

Georgia Power Company
40 Inverness Center Parkway
Post Office Box 1295
Birmingham, Alabama 35201
Telephone 205 877-7122

C. K. McCoy
Vice President, Nuclear
Vogtle Project



Georgia Power

the southern electric system

August 31, 1992

ELV-03841
000465

Docket Nos. 50-424
50-425

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT
REQUEST TO REVISE TECHNICAL SPECIFICATIONS
4.8.1.1.2.h.6 AND 4.8.1.1.2.h.7

In accordance with the provisions of 10 CFR 50.90 and 10 CFR 50.59, Georgia Power Company (GPC) hereby proposes to amend the Vogtle Electric Generating Plant (VEGP) Unit 1 and Unit 2 Technical Specifications, Appendix A to Operating Licenses NPF-68 and NPF-81. The proposed amendment would revise the Technical Specification (TS) surveillance requirements for the diesel generators (DGs) to remove the requirement to simulate a loss of offsite power (LOOP) in conjunction with an engineered safety feature actuation system (ESFAS) test signal within 5 minutes of completing the required 24-hour full-load-carrying capability test. In place of this requirement, the LOOP/ESFAS test would be preceded by a period of operation under load sufficient to ensure that the DGs achieve stable operating temperature. Surveillance requirements 4.8.1.1.2.h.6 and 4.8.1.1.2.h.7 would be affected by the proposed change. In order that the revised testing requirements can be implemented during the Spring 1993 refueling outage, GPC requests approval of the proposed amendment by February 3, 1993.

The proposed change and its basis are described in enclosure 1. Our evaluation pursuant to 10 CFR 50.92 showing that the proposed change does not involve significant hazards considerations is provided in enclosure 2. A mark up of the affected page is provided as enclosure 3. In accordance with 10 CFR 50.91, the designated state official will be sent a copy of this letter and all enclosures.

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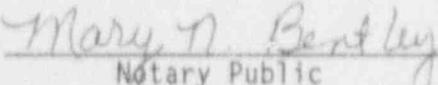
U. S. Nuclear Regulatory Commission
Request to Revise Technical Specifications
ELV-03841
Page 2

Mr. C. K. McCoy states that he is a 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 and enclosures are true.

GEORGIA POWER COMPANY

By: 
C. K. McCoy

Sworn to and subscribed before me this 31st day of August 1992.


Notary Public

MY COMMISSION EXPIRES MAY 6, 1995

CKM/NJS

Enclosures:

1. Basis for Proposed Change
2. 10 CFR 50.92 Evaluation
3. Marked Up Page

c(w): Georgia Power Company
Mr. W. B. Shipman
Mr. M. Sheibani
NORMS

U. S. Nuclear Regulatory Commission
Mr. S. D. Ebnetter, Regional Administrator
Mr. D. S. Hood, Licensing Project Manager, NRR
Mr. B. R. Bonser, Senior Resident Inspector, Vogtle

State of Georgia
Mr. J. D. Tanner, Commissioner, Department of Natural Resources

ENCLOSURE 1

VOGTLE ELECTRIC GENERATING PLANT REQUEST TO REVISE TECHNICAL SPECIFICATIONS 4.8.1.1.2.h.6 AND 4.8.1.1.2.h.7

BASIS FOR PROPOSED CHANGE

Proposed Change

The Vogtle Electric Generating Plant (VEGP) Unit 1 and Unit 2 Technical Specifications (TS) require, in part, that the diesel generators (DGs) be tested at least once per 18 months, during shutdown, by operating the DGs at specified loads for 24 hours (TS 4.8.1.1.2.h.7). Within 5 minutes after completing this 24-hour test, the DGs are to be subjected to another test by simulating a loss of offsite power (LOOP) in conjunction with an engineered safety feature actuation system (ESFAS) test signal and verifying the loading sequence. The DG is to be operated for at least 5 minutes while loaded with the emergency loads (TS 4.8.1.1.2.h.6). However, if the second test is not successfully completed, the 24-hour test does not have to be repeated. Instead, the DG may be operated at the load specified by surveillance requirement 4.8.1.1.2.a.5 for 1 hour or until the DG operating temperature has stabilized, prior to reperforming the LOOP/ESFAS test.

The proposed change would remove the requirement to perform the LOOP/ESFAS test within 5 minutes after completing the 24-hour test. Instead, the LOOP/ESFAS test would be preceded by a period of operation at a specified load for 1 hour or until operating temperature has stabilized.

