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J. T. Beckham, Jr.
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Georgia Power
the southern electric system

July 24, 1996

Docket Nos. 50-321
50-366

HL-5208

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

Edwin I. Hatch Nuclear Plant
Third IST Interval Program Update:
Safety Evaluation Response

Gentlemen:

By letter dated June 4, 1996, Georgia Power Company (GPC) responded to the NRC Safety Evaluation (SE) for GPCs Third 10-Year Interval IST Program for the Edwin I. Hatch Nuclear Plant. In that response, GPC committed to submit revisions to Relief Requests RR-V-4, RR-V-8, and RR-V-9 to the NRC by August 30, 1996. Relief Requests RR-V-4, Rev. 3; RR-V-8, Rev. 3; and RR-V-9, Rev. 3 are hereby submitted in response to that commitment. The actual IST Program document revision which incorporates these changes is in development, with an anticipated completion by the end of August 1996.

Should you have any questions in this regard, please contact this office.

Sincerely,

J. T. Beckham, Jr.

IFL/eb

Attachments:
1. Relief Request RR-V-4
2. Relief Request RR-V-8
3. Relief Request RR-V-9

cc: (See next page.)

A047 1/1

cc: *Georgia Power Company*
Mr. H. L. Sumner, Nuclear Plant General Manager
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. Ebneter, Regional Administrator
Mr. B. L. Holbrook, Senior Resident Inspector - Hatch

Attachment 1

RELIEF REQUEST

RR-V-4

RELIEF REQUEST

RR-V-4

SYSTEM: Traversing Incore Probe (TIP)

VALVE: 1C51-F3012

CATEGORY: A

CLASS: 2

FUNCTION: Containment Isolation

TEST REQUIREMENT: ISTC 4.2.1 and ISTC 4.2.4(a) require power operated valves to be stroke timed quarterly and ISTC 4.2.8 requires comparison testing to the reference stroke time value.

BASIS FOR RELIEF: The safety position of this valve is CLOSED to provide containment isolation which is initiated by a LOCA signal and results in isolation of TIP purge and the TIP probes. The Technical Specifications nor the FSAR have any specific requirements for isolation stroke time for this valve.

This is a normally open, normally energized solenoid operated valve which strokes in milliseconds. The valve was not provided with remote indicating lights and its design does not provide for observation of actual stem movement.

A simple check valve is located upstream of this solenoid valve which provides outboard containment isolation of the penetration. Nitrogen purge is at a steady flow and pressure which does not impose any harsh operating conditions on this check valve. Therefore, additional assurance is provided for isolation of the associated penetration.

The purge line is small (3/8") and the FSAR evaluation indicates that even in the event of a TIP dry tube failure and non-isolation of the purge line, the radioactive release would remain within the allowable limits.

Since this valve strokes in milliseconds, it is classified as a rapid acting valve per GL 89-04, Position 6. Therefore, if indicating lights or valve stem movement were observable, comparison time testing of valves with stroke times of less than or equal to 2 seconds is not required per ISTC 4.2.8(e).

Industry history indicates that solenoid valves either operate properly or not at all. It has not been established that stroke time testing of solenoid valves provides data applicable for evaluation of degradation. The application of some type of electronic monitoring would be on a trial and error basis since no such equipment has been proven to provide useful test data to date. Considering the safety function of the valve (containment isolation) and the redundancy of this function provided by a simple check valve, stroke time testing to monitor degradation will not provide

a significant increase in assurance that the valve is capable of performing its intended function.

ALTERNATE TESTING: The valve will be exercised closed quarterly, and observation of a decrease in nitrogen pressure in the associated tubing will be utilized as confirmation that the valve is in the safety related closed position.

This valve is exercised closed and local leak rate tested (LLRT) at each refueling outage in accordance with 10 CFR 50, Appendix J. LLRT provides assurance that the valve is in the closed position and thus is capable of providing its safety function of containment isolation.

Additionally, per the guidance included in NUREG-1482, Section 4.2.8, this valve will be included in the site maintenance program for periodic replacement. Review of the past maintenance history, consideration of the valve's environment, and review of system operating characteristics and the valve's safety function support a replacement frequency of every 5 years. The valve will be replaced during the 1997 refueling outage and every 5 years thereafter.

