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HL-2335
000950

September 2, 1992

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

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
**REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
TOP OF ACTIVE FUEL REFERENCE**

Gentlemen:

In accordance with the provisions of 10 CFR 50.90, as required by 10 CFR 50.59(c)(1), Georgia Power Company (GPC) hereby proposes changes to the Plant Hatch Units 1 and 2 Technical Specifications (TS), Appendix A to Operating Licenses DPR-57 and NPF-5.

The proposed amendment corrects the reactor pressure vessel (RPV) water level reference corresponding to the Top of Reactor Fuel (TAF) for both units from the value representing the TAF prior to the purchase of 8x8 fuel to the value applicable to 8x8 fuel and subsequent fuel designs. The correct value is 6 inches higher than the value shown in the TS on Unit 1 figure 2.1-1 and Unit 2 figure B 3/4 3-1.

Enclosure 1 provides a description of the circumstances necessitating the change request. Enclosure 2 provides the bases for GPC's determination the request does not represent a significant hazards consideration. Enclosure 3 provides page change instructions for incorporating the proposed change. Following the enclosures are the proposed changed TS pages followed by the markups.

To allow time for procedure revisions and orderly incorporation into copies of the TS, GPC requests the proposed amendment, once approved by the NRC, be issued with a required implementation date to be no later than 60 days from the date of issuance of the amendment.

In accordance with the requirements of 10 CFR 50.91, the designated state official will be sent a copy of this letter and all applicable enclosures.

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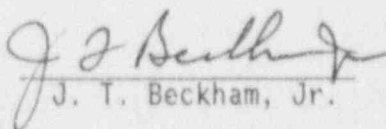
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Mr. J. T. Beckham states he is duly authorized to execute this oath on behalf of Georgia Power Company, and to the best of his knowledge and belief, the facts set forth in this letter are true.

GEORGIA POWER COMPANY

BY: 
J. T. Beckham, Jr.

Sworn to and subscribed before me this 1st day of September 1992.

MY COMMISSION EXPIRES JUNE 30, 1996

OCV/sp


Notary Public

Enclosures:

1. Basis for Change Request.
2. 10 CFR 50.92 Evaluation.
3. Page Change Instructions followed by corresponding markups.

c: Georgia Power Company

Mr. H. L. Sumner, General Manager - Nuclear Plant
NORMS

U.S. Nuclear Regulatory Commission, Washington, D.C.
Mr. K. Jabbour, Licensing Project Manager - Hatch

U.S. Nuclear Regulatory Commission, Region II
Mr. S. D. Ebner, Regional Administrator
Mr. L. D. Wert, Senior Resident Inspector - Hatch

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

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ENCLOSURE 1

PLANT HATCH - UNITS 1, 2
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OPERATING LICENSES DPR-57, NPF-5
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
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BASIS FOR CHANGE REQUEST

PROPOSED CHANGE:

The proposed amendment revises Unit 1 TS figure 2.1-1 and Unit 2 TS figure B 3/4 3-1 to reflect the correct Top of Active Fuel (TAF) reactor pressure vessel (RPV) water level.

Basis for Proposed Change:

Recently, an error in Unit 1 TS figure 2.1-1 and Unit 2 figure B 3/4 3-1 TAF notations was discovered. The same incorrect value also appeared in the Unit 1 and Unit 2 FSARs, and plant procedures. The TAF level indicated on the referenced figures (i.e., 352.56 inches) is correct for GE 7x7 fuel design which had a fuel length of 144 inches. However, Plant Hatch no longer uses 7x7 fuel. Subsequent fuel designs purchased in the mid-to-late 1980s have maximum active fuel lengths of 150 inches. The top 6 inches of fuel in the 8x8 and newer fuels are made of nonenriched uranium. The TAF value presently referenced in the TS, as well as plant procedures, is still based on 144-inch length fuel and, therefore, should be revised to reflect the actual dimension of later fuel designs.