Basis

The existing surveillance requirements are derived from Regulatory Guide 1.108, Revision 1, "Periodic Testing of Diesel Generator Units Used as Onsite Electric Power Systems at Nuclear Power Plants," which provides guidelines for monitoring DG performance and reliability via an assortment of periodic tests. The basis for the existing requirement to perform a LOOP/ESFAS test within 5 minutes of completing the 24-hour test is to demonstrate hot restart capability under full-load operating temperature conditions. However, it is not necessary to operate the DG for 24 hours under the conditions specified by TS 4.8.1.1.2.h.7 to ensure hot restart capability. This is further supported by the fact that the existing surveillance requirement provides for the contingency that the LOOP/ESFAS test may not be successfully completed by requiring that the DG be operated at a specified load for 1 hour or until operating temperature has stabilized prior to reperforming the LOOP/ESFAS test. The 24-hour test does not have to be repeated if the LOOP/ESFAS test is not successfully completed.

Past operating experience has demonstrated that operating the DGs at the load specified by surveillance requirement 4.8.1.1.2.a.5 (6800-7000 kW) will result in stable, full-load operating temperatures in less than 1 hour. Furthermore, this is the same loading specified by surveillance requirement 4.8.1.1.2.h.7 for

ENCLOSURE 1

VOGTLE ELECTRIC GENERATING PLANT
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4.8.1.1.2.h.6 AND 4.8.1.1.2.h.7

BASIS FOR PROPOSED CHANGE

the last 22 hours of the 24-hour test. Consequently, the proposed amendment to operate the DGs for 1 hour (or until operating temperature has stabilized) is consistent with the intent of Regulatory Guide 1.108, Revision 1 and provides an equivalent level of safety.

In addition, the proposed amendment would provide additional flexibility for outage planning and execution. Under the existing requirement, the 24-hour test, in combination with the LOOP/ESFAS test, must be scheduled at a time during the outage when all of the DG emergency loads are operable and capable of satisfying the requirements of the LOOP/ESFAS test. Under the terms of the proposed amendment, these surveillance tests could be scheduled independently, thereby improving outage scheduling and execution.

Finally, the proposed amendment is also supported by the April 1992 draft Revision 3 to Regulatory Guide 1.9, "Selection, Design, Qualification, Testing, and Reliability of Emergency Diesel Generator Units Used as Class 1E Onsite Electric Power Systems at Nuclear Power Plants." This guidance describes a "Hot Restart Test" which simply requires the DG to be started from full-load temperature conditions by a manual or autostart signal. This test is not coupled to the 24-hour "Endurance and Margin Test" which is also discussed by draft Revision 3 of Regulatory Guide 1.9.

ENCLOSURE 2

VOGTLE ELECTRIC GENERATING PLANT REQUEST TO REVISE TECHNICAL SPECIFICATIONS 4.8.1.1.2.h.6 AND 4.8.1.1.2.h.7

10 CFR 50.92 EVALUATION

Pursuant to 10 CFR 50.92, GPC has evaluated the proposed amendment and has determined that operation of the facility in accordance with the proposed amendment would not involve a significant hazards consideration. The basis for this determination is as follows:

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated. Separating the 24-hour test from the LOOP/ESFAS test will have no effect on the initiating events assumed for any existing accident analysis. The basis for the existing requirement is to ensure the hot restart capability of the DGs. The proposed change in requirements will continue to demonstrate that capability, and the DGs will remain able to perform their safety function as assumed in the accident analyses. Therefore, there will be no effect on the consequences of any existing accident analyses.
2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated. The change does not introduce any new equipment into the plant or require any existing equipment to be operated in a manner different than that for which it was designed to operate. The proposed change only involves the duration for which the full-load temperature conditions are maintained prior to performing the LOOP/ESFAS test. Therefore, the performance, reliability, or capability of the DGs to perform their design function will not be affected.
3. The proposed change does not involve a significant reduction in a margin of safety. The basis for the existing requirement is to ensure the hot restart capability of the DGs. The proposed change will continue to ensure that capability, thereby maintaining the margin of safety afforded by the existing surveillance requirements.

Based on the preceding analysis, GPC has determined that the proposed change to the Technical Specifications will not significantly increase the probability or consequences of an accident previously evaluated, create the possibility of a new or different kind of accident from any accident previously evaluated, or involve a significant reduction in a margin of safety. Georgia Power Company therefore concludes that the proposed change meets the requirements of 10 CFR 50.92(c) and does not involve a significant hazards consideration.

ENCLOSURE 3

VOGTLE ELECTRIC GENERATING PLANT
REQUEST TO REVISE TECHNICAL SPECIFICATIONS
4.8.1.1.2.h.6 AND 4.8.1.1.2.h.7

Marked Up Page