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J. 1. Beckham, Jr. Vice President—Nucloa V Job Project



HL-2979

December 21, 1992

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

EDWIN I. HATCH NUCLEAR PLANT - UNITS 1, 2 NRC DOCKETS 50-321, 50-366 OPERATING LICENSES DPR-57, NPF-5 REQUEST TO REVISE TECHNICAL SPECIFICATIONS: <u>INSTRUMENTATION SURVEILLANCE REQUIREMENTS</u> NRC TAC Nos. M79919 and M79920

Gentlemen:

On February 4, 1992, Georgia Power Company (GPC) proposed various changes to the Plant Hatch Units 1 and 2 Technical Specifications (TS) to change various instrumentation surveillance requirements. In recent discussions with the NRC, GPC has agreed to certain revisions to our original submittal. These changes have only a minor effect on one of the significant hazards evaluations provided in our previous letter. Therefore, enclosed are the basis for the change proposed in this package, the proposed revision to the significant hazards evaluation for proposed change 1 of the submittal dated February 4, 1992, the revisions to the page change instructions, and the newly revised and hand-marked Technical Specifications pages. The changes to the hand-marked pages from our earlier letter are indicated by clouds. All other proposed revisions to the Technical Specifications and significant hazards evaluations provided in our previous letter remain unchanged.

The change to the significant hazards evaluation is due to changes in the scope of generic approvals at the NRC since the issuance of GPC's original letter. The NRC has issued their approval of GE reports GENE-770-06-01 and GENE-770-06-02 through safety evaluation reports dated July 21, 1992 and July 30, 1992, respectively. GPC's original significant hazards evaluation for proposed change 1 of the submittal dated February 4, 1992 only addressed NRC's pending approval of the reports; therefore, a minor revision to the evaluation is necessary. GPC has reviewed the conditions under which the generic approval was granted and has confirmed that the two conditions which must be met by a licensee (i.e. that the generic analysis is applicable to Plant Hatch and that any instrument setpoint drift is properly accounted for) have been satisfactorily addressed in GPC's February 4, 1992 letter.

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In accordance with the requirements of 10 CFR 50.91, a copy of this letter and all applicable enclosures will be sent to Mr. L. Barrett of the Environmental Protection Division of the Georgia Department of Natural Resources.

Mr. J. T. Beckham, Jr. states he is Vice President of Georgia Power Company and is 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 2/2 day of December 1992.

Jo Ellon Marden Notary Public Marden

CRP/crp

Enclosures:

- 1. Basis for Proposed Change
- 2. Revised 10 CFR 50.92 Evaluation
- 3. Page Change Instructions
- 4. New Technical Specifications Revised Pages
- 5. Hand-Marked Pages
- c: Georgia Power Company

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

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

U. S. Nuclear Regulatory Commission, Region 11 Mr. S. D. Ebneter, Regional Administrator Mr. L. D. Wert, Senior Resident Inspector - Hatch

State of Georgia

Mr. L. Barrett, Commissioner - Department of Natural Resource

ENCLOSURE 1

EDWIN I HATCH NUCLEAR PLANT - UNITS 1,2 NRC DOCKET 50-321 AND 50-366 OPERATING LICENSES DPR-57 AND NPF-5 REQUEST TO REVISE TECHNICAL SPECIFICATIONS: INSTRUMENTATION SURVEILLANCE REQUIREMENTS

BASIS FOR PROPOSED CHANGE

Proposed Change:

Since the issuance of GPC's original letter on February 4, 1992, the NRC has approved GE reports GENE-770-06-01 and GENE-770-06-02. In the significant hazards evaluation supplied in the February 4, 1992 letter, those reports were not identified as being approved. Accordingly, the significant hazards evaluation has been updated to reflect the current status of those reports.

