

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

December 7, 1992

ELV-03914

Docket Nos. 50-424
50-425

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

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT
ADDITIONAL INFORMATION FOR TECHNICAL SPECIFICATION
CHANGES RELATING TO GENERIC LETTER 87-09

Georgia Power Company (GPC) letter ELV-03024 dated May 27, 1992, transmitted a request for Technical Specification changes associated with Generic Letter 87-09. As a result of recent telephone conversations with the NRC, Georgia Power Company agreed to revise its previous submittal to address specific issues raised by the NRC. These revisions are contained in enclosures to this letter.

The additional changes and their bases are described in enclosure 1. An evaluation pursuant to 10 CFR 50.92 showing that the changes provided in the original submittal as modified herein do not involve significant hazards considerations is provided as enclosure 2. New instructions for incorporation of the changes both from the original and this submittal into the Technical Specifications are provided as enclosure 3. A revision of the changed pages from the original submittal is also provided in enclosure 3.

Georgia Power Company requests a timely review and concurrence with the Technical Specifications change and requests NRC's approval by December 31, 1992.

11006.

9212140075 921207
PDR ADOCK 05000424
P PDR

AD001 / 1

U. S. Nuclear Regulatory Commission
ELV-03914
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: CKM'G
C. K. McCoy

Sworn to and subscribed before me this 17th day of December, 1992.

Mary A. Bentley
Notary Public

MY COMMISSION EXPIRES MAY 6, 1996

CKM/JDK

Enclosures:

1. Basis for Proposed Change
2. 10 CFR 50.92 Evaluation
3. Instructions for Incorporation and Revised Pages

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
PROPOSED CHANGES TO THE TECHNICAL SPECIFICATIONS
IN RESPONSE TO GENERIC LETTER 87-09

BASIS FOR PROPOSED CHANGES

Additional Proposed Changes from May 27, 1992, Submittal

As a result of recent telephone conversations with the NRC, Georgia Power Company proposes the following changes to its May 27, 1992, submittal:

1. Georgia Power Company withdraws its request for a change to the action statement to Specification 3.7.1.2 which would have prohibited entry into another mode with three auxiliary feedwater pumps inoperable.
2. Georgia Power Company revises its position on the relationship between Specifications 4.0.3 and 4.0.4 with regard to the 24-hour "grace" period provision in Specification 4.0.3 and has revised the bases sections accordingly. This provision will now provide a time limit for Specification 4.0.3 for the completion of surveillance requirements that become applicable as a consequence of mode changes imposed by action requirements and for completing surveillance requirements that are applicable when an exception to the requirements of Specification 4.0.4 is allowed. The bases to Specification 4.0.3 have been modified accordingly.
3. Georgia Power Company revises the Bases to Specification 3.0.3 to correct a typographical omission from its May 27, 1992, letter.
4. Georgia Power Company revises the bases to Specification 4.0.2 to more accurately reflect Specification 4.0.2. The Generic Letter 87-09 wording for the bases of Specification 4.0.2 was developed when Specification 4.0.2 contained the provision that surveillance requirements be performed with "The combined time interval for any 3 consecutive surveillance intervals not to exceed 3.25 times the specified surveillance interval." The NRC later provided guidance where this provision could be deleted, and this has been incorporated into the VEGP Technical Specifications. Therefore, the submittal contains revised wording which deviates slightly from the NRC generic wording in Generic Letter 87-09. However, the revised wording is consistent with the intent of Generic Letter 87-09.
5. Georgia Power Company withdraws its request to delete Action e to Specification 3.6.3 which provided conditionally that the provisions of Specification 3.0.4 are not applicable.

ENCLOSURE 2

VOGTLE ELECTRIC GENERATING PLANT REVISION OF TECHNICAL SPECIFICATIONS AS A RESULT OF GENERIC LETTER 87-09

10 CFR 50.92 EVALUATION

Pursuant to 10 CFR 50.92, CPC has evaluated the proposed amendment provided by its letter dated May 27, 1992, as supplemented by this letter and has determined that operation of the facility in accordance with the proposed amendment would not involve significant hazards considerations. This significant hazards evaluation supercedes the previous evaluation submitted to the NRC on May 27, 1992.

Background

On June 4, 1987, the NRC issued Generic Letter 87-09, which provides guidance for addressing three specific problems that have been encountered with the general requirements on the applicability of limiting conditions for operation (LCO) and surveillance requirements in sections 3.0 and 4.0 of the Technical Specifications. The generic letter also provides an update of the bases for the specifications of sections 3.0 and 4.0. The following is a summary of the three problems addressed by the generic letter and by the proposed changes provided in enclosure 3.