It should be noted that the correct TAF value (358.56 inches) was used in the SAFER/GESTR accident analysis. In fact, the initiating RPV level setpoints for the emergency core cooling systems (ECCSs) assumed in the analysis are much lower than the actual plant setpoints. Therefore, use of the incorrect TAF value (352.56 inches) does not affect the present Levels 1, 2, and 3 setpoints or any other aspect of loss of coolant accident (LOCA) analyses.

In addition to the TAF change to Unit 1 TS figure 2.1-1 and Unit 2 TS figure B 3/4 3-1, a minor editorial enhancement (removal of two extraneous tick marks) is being made. This change is purely administrative in nature.

ENCLOSURE 2

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
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10 CFR 50.92 EVALUATION

The Commission has provided standards in 10 CFR 50.92(c) for determining whether a significant hazards consideration exists. A proposed amendment to an operating license for a facility involves no significant hazards if operation of the facility, in accordance with the proposed amendment, will not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated,
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated, or
- 3) Involve a significant reduction in a margin of safety.

Basis for proposed no significant hazards consideration determination:

Georgia Power Company (GPC) has reviewed the proposed license amendment and determined its adoption will not involve a significant hazards consideration based on the following:

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change only involves revising Unit 1 TS figure 2.1-1 and Unit 2 TS figure B 3/4 3-1 to correct the Top of Active Fuel (TAF) indicated value. The change accounts for the newer design fuel assemblies which contain 6 inches of nonenriched uranium at the top of the bundle, thereby making the active fuel length 150 inches, as opposed to 144 inches, and the TAF boundary at 358.56 inches, as opposed to the 352.56 inches (referenced from vessel zero) currently indicated in the TS.

No changes to systems designed to mitigate the consequences of an accident are proposed.

ENCLOSURE 2 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
TOP OF ACTIVE FUEL REFERENCE

10 CFR 50.92 EVALUATION

The proposed change does not affect any previously analyzed accident, because all SAFER/GESTR accident analyses were performed using the correct fuel length and TAF value. The same analyses also assumed the RPV levels at which the emergency core cooling systems (ECCSs) would initiate in response to these design basis events are much lower than the actual plant setpoints. Thus, raising the TAF boundary by 6 inches does not affect or require a change to accident analyses, since the analyses utilized the correct fuel length and TAF boundary.

ECCS RPV level setpoints will not be affected by the proposed change, since the analyses used the correct TAF value and assumed initiating setpoints that are much lower than the actual plant settings. The proposed change will merely bring the TS in agreement with the actual plant configuration.

In summary, the proposed change does not involve any physical changes to the plant which would increase the probability of occurrence of a loss of coolant accident (LOCA). The consequences of previously analyzed LOCAs are not increased, because no changes are being proposed to systems designed to mitigate the consequences of LOCAs, and previous accident analyses have already been performed, considering the correct TAF number.

The minor editorial change is strictly an aesthetic enhancement which does not affect the design or operation of any plant equipment or system.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.
 - a. The proposed change only involves changing the TS to reflect the actual plant configuration and making an insignificant editorial change.
 - b. No physical changes to the plant are proposed.
 - c. No changes involving operating systems or equipment outside of their intended design are proposed.

ENCLOSURE 2 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
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10 CFR 50.92 EVALUATION

Thus, no new modes of operation are introduced, and the possibility of occurrence of a different type of event from any previously evaluated is not created.

3. The proposed event does not involve a significant reduction in the margin of safety.

The SAFER/GESTR accident analyses under which Plant Hatch is currently licensed used the correct fuel length and TAF boundary. In addition, the RPV level ECCS initiating setpoints were assumed to be much lower than TS or actual plant setpoints. Therefore, the margin of safety is not affected, since the proposed change only achieves consistency between the TS and the actual plant configuration. Neither the accident analyses nor the ECCS RPV level setpoints will change.