In addition, the NRC identified certain changes to the Technical Specifications pages to fully reflect the NRC's approval scope of those new reports. The changes were to change the monthly surveillance frequency for the reactor steam dome pressure permissive for the low-low set logic, the reactor vessel water level 2 trip for the ATWS pump trip logic, and the reactor vessel high pressure permissive from monthly to quarterly. In addition, the NRC requested that GPC add the above GENE reports to the references in the basis for Unit 1.

Basis for Proposed Change:

The NRC issued safety evaluation reports (SERs) for GE reports GENE-770-06-1 and GENE-770-06-02 on July 21, 1992 and July 30, 1992, respectively. Those reports cover the instrument functions identified above which were not included in the original letter.

The NKC requested that applicants using these reports confirm the applicability of the generic analysis of these reports to their plant and that any increase in instrument drift due to the extended surveillance test intervals (STIs) be properly accounted for in the setpoint calculation methodology. GPC, in its letter of February 4, 1992, confirmed these conditions for the proposed instruments. For the newly identified instruments above, GPC confirms that this generic analysis is applicable to the Hatch design and that the increase in instrument drift has been properly accounted for in the calculation methodology.

ENCLOSURE 2

EDWIN I HATCH NUCLEAR PLANT - UNITS 1,2 NRC DOCKET 50-321 AND 50-366 OPERATING LICENSES DPR-57 AND NPF-5 REQUEST TO REVISE TECHNICAL SPECIFICATIONS: INSTRUMENTATION SURVEILLANCE REQUIREMENTS

REVISED 10 CFR 50.92 EVALUATION

Proposed Change:

The proposed change, from GPC's original letter of February 4, 1992, revises various instrumentation channel functional test frequencies from monthly to quarterly. The change also provides for extended AOTs for surveillance (6 hours) and repair (12 hours), with one or more channels of one subsystem removed from service.

Evaluation of Proposed Change:

GPC has reviewed the proposed change and has determined its adoption would 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.

GC Topical Reports NEDC-30936P-A, NEDC-31677P-A, NEDC-30851P-A (Supplement 1), GENE-770-06-1, and GENE-770-06-2 provide a probabilistic basis for extending ECCS and isolation actuation instrumentation surveillance intervals with no significant increase in the probability or consequences of an accident previously evaluated. These reports have been generically endorsed by the NRC. Adoption of these enhancements will provide a more consistent and correct system of ECCS and isolation actuation surveillances for both Plant Hatch units. GPC has reviewed Plant Hatch's specific design and determined the GE Topical Reports envelope the Plant Hatch design. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

No change is being made to degrade the design, operation, or maintenance of the plant; therefore, no new failure modes are being created. Therefore, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

ENCLOSI/RE 2

EDWIN I HATCH NUCLEAR PLANT - UNITS 1,2 NRC DOCKET 50-321 AND 50-366 OPERATING LICENSES DPR-57 AND NPF-5 REQUEST TO REVISE TECHNICAL SPECIFICATIONS: INSTRUMENTATION SURVEILLANCE REQUIREMENTS

REVISED 10 CFR 50.92 EVALUATION

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

The referenced GE Topical Reports provide results indicating the requested interval extensions will not negatively affect the functional capability or reliability of the affected systems. Also, GPC has determined setpoint calculations for the affected instrumentation will not be affected by these changes. Therefore, the proposed amendment does not involve a significant reduction in a margin of safety.

ENCLOSURE 3

EDWIN I. HATCH NUCLEAR PLANT - UNITS 1, 2 NRC DOCKETS 50-321, 50-366 OPERATING LICENSES DPR-57, NPF-5 REQUEST TO REVISE TECHNICAL SPECIFICATIONS: INSTRUMENTATION SURVEILLANCE REQUIREMENTS

REVISED PAGE CHANGE INSTRUCTIONS

The proposed changes to the Plant Hatch Units 1 and 2 Technical Specifications will be incorporated as follows:

	Page	Instruction
UNIT 1	i vii viii 3.1-6 3.1-15 3.1-16 3.1-17 3.1-18 Figure 4.1-1 3.2-1 3.2-2 3.2-3a 3.2-3b 3.2-3b 3.2-3b 3.2-3b 3.2-4 3.2-3b 3.2-4 3.2-5 3.2-6 3.2-7 3.2-8 3.2-9 3.2-9a 3.2-9a 3.2-10 3.2-10 3.2-11 3.2-14 3.2-16a 3.2-17 3.2-19 3.2-20 3.2-20 3.2-21	Replace Replace

REQUEST TO REVISE TECHNICAL SPECIFICATIONS: INSTRUMENTATION SURVEILLANCE REQUIREMENTS

REVISED PAGE CHANGE INSTRUCTIONS

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Page	Instruction
3.2-23	Replace
3.2-23a	Replace
3.2-23b	Replace
3.2-23d	Replace
3.2-24	Replace
3.2-25	Replace
3.2-25a	Replace
3.2-26	Replace
3.2-27	Replace
3.2-28	Replace
3.2-29	Replace
3.2 30	Replace
3.2-31	Replace
3.2-33	Replace
3,2-35	Replace
3.2-38	Replace
3.2-40	Replace
3.2-42	Replace
3.2-43	Replace
3.2-45	Replace
3.2-46	Replace
3.2-47	Replace
3.2-49c	Replace
3.2-50	Replace
3.2-52	Replace
3.2.52a	Replace
3.2.52b	Rcplace
3.2-53	Replace
3.2-54	Replace
3.2-55	Replace
3.2-56	Replace
3.2-57	Replace
3.2-60	Replace
3.2-69	Replace
3.2-70	Replace

UNIT 1

E3-2

REQUEST TO REVISE TECHNICAL SPECIFICATIONS: INSTRUMENTATION SURVEILLANCE REQUIREMENTS

REVISED PAGE CHANGE INSTRUCTIONS

Page	Instruction
3.2-71	Replace
Figure 4.2-1	Replace
3.5-11	Replace
3.6-9	Replace
3.6-9a	Replace
3.9-4	Replace
3.14-1	Replace
3.14-9	Replace
3.14-10	Replace

Unit 1

REQUEST TO REVISE TECHNICAL SPECIFICATIONS: INSTRUMENTATION SURVEILLANCE REQUIREMENTS

REVISED PAGE CHANGE INSTRUCTIONS

UNIT 2

Page	Instruction
3/4 1-8	Replace
3/4 1-17	Replace
3/4 3-1	Replace
3/4 3-5	Replace
3/4 3-5a	Add
3/4 3-9	Replace
3/4 3-9a	Add
3/4 3-15	Replace
3/4 3-15a	Add
3/4 3-21	Replace
3/4 3-22	Replace
3/4 3-23	Replace
3/4 3-24	Replace
3/4 3-31	Replace
3/4 3-32	Replace
3/4 3-33	Replace
3/4 3-34	Replace
3/4 3-36	Replace
3/4 3-37	Replace
3/4 3-38	Replace
3/4 3-39	Replace
3/4 3-41	Replace
3/4 3-43	Replace
3/4 3-47	Replace
3/4 3-50	Replace
3/4 3-53	Replace
3/4 3-54	Replace
3/4 3-56	Replace
3/4 3-56a	Add
3/4 3-58	Replace
3/4 3-58b	Replace
3/4 3-58d	Replace
3/4 3-60a	Replace
3/4 3-60f	Replace
3/4 3-63	Replace
3/4 3-66	Replace
3/4 3-66a	Replace

REQUEST TO REVISE TECHNICAL SPECIFICATIONS: INSTRUMENTATION SURVEILLANCE REQUIREMENTS

REVISED PAGE CHANGE INSTRUCTIONS

Page	Instruction
3/4 3-69	Replace
3/4 3-70	Replace
3/4 3-72	Replace
3/4 3-75	Replace
3/4 4-4	Replace
3/4 4-4a	Replace
3/4 4-5	Replace
3/4 5-4	Replace
3/4 5-10	Replace
3/4 6-12	Replace
3/4 9-3	Replace
8 3/4 3-1	Replace

UNIT 2