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

January 22, 1993

ELV-03945

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
ADDITION OF LOAD SEQUENCER SPECIFICATION

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.

This amendment modifies the Technical Specifications by adding requirements for the load sequencer. The addition of this item will clarify the actions to be taken if a sequencer is temporarily out of service and avoid the possibility of an unnecessary plant shutdown due to specification 3.0.3.

Georgia Power Company requests approval of this change by the end of July 1993.

The proposed changes and the bases for the changes are described in enclosure 1 to this letter. Enclosure 2 provides an evaluation pursuant to 10 CFR 50.92 showing that the proposed changes do not involve significant hazards considerations. Instructions for incorporation of the proposed changes into the Technical Specifications and a markup of the affected pages are provided in enclosure 3.

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

290024

A001
1/1

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 22nd day of January 1993.

Mary M. Bentley
Notary Public

CKM/HWM/gmb

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. Ebneter, 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, Dept. of Natural Resources

ENCLOSURE 1

VOGTLE ELECTRIC GENERATING PLANT
REQUEST TO REVISE TECHNICAL SPECIFICATIONS
ADDITION OF LOAD SEQUENCER

BASIS FOR PROPOSED CHANGE

Proposed Change

The revision will add the following requirement to limiting condition for operation (LCO) 3.8.1.1:

"c. Automatic load sequencers for train A and B"

The associated action statement will be amended by adding the following requirement:

"g. with one automatic load sequencer inoperable, restore the inoperable load sequencer to OPERABLE status within 12 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours."

The following sentence will be added to action statements 14, 20, and 23 of table 3.3-3:

"(With channels inoperable due to an inoperable load sequencer, apply the ACTION statement of specification 3.8.1.1 for an inoperable load sequencer.)"

The following paragraph will be inserted into the bases section for specification 3.8.1.1:

"The ACTION times specified for an inoperable automatic load sequencer are based on the times allowed when a combination of one diesel generator and one offsite circuit is inoperable. This conservatively addresses any consequential effects of an inoperable load sequencer on other engineered safety features and avoids having to evaluate the ACTION based on table 3.3-2."

Basis

Although engineered safety features are sequenced into operation through the load sequencer following an accident, the Technical Specifications do not have a specific specification for the load sequencer. Surveillance and operability requirements are covered by the specifications for engineered safety features (ESF) instrumentation and electrical power systems. This leaves a question concerning the appropriate actions to take in the event that a load sequencer must be taken out of service or becomes inoperable. Therefore, an additional specification is being proposed that will clearly delineate the appropriate actions. This will reduce the possibility for a Technical Specification application error.

VOGTLE ELECTRIC GENERATING PLANT
REQUEST TO REVISE TECHNICAL SPECIFICATIONS
ADDITION OF LOAD SEQUENCER

BASIS FOR PROPOSED CHANGE

The proposed specification is contained in enclosure 3. It is not a result of any plant changes in design or operation. Enclosure 2 provides an evaluation to demonstrate that the proposed specification will not involve any significant hazards considerations.

ENCLOSURE 2

VOGTLE ELECTRIC GENERATING PLANT
REQUEST TO REVISE TECHNICAL SPECIFICATIONS
ADDITION OF LOAD SEQUENCER

10 CFR 50.92 EVALUATION

Pursuant to 10 CFR 50.92, Georgia Power Company has evaluated the proposed revision to the Technical Specifications and has determined that operation of the facility in accordance with the proposed amendment would not involve any significant hazards considerations.

Background

The load sequencer automatically starts the diesel and connects Class 1E loads to the 4.16-kV bus following an accident or a loss of offsite power (LOSP). In the event of an accident the diesel generator for each train of emergency power is started but is not connected to the 4.16-kV bus unless an undervoltage condition occurs. The instrumentation used to actuate the engineered safety features is identified in table 3.3-2 of the Technical Specifications. The load sequencer is not specifically listed in this table although its operability may be implied. Currently, if the load sequencer is inoperable it is necessary to evaluate the appropriate actions based on table 3.3-2 for inoperable engineered safety features actuation system instrumentation. Current plant practice is to refer to action statements 14, 20 and 23. The addition of a sentence in these action statements that refers to the action statement of specification 3.8.1.1 will help avoid confusion concerning the appropriate action when a sequencer is inoperable. The purposes of the addition of this specification are to identify the appropriate action to take when a sequencer is inoperable, to avoid the application of specification 3.0.3 and to avoid having to evaluate the effects of an inoperable sequencer on instrumentation listed in table 3.3-2.

Analysis

This addition to the Technical Specifications is not the result of any design change or change in operating procedures or requirements. Specific surveillance requirements for the load sequencers are already included in Specification 4.8.1.1.2.h.4, 6, and 12. Therefore, it is not necessary to provide an additional surveillance requirement for the new limiting condition for operation (LCO) and action statement. The change will eliminate any confusion that might exist concerning the effects of an inoperable load sequencer on instrumentation listed in table 3.3-2. When a load sequencer is inoperable the safety related loads for the train served by that sequencer may not load as assumed in the safety analyses, even if the preferred offsite power or the onsite power sources are available for that train. The Technical Specifications already contain appropriate

actions to take in the event of the unavailability of both the preferred offsite and onsite power sources for a train. The severity of such a condition will be greater than the effects of an inoperable sequencer. Therefore, the proposed 12-hour action time for an inoperable sequencer was conservatively chosen to be the same as when an offsite power source and diesel generator are inoperable. This assures that the level of protection provided by the Technical Specifications is not reduced by the addition of this requirement. The proposed LCO and action statements are consistent with the proposed requirements in NUREG-1431, revision 0, the new standard Technical Specifications for Westinghouse plants. Although the load sequencer is not required for automatically connecting loads to the 4.16-kV buses during Modes 5 and 6, it does function to automatically start the diesel generator on a loss of offsite power. This function is required for diesel generator operability; therefore, no specific sequencer LCO is needed for Modes 5 and 6.

Conclusion

Based on the above considerations, GPC has concluded the following concerning 10 CFR 50.92.

1. The proposed revision to the Technical Specifications does not involve a significant increase in the probability or consequences of an accident previously evaluated because the action to be taken when a load sequencer is inoperable is consistent with an already specificed condition that is more signficant than an inoperible sequencer, namely, the loss of an entire train of emergency power.

2. The proposed revision to the Technical Specifications does not create the possibility of a new or different kind of accident from any accident previously evaluated because it does not involve any change to the design, operation, or performance of the load sequencer. It only serves to clearly identify the appropriate conservative response to an inoperable load sequencer.

3. The proposed addition to the Technical Specifications does not involve a significant reduction in a margin of safety because the proposed action to take when a sequencer is not operable is the same as the action already required by the Technical Specifications when no power is available to the entire train.

Based upon the preceding information, it has been determined that the proposed Technical Specifications revision does not involve a significant hazards consideration as defined by 10 CFR 50.92(C).