Attachment 2

RELIEF REQUEST

RR-V-8

RELIEF REQUEST

RR-V-8

SYSTEM: Plant Service Water

VALVE(S): 1P41-F035A&B, 1P41-F036A&B, 1P41-F037A-D, 1P41-F039A&B, 2P41-F035A&B 2P41-F036A&B, 2P41-F037A-D, 2P41-F039A&B, 2P41-F339A&B, 2P41-F340

CATEGORY: B

CLASS: 3

FUNCTION: Equipment Cooling Water Supply Valves

TEST REQUIREMENT: ISTC 4.2.3 requires verification of valve obturator movement by observing an appropriate indicator, such as indicator lights, or by observing other evidence, such as changes in system pressure, flow rate, level, or temperature, that reflects changes in obturator movement.

BASIS FOR RELIEF: These valves are normally closed, fail open air operated valves which have a safety function to open and provide cooling water flow to the associated safety related equipment. System design did not provide indicating lights, instrumentation or direct valve control switches.

All valves receive an open signal upon initiation of the associated equipment and a close signal upon termination of operation of the associated equipment. The 2P41-F339A & B valves are equipped with local control switches, but do not have position indicating lights. Therefore, verification of obturator movement and stroke time measurement can only be performed by observation of actual stem movement for all valves.

ALTERNATE TESTING: Verification of obturator movement and measurement of valve stroke time will be performed by observing actual valve stem movement. Stroke time will be considered to be the time from start to stop of valve stem movement. Each valve is equipped with either a stem mounted pointer and a yoke mounted position indicating scale, or a percent open/closed indicator. This position indicating device will be observed during stroke timing to determine full open/full close operation. The requirements of ISTC 4.2.8 will be applied to monitor valve degradation.

Attachment 3

RELIEF REQUEST

RR-V-9

RELIEF REQUEST

RR-V-9

SYSTEM: Traversing Incore Probe (TIP)

VALVE: 2C51-F3012

CATEGORY: A

CLASS: 2

FUNCTION: Containment Isolation

TEST REQUIREMENT: ISTC 4.2.1 and ISTC 4.2.4(a) require power operated valves to be stroke timed quarterly and ISTC 4.2.8 requires comparison testing to the reference stroke time value.

BASIS FOR RELIEF: The safety position of this valve is CLOSED to provide containment isolation which is initiated by a LOCA signal and results in isolation of TIP purge and the TIP probes. Neither the Technical Specifications or the FSAR have any specific requirements for isolation stroke time for this valve.

This is a normally open, normally energized solenoid operated valve which strokes in milliseconds. The valve was not provided with remote indicating lights and its design does not provide for observation of actual stem movement (stem is fully enclosed).

A simple check valve is located upstream of this solenoid valve which provides outboard containment isolation of the penetration. Nitrogen purge is at a steady flow and pressure which does not impose any harsh operating conditions on this check valve. Therefore, this upstream check valve provides additional assurance for isolation of the associated penetration.

The purge line is small (3/8") and the FSAR evaluation indicates that even in the event of a TIP dry tube failure and non-isolation of the purge line, the radioactive release would remain within the allowable limits.

Since this valve strokes in milliseconds, it is classified as a rapid acting valve per GL 89-04, Position 6. Therefore, if indicating lights or valve stem movement were observable, comparison time testing of valves with stroke times of less than or equal to 2 seconds is not required.

Industry history indicates that solenoid valves either operate properly or not at all. It has not been established that stroke time testing of solenoid valves provides data applicable for evaluation of degradation. The application of some type of electronic monitoring would be on a trial and error basis since no such equipment has been proven to provide useful test data to date. Considering the safety

function of the valve (containment isolation only) and the redundancy of this function provided by a simple check valve, testing to monitor degradation will not provide a significant increase in assurance that the valve is capable of performing its intended function.

ALTERNATE TESTING: This valve will be exercised closed quarterly, and observation that nitrogen flow in the associated tubing has stopped will be utilized as confirmation that the valve is in the safety related closed position.

This valve is local leak rate tested (LLRT) at each refueling outage in accordance with 10 CFR 50, Appendix J. LLRT provides assurance that the valve is in the closed position and thus is capable of providing its safety function of containment isolation.

Additionally, per the guidance included in NUREG-1482, Section 4.2.8, this valve will be included in the site maintenance program for periodic replacement. Review of the past maintenance history, consideration of the valve's environment, and review of system operating characteristics and the valve's safety function support a replacement frequency of every 5 years. The valve will be replaced during the 1997 refueling outage and every 5 years thereafter.