The existing Specification 3.0.4 states that entry into an operational mode or other specified condition shall not be made unless the LCO is met without reliance on the provisions of the action requirements. The intent of this statement is to ensure that a higher mode of operation is not entered when equipment is inoperable or when parameters exceed their specified limits. For example, this would preclude a plant startup when actions are being taken to satisfy an LCO, which, if not completed within the time limits of the action requirements, would result in a plant shutdown to comply with the action requirements. The existing Specification 3.0.4 also precludes entering a mode or specified condition if an LCO is not met, even if the action requirements would permit continued operation of the facility for an unlimited period of time. A number of individual specifications having action requirements which allow continued operation note that Specification 3.0.4 does not apply. However, these exceptions have not been consistently applied, and their bases are not well documented. This application of exceptions to Specification 3.0.4 impacts the operation of the facility in two ways. First, it delays startup under conditions in which conformance to the action requirements establishes an acceptable level of safety for continued operation of the facility for an unlimited period of time. Second, it delays a return to power operation when the facility is required to be in a lower mode of operation as a consequence of other action requirements. In this case, the LCO must be met without reliance on the action requirements before returning the facility to that operational mode or other specified condition for which continued operation for an unlimited period of time was previously permitted in accordance with the action requirements.

ENCLOSURE 2 (CONTINUED)

REVISION OF TECHNICAL SPECIFICATIONS
AS A RESULT OF GENERIC LETTER 87-09

10 CFR 50.92 EVALUATION

The solution to this problem, as recommended by Generic Letter 87-09, is to revise Specification 3.0.4 to define the conditions under which its requirements apply. The recommended revision to Specification 3.0.4 specifies that entry into an operational mode or specified condition may be made in accordance with action requirements when conformance to them permits continued operation of the facility for an unlimited period of time. When an LCO is not met and the associated action requires a shutdown if the LCO cannot be met within a specified time interval, entry into an operational mode or other specified condition is not permitted.

As a result of the recommended modification to Specification 3.0.4, individual specifications with action requirements permitting continued operation no longer need to indicate that Specification 3.0.4 does not apply. Georgia Power Company has reviewed the Technical Specifications to identify those specifications which satisfy the provisions under which mode changes are permitted by the revision to Specification 3.0.4. This proposed amendment includes revisions which delete the noted exception to Specification 3.0.4 for these specifications to avoid confusion about the applicability of Specification 3.0.4.

The second issue addressed by Generic Letter 87-09 concerns Specification 4.0.3 and unnecessary shutdowns caused by inadvertent surpassing of surveillance intervals. The existing Specification 4.0.3 states that the failure to perform a surveillance within the specified time interval shall constitute a failure to meet the operability requirements of the LCO. Therefore, if a surveillance requirement is not met as a result of inadvertent failure to perform the surveillance, the LCO would be entered and the appropriate action requirements must be met.

The action requirements of an LCO generally include a specified time interval (i.e., allowable outage time limit) that permits corrective action to be taken to satisfy the LCO. When such a specified time interval is included in the action requirements, the completion of a missed surveillance within this time interval would satisfy Specification 4.0.3. However, some action requirements have allowable outage time limits of only 1 or 2 hours and do not establish a practical time limit for the completion of a missed surveillance requirement. If surveillances cannot be completed within these time limits, a plant shutdown might be required.

Generic Letter 87-09 concludes that it is overly conservative to assume that systems or components are inoperable simply because a surveillance requirement

ENCLOSURE 2 (CONTINUED)

REVISION OF TECHNICAL SPECIFICATIONS
AS A RESULT OF GENERIC LETTER 87-09

10 CFR 50.92 EVALUATION

has not been performed. The letter also takes the position that the vast majority of surveillances demonstrate that systems or components in fact are operable. Georgia Power Company concurs with both of these statements. Therefore, this amendment proposes to revise Specification 4.0.3 as recommended by Generic Letter 87-09.

The proposed revision to Specification 4.0.3 and associated bases clarifies when a missed surveillance constitutes a violation of the operability requirements of an LCO. The proposed change also clarifies the applicability of the action requirements and the time during which the limits apply. In those cases where the allowable outage time limits of the action requirements are less than 24 hours, the action requirements may be delayed for up to 24 hours to permit the completion of a missed surveillance. This part of the revision to Specification 4.0.3 involves the adoption of the wording suggested in the generic letter. The statement that exceptions to Specification 4.0.3 are noted in individual specifications is deleted because the implied exceptions for these specifications no longer exist.

