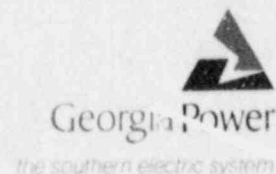


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December 22, 1987

U. S. Nuclear Regulatory Commission
Region II - Suite 2900
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Atlanta, GA 30323

ATTENTION: Dr. J. N. Grace

PLANT HATCH -- UNIT 2
NRC DOCKET 50-366
OPERATING LICENSE NPF-5
TECHNICAL SPECIFICATION REQUIREMENTS FOR
REACTOR WATER CLEANUP SYSTEM ISOLATION
ON HIGH DIFFERENTIAL FLOW

Gentlemen:

This letter serves to confirm a relief request to Technical Specification (TS) requirements for Plant Hatch Unit 2, as discussed with the NRC staff on December 18 and 21, 1987. Specifically, temporary relief is requested from the Plant Hatch Unit 2 TS response time requirements for reactor water cleanup high differential flow isolation instrumentation. This temporary relief will be in effect during the time frame necessary for submittal and NRC review of a permanent TS change.

Unit 2 TS Table 3.3.2-3 provides instrumentation response time requirements for isolation actuation instrumentation. The isolation actuation instrumentation response time, as provided by Note (*) to this Table, is a subset of the ISOLATION SYSTEM RESPONSE TIME, and is that time interval from when the monitored parameter exceeds its isolation actuation setpoint at the channel sensor until the isolation valve actuator receives a signal to close.

Item 3.a of the above Table addresses instrumentation which isolates the RWCU system on system high differential flow, and provides an instrumentation response time requirement of less than or equal to 13 seconds for this function. However, the circuit for the high differential flow isolation signal contains a timer such that the high differential flow signal must be present for 45 seconds before a valve isolation signal is generated. In light of the above definition, the presence of the timer can be interpreted to conflict with the 13 second

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instrumentation response time requirement provided by Table 3.3.2-3. In the event that this response time cannot be demonstrated, Specification 3.3.2, through Table 3.3.2-1, requires isolation of the RWCU system. However, since this would cause undesirable effects on reactor water chemistry, GPC requests that relief from Item 3.a of Table 3.3.2-3 be granted while a permanent change clarifying the TS is processed by GPC and reviewed by NRC.

In the past, GPC has interpreted the 13 seconds to be the instrumentation response time exclusive of the time delay, and has bypassed the time delay relay for performance of the response time test. The 45 second time delay has been considered part of the process variable. That is, in order for a differential flow signal to be valid, it must be present for a specific time prior to generation of the isolation signal. The 45 second time delay is a standard design feature of this particular isolation function and is required to prevent RWCU isolations due to spurious signals that may be generated during reactor startup and shutdown, instrument testing, pump start, or demineralizer changeout.

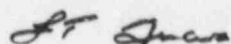
Operation with the time delay in place has been analyzed and found to have no unacceptable safety impact. The Accident Analysis does not assume functioning of the RWCU high differential flow isolation system. Containment isolation in the event of a pipe break in RWCU is provided by one of the following Class 1E circuits meeting all applicable criteria for redundancy, separation, etc.: Reactor Vessel Water Level Low Low, RWCU Area Temperature High, or RWCU Area Ventilation Differential Temperature High. The RWCU high differential flow isolation is a single channel system provided for leak before break protection. General Electric's letter to GPC of December 16, 1987, states that "...Because the set point is for leak before break and is, therefore, a precursor to line break protection given by reactor water level signals, the time delay before the set point is not part of that accident analysis. Rather, it serves as a system operation buffer to prevent operation transients when no real leak exists, but a trip signal does. The time delay reflects a conservative measure of how fast a line crack may propagate to a total cross section break after the technical specification value for the leak rate is exceeded..."

This design feature appears in NRC approved BWR Standard Technical Specifications (NUREG 0123 Revision 3), and GPC will seek permanent TS changes in accordance with the BWR STS requirements.

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If you have any questions in this regard, please contact this office at any time.

Sincerely,



L. T. Gucwa

REB/lc

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