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February 9, 1988

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

PLANT HATCH - UNIT 2
NRC DOCKET 50-366
OPERATING LICENSE NPF-5
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
REACTOR WATER CLEANUP ISOLATION ON HIGH DIFFERENTIAL FLOW

Gentlemen:

In accordance with the provisions of 10 CFR 50.90, as required by 10 CFR 50.59(c)(1), Georgia Power Company hereby proposes a change to the Plant Hatch Unit 2 Technical Specifications, Appendix A to Operating License NPF-5.

The proposed change would add a footnote to Table 3.3.2-3, Isolation System Instrumentation Response Time, to indicate that the instrumentation which provides reactor water cleanup system isolation on high system differential flow (Item 3.a. of the above Table) contains a 45 second time delay function.

Enclosure 1 provides a detailed description of the proposed change and the basis for the change.

Enclosure 2 details the basis for our determination that the proposed change does not involve a significant hazards consideration.

Enclosure 3 provides page change instructions for incorporating the proposed change into the Unit 1 Technical Specifications.

The proposed changed Technical Specifications pages follow Enclosure 3.

Payment of the filing fee in the amount of one hundred and fifty dollars is enclosed.

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c: Georgia Power Company
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GO-NORMS

U. S. Nuclear Regulatory Commission, Washington
Mr. L. P. Crocker, Licensing Project Manager - Hatch

U. S. Nuclear Regulatory Commission, Region II
Dr. J. N. Grace, Regional Administrator
Mr. P. Holmes-Ray, Senior Resident Inspector - Hatch

State of Georgia
Mr. J. L. Ledbetter

ENCLOSURE 1

PLANT HATCH - UNIT 2
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REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
REACTOR WATER CLEANUP ISOLATION ON HIGH DIFFERENTIAL FLOW
BASIS FOR CHANGE REQUEST

Georgia Power Company has been requested by NRC to provide clarifying changes to the Plant Hatch Unit 2 Technical Specifications (TS) in order to indicate the presence of a timer in the logic and instrumentation which isolates the reactor water cleanup (RWCU) system due to high differential flow conditions. The change hereby proposed will result in a description identical to that provided in NRC approved BWR Standard Technical Specifications (NUREG 0123 Revision 3) for this common BWR design feature. This change is clarifying in nature and does not represent a change to the design or operation of the plant as described in the FSAR. NRC Region II, by letter of December 29, 1987, granted enforcement discretion to GPC with regard to this matter, for that time period necessary for processing and approval of this TS change.

Plant Hatch Unit 2 Technical Specifications (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 high system 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, and without the explanatory note normally found in BWR STS, the presence of the timer has been interpreted by NRC as conflicting with the 13 second instrumentation response time requirement provided by Table 3.3.2-3.

GPC proposes to incorporate an explanatory footnote to Table 3.3.2-3, indicating the presence of the timer and the duration of the time delay. As noted, this footnote is identical to that provided in BWR STS for this common BWR design feature.

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
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BASIS FOR CHANGE REQUEST

The time delay for this particular isolation function 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. Adverse effects of these spurious RWCU isolations include reactor coolant conductivity excursions and unnecessary challenges to the isolation system.

The time delay feature has been present since Plant Hatch Unit 2 was built and was previously 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 for accident analysis RWCU pipe breaks 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..."

As has been our past practice, GPC will continue to consider the 13 second maximum instrumentation response time to be exclusive of the time delay, and will bypass the time delay relay for performance of the response time test. We will additionally test the time delay function to ensure that the time delay does not exceed 45 seconds.

ENCLOSURE 2

PLANT HATCH - UNIT 2
NRC DOCKET 50-366
OPERATING LICENSE NPF-5
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
REACTOR WATER CLEANUP ISOLATION ON HIGH DIFFERENTIAL FLOW
10 CFR 50.92 EVALUATION

Pursuant to the requirements of 10 CFR 50.92, Georgia Power Company has evaluated the proposed amendment for Plant Hatch Unit 2 and has determined that its adoption would not involve a significant hazards consideration. The basis for this determination is as follows:

Proposed Change:

Georgia Power Company has been requested by NRC to provide clarifying changes to the Plant Hatch Unit 2 Technical Specifications (TS) in order to indicate the presence of a timer in the logic for instrumentation which isolates the reactor water cleanup (RWCU) system due to high differential flow conditions. It is proposed to add a footnote to Table 3.3.2-3, relative to Item 3.a, denoting the existence of the timer and the duration of the time delay.

Basis:

The change hereby proposed will result in a description identical to that provided in NRC approved BWR Standard Technical Specifications (NUREG 0123 Revision 3) for this common BWR design feature. This change is clarifying in nature and does not represent a change to the design or operation of the plant as described in the FSAR.

The proposed change does not involve a significant increase in the probability or consequences of an accident because no changes to plant operation or design are involved. This change clarifies a design feature of a plant leak detection system for which no credit is taken in the accident analysis. Containment isolation for accident analysis RWCU pipe breaks 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. The 45 second time delay is commensurate with this function and is a standard BWR design feature.

The possibility of a different kind of accident from those analyzed previously is not created by this change, since the design function of systems, as described in the FSAR, is not affected.

ENCLOSURE 2 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
REACTOR WATER CLEANUP ISOLATION ON HIGH DIFFERENTIAL FLOW
10 CFR 50.92 EVALUATION

Margins of safety are not significantly reduced by this change. No change to plant design or operation is involved. This change is clarifying in nature and has no impact on margins of safety.

ENCLOSURE 3

PLANT HATCH - UNIT 2
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OPERATING LICENSE NPF-5
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PAGE CHANGE INSTRUCTIONS

The proposed changes to the Technical Specifications (Appendix A to Operating License NPF-5) would be incorporated as follows:

<u>Remove Page</u>	<u>Insert Page</u>
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3/4 3-20	3/4 3-20