The third issue involves conflicts between Specifications 4.0.3 and 4.0.4 relating to mode changes. Currently, Specification 4.0.4 prohibits entry into an operational mode or other specified condition when surveillance requirements associated with the LCOs that are applicable in that mode or specified condition have not been performed within the specified surveillance interval. However, in the event that a shutdown is required by an LCO and the plant is forced to pass through or enter a mode or specified condition where surveillance requirements that have not been met become applicable, the action requirements of the LCO associated with these surveillance requirements apply and the unit may have to be placed in a lower mode of operation than that required by the original shutdown action requirements. According to Generic Letter 87-09, it is not the intent of Specification 4.0.4 to prevent passage through or to operational modes to comply with action requirements, and it should not apply when mode changes are imposed by action requirements. Accordingly, Georgia Power Company proposes to revise Specification 4.0.4 as recommended by Generic Letter 87-09.

In addition, this proposed amendment includes revised bases for sections 3.0 and 4.0 of the Technical Specifications. The revised bases reflect the revisions to Specifications 3.0.4, 4.0.3, and 4.0.4, as well as improved bases for the unchanged requirements of sections 3.0 and 4.0. The revisions to the

ENCLOSURE 2 (CONTINUED)

REVISION OF TECHNICAL SPECIFICATIONS
AS A RESULT OF GENERIC LETTER 87-09

10 CFR 50.92 EVALUATION

bases are as recommended by Generic Letter 87-09 with one exception. Georgia Power Company proposes to retain the example in the bases for Specification 3.0.3 to illustrate the manner in which allowable outage time limits should be administered. The proposed example is as follows:

"For example, if the Containment Spray System was discovered to be inoperable while in START-UP, the ACTION Statement would allow up to 156 hours to achieve COLD SHUTDOWN. If HOT STANDBY is attained in 16 hours rather than the allowed 78 hours, 140 hours would still be available before the plant would be required to be in COLD SHUTDOWN. However, if this system was discovered to be inoperable while in HOT STANDBY, the 6 hours provided to achieve HOT STANDBY would not be additive to the time available to achieve COLD SHUTDOWN so that the total allowable time is reduced from 156 hours to 150 hours."

The above example was taken from the current version of the Technical Specifications. Georgia Power Company believes that this example provides desirable clarification and is consistent with the intent of Specification 3.0.3.

Analysis

Georgia Power Company has reviewed the requirements of 10 CFR 50.92 as they relate to the proposed changes to sections 3.0 and 4.0 of the Technical Specifications and has determined that these changes do not involve a significant hazards consideration. In support of this conclusion, the following analyses are provided.

1. Revision to Specification 3.0.4 and associated bases

- a. The proposed change will not significantly increase the probability or consequences of an accident previously evaluated because the change simply recognizes those cases where conformance to the action requirements associated with an LCO establishes an acceptable level of safety for continued operation of the facility for an unlimited period of time. Generally, individual specifications that have action requirements which allow continued operation note that Specification 3.0.4 does not apply. However, exceptions to Specification 3.0.4 have not been consistently applied. Rather than applying individual

ENCLOSURE 2 (CONTINUED)

REVISION OF TECHNICAL SPECIFICATIONS
AS A RESULT OF GENERIC LETTER 87-09

10 CFR 50.92 EVALUATION

exceptions to Specification 3.0.4 (except in those cases where an exception to Specification 3.0.4 exists and the specification does not satisfy the provisions under which mode changes are permitted by the revision to Specification 3.0.4) the revision to Specification 3.0.4 defines the conditions under which the requirements do apply. Furthermore, Georgia Power Company concurs with the NRC staff position that good practice dictates that plant startup should normally be initiated only when all required equipment is operable, and that startup with inoperable equipment must be the exception rather than the rule. Therefore, since the proposed change will ensure consistent application of Specification 3.0.4 while continuing to ensure an acceptable level of safety for continued operation of the facility, the probability or consequences of an accident previously evaluated will not be significantly increased.

