGP design is capable of mitigating any credible failure of the refueling cavity seal without uncovering fuel and no corrective action in response to this bulletin is required.