- b. This change does not create the possibility of a new or different kind of accident from any accident previously evaluated. If an LCO has action requirements that permit continued operation for an unlimited period of time, it follows that an acceptable level of safety is provided by conformance to those action requirements. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.
 - c. The proposed change will not involve a significant reduction in a margin of safety. As previously stated, the proposed revision to Specification 3.0.4 defines the conditions under which Specification 3.0.4 applies. The fact that the action requirements allow for continued operation of the facility for an unlimited period of time implies that an acceptable level of safety is provided for and maintained by conformance to the action requirements. Therefore, it follows that the proposed change does not involve a significant reduction in a margin of safety.
2. Deletion of individual exceptions to Specification 3.0.4

Where individual specifications satisfy the provisions of revised Specification 3.0.4 under which mode changes would be allowed, the individual exemption statements have been deleted. The following specifications and tables are affected by this change:

ENCLOSURE 2 (CONTINUED)

REVISION OF TECHNICAL SPECIFICATIONS
AS A RESULT OF GENERIC LETTER 87-09

10 CFR 50.92 EVALUATION

<u>Specification</u>				<u>Table</u>
3.1.3.2	3.4.10	3.11.1.1	3.11.2.6	3.3-1
3.2.4	3.7.1.5	3.11.1.2	3.11.3	3.3-2
3.3.3.1	3.7.9	3.11.1.3	3.11.4	3.3-8
3.3.3.2	3.7.10	3.11.1.4	3.12.1	
3.3.3.3	3.8.4.1	3.11.2.1	3.12.2	
3.3.3.4	3.9.7	3.11.2.2	3.12.3	
3.3.3.9	3.9.9	3.11.2.3		
3.3.3.10	3.9.11	3.11.2.4		
3.3.3.11	3.9.12	3.11.2.5		

- a. The proposed change will not significantly increase the probability or consequences of an accident previously evaluated. Each specification listed above presently contains an exception to the provisions of Specification 3.0.4. Georgia Power Company has determined that all or part of these specifications listed above satisfy the provisions of revised Specification 3.0.4 under which mode changes would be allowed. In other words, each specification has action requirements which provide an acceptable level of safety for continued operation of the facility for an unlimited period of time. Therefore, in accordance with Generic Letter 87-09 the individual exceptions to Specification 3.0.4 are no longer required and should be deleted in order to avoid confusion about the applicability of Specification 3.0.4. The net effect is that there is no change in the requirements. The individual exceptions to Specification 3.0.4 will be replaced by revised Specification 3.0.4. Since there is no net change in the requirements, it follows that the proposed change will not significantly increase the probability or consequences of an accident previously evaluated.
- b. This change does not create the possibility of a new or different kind of accident from any accident previously evaluated. Since there is no net change in the requirements, it follows that there is no possibility of a new or different kind of accident as a result of this change.
- c. The proposed change will not involve a significant reduction in the margin of safety because there is no net change in the requirements.

ENCLOSURE 2 (CONTINUED)

REVISION OF TECHNICAL SPECIFICATIONS
AS A RESULT OF GENERIC LETTER 87-09

10 CFR 50.92 EVALUATION

3. Revision to Specification 4.0.3 and associated bases

- a. The proposed change will not significantly increase the probability or consequences of an accident previously evaluated. The existing Unit 1 Technical Specifications state that the allowable outage time limits apply upon discovery that a required surveillance has been inadvertently omitted. Therefore, the only change in requirements associated with adopting the wording of Generic Letter 87-09 for Specification 4.0.3 and its associated bases involves the addition of a 24-hour interval for performing a missed surveillance if the allowable outage time is less than 24 hours.

Generic Letter 87-09 states that it is overly conservative to assume that systems or components are inoperable when a surveillance requirement has not been performed. The letter further states that the majority of surveillances demonstrate that systems or components in fact are operable, and when a surveillance is missed it is primarily a question of verification of operability by the performance of the required surveillance. In some cases, the condition of a missed surveillance could force a plant shutdown which would be unnecessary if in fact the system or component in question was operable. If a plant shutdown is required before a missed surveillance is completed, it is likely that it would be conducted while the plant is being shut down because completion of a missed surveillance could terminate the shutdown requirement. This is undesirable since it increases the risks to the plant and public safety for two reasons. First, the plant would be in a transient state involving changing plant conditions that offer the potential for an upset that could lead to a demand for the system or component being tested. Secondly, a shutdown would increase the pressure on the plant staff to expeditiously complete the required surveillance so that the plant could be returned to power operation. This would further increase the potential for a plant upset when both the shutdown and surveillance activities place a demand on the plant operations. The NRC staff has concluded that, based on consideration of plant conditions, adequate planning, availability of personnel, time required to perform the missed surveillance, and the safety significance of the delay in completion of the surveillance, 24 hours would be an acceptable time limit for completing a missed surveillance.

ENCLOSURE 2 (CONTINUED)

REVISION OF TECHNICAL SPECIFICATIONS
AS A RESULT OF GENERIC LETTER 87-09

10 CFR 50.92 EVALUATION

when the allowable outage time limit is less than 24 hours or when shutdown action requirements apply. Furthermore, the NRC staff concludes that the 24-hour time limit would balance the risks associated with an allowance for completing the surveillance within this period against the risks associated with the potential for a plant upset and challenge to safety systems when the alternative is a shutdown to comply with action requirements before the surveillance can be completed. Finally, the deletion of the statement that exceptions to Specification 4.0.3 are noted in individual specifications is an administrative change since the implied exceptions do not exist. Specification 4.0.3 always applies.

Georgia Power Company agrees with the evaluation of the NRC staff as presented in Generic Letter 87-09 and therefore concludes that this aspect of the revision to Specification 4.0.3 will not involve a significant increase in the probability or consequences of an accident previously evaluated.

- b. This change does not create the possibility of a new or different kind of accident from any accident previously evaluated. As stated in item 3a above, the proposed revision should minimize the potential for a plant upset due to efforts to comply with an LCO in the event of a missed surveillance. The deletion of the statement regarding noted exceptions to Specification 4.0.3 is an administrative change since the noted exceptions do not exist. Therefore, this change does not create the possibility of a new or different kind of accident.
 - c. The proposed change does not involve a significant reduction in the margin of safety. Equipment operability will continue to be verified as required by the Technical Specifications. The proposed revision should minimize the potential for plant upset due to efforts to meet an LCO in the event of a missed surveillance. The deletion of the statement regarding noted exceptions to Specification 4.0.3 is administrative since the noted exceptions do not exist. Therefore, this change does not involve a significant reduction in the margin of safety.
4. Revision to Specification 4.0.4 and associated bases
- a. The proposed change will not significantly increase the probability or consequences of an accident previously evaluated. As discussed in Item

ENCLOSURE 2 (CONTINUED)

REVISION OF TECHNICAL SPECIFICATIONS
AS A RESULT OF GENERIC LETTER 87-09

10 CFR 50.92 EVALUATION

- 3a, the potential for a plant upset and challenge to safety systems is heightened if surveillances are performed during the transition to shutdown to comply with action requirements. Generic Letter 87-09 states that it is not the intent of Specification 4.0.4 to prevent passage through or to operational modes to comply with action requirements, and it should not apply when mode changes are imposed by action requirements. Since the proposed change should reduce the potential for plant upset and challenge to safety systems, there is no significant increase in the probability or consequences of an accident previously evaluated.
- b. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated. As stated in item 4a, this change should reduce the potential for plant upset and challenge to safety systems. This change is a clarification which will facilitate conformance to action requirements when mode changes are required. Therefore, the change does not create the possibility of a new or different kind of accident from any accident previously evaluated.
- c. The proposed change does not involve a significant reduction in the margin of safety. The proposed change is a clarification which will facilitate compliance with action requirements when mode changes are required. The result should be an enhancement to plant safety in the event that inoperable equipment or an out of limit condition requires a plant shutdown. Therefore, there is no significant reduction in the margin of safety.
5. Revision of the bases for Specifications 3.0.1, 3.0.2, 3.0.3, 3.0.4, 4.0.1, 4.0.2, 4.0.3, 4.0.4, and 4.0.5
- a. The proposed change will not significantly increase the probability or consequences of an accident previously evaluated because the Technical Specification requirements have not changed (i.e., Specifications 3.0.1, 3.0.2, 3.0.3, 3.0.4, 4.0.1, 4.0.2, 4.0.3, 4.0.4, and 4.0.5). The bases associated with these requirements have simply been rewritten for clarity. Therefore, there will be no significant increase in the probability or consequences of an accident previously evaluated.

ENCLOSURE 2 (CONTINUED)

REVISION OF TECHNICAL SPECIFICATIONS
AS A RESULT OF GENERIC LETTER 87-09

10 CFR 50.92 EVALUATION

- b. The proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated. As stated in item 5a, there are no changes to the requirements proposed. The proposed change will result in improved bases for the subject specifications. Therefore, there is no possibility of a new or different kind of accident from any previously evaluated.
- c. The proposed change will not involve a significant reduction in the margin of safety because the requirements have not changed.

Conclusion

Based upon the analysis provided herein, Georgia Power Company has determined that the proposed changes 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. Therefore, the proposed changes do not involve a significant hazards consideration as defined by 10 CFR 50.92 (c).