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Georgia Power
the southern electric system

C. K. McCoy
Vice President, Nuclear
Vogtle Project

LCV-0956

January 20, 1997

Docket Nos. 50-424
50-425

TAC- M92131
M92132

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

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT
UNIT 1 AND UNIT 2 IMPROVED TECHNICAL SPECIFICATIONS
COMMENTS ON NRC SAFETY EVALUATION REPORT

By letter dated September 25, 1996, the NRC issued Amendments 96 and 74 to the Unit 1 and Unit 2 operating licenses, respectively. These amendments were in response to our application dated May 1, 1995, as supplemented by letters dated August 3 and 9, September 22, November 20, and December 21, 1995, January 26 and 30, February 19 and 29, March 5 and 12, May 6, June 17, August 23, and September 13, 1996. The amendments replaced the current Technical Specifications (TS) with a set based on Revision 1 to NUREG-1431, "Standard Technical Specifications Westinghouse Plants," hereafter referred to as the Improved TS or ITS.

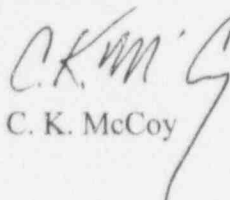
In preparation for implementation of the ITS, Georgia Power Company (GPC) has reviewed the NRC Safety Evaluation (SE) in support of the amendments that issued the ITS. As a result of that review, GPC has identified certain areas that require clarification; specifically with respect to the disposition and control of requirements and information relocated or removed from the current TS. The attached table identifies each item of concern in the SE and the GPC disposition of each item.

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GPC requests that the NRC review the attached table, and if necessary revise the SE appropriately.

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Sincerely,


C. K. McCoy

U. S. Nuclear Regulatory Commission

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CKM/NJS

Attachment

xc: Georgia Power Company
Mr. J. B. Beasley, Jr.
Mr. M. Sheibani
NORMS

U. S. Nuclear Regulatory Commission
Mr. L. A. Reyes, Regional Administrator
Mr. L. L. Wheeler, Licensing Project Manager, NRR
Mr. C. R. Ogle, Senior Resident Inspector, Vogtle

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GPC Clarification With Respect to NRC SE for VEGP ITS

Page & Paragraph	SE Section	Applicable Excerpt from SE	GPC Clarification
Pg. 9; first full paragraph	III Evaluation - Less Restrictive Requirements	<p>“(In its application, the licensee affirmed its existing commitment to the NRC to evaluate all changes to plant procedures required by Improved TS 5.4.1, “Procedures, “ (corresponding to current TS 6.7.1.a, 6.7.1.b, 6.7.1.g, 6.7.1.h) against the unreviewed safety question criteria of 10 CFR 50.59 and to obtain prior NRC approval of changes to any of these procedures that may involve an unreviewed safety question.)”</p>	<p>In our letter dated June 17, 1996, GPC stated the following:</p> <p>“The conversion involves relocating certain requirements and details to licensee controlled documents as reflected in the submittals referenced above. GPC will ensure that these requirements and details are appropriately reflected in these documents or that they will be included in the next required update of these documents. In some cases, information is being moved from the TS to plant procedures, and this information is not reflected in the FSAR, the procedures are not described in the FSAR, and no other regulatory requirement applies (i. e., 10 CFR 50.55(a), 50.54(a), etc.). In these cases GPC will control future changes to this information via 10 CFR 50.59. That is to say, changes to this information will <i>only</i> be made without prior Commission approval provided those changes do <i>not</i> involve a change to the TS or an unreviewed safety question.”</p> <p>Please note that the above statement applies only to the relocated information. This statement was not meant to imply that GPC will evaluate all changes to plant procedures required by Improved TS 5.4.1, “Procedures, “ (corresponding to current TS 6.7.1.a, 6.7.1.b, 6.7.1.g, 6.7.1.h) against the unreviewed safety question criteria of 10 CFR 50.59.</p>
Pg 199; first full paragraph	III.3.5 Evaluation - Relocated Requirements	<p>“The snubber inspection requirements of this specification are also part of the inservice inspection (ISI) program and are consistent with the requirements of 10 CFR 50.55a. In accordance with the requirements in 10 CFR 50.55a, ISI must be performed in accordance with ASME Section XI. This regulation and licensee commitments to the NRC for VEGP ISI contain the necessary programmatic requirements for ISI. Repeating the</p>	<p>By letter dated August 9, 1995, (LCV-0653) GPC made the following statement regarding the relocation of the snubber inspection requirements:</p> <p>“The specification for Snubbers will be relocated to the Technical Requirements Manual (TRM). Changes to the TRM will be controlled consistent with the provisions of 10 CFR 50.59 and 10 CFR 50.55a, including the approved</p>

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GPC Clarification With Respect to NRC SE for VEGP ITS

Page & Paragraph	SE Section	Applicable Excerpt from SE	GPC Clarification
		<p>requirements in the improved TS is unnecessary. Changes to the ISI program are adequately controlled by the provisions of 10 CFR 50.55a. These other requirements and the provisions of the ISI program will ensure that future changes to the CTS snubber requirements in the ISI program documents will be acceptable. Therefore, CTS 3/4.7.8 may be relocated to the TRM."</p>	<p>exemptions."</p> <p>Future changes will be controlled in accordance with 50.59 & 55a, but the current program will be the relocated requirements of the current TS 3.7.8. Current TS 3.7.8 requirements differ considerably from ASME Section XI snubber requirements. Vogtle currently has an approved relief request from ASME Section XI snubber requirements.</p> <p>The Vogtle position for the snubber program under improved TS is presented via Relief Request 43 (RR-43). (See letters dated November 17, 1995, LCV-0667 for Unit 1 and January 22, 1996, LCV-0668 for Unit 2.) The NRC response to RR-43 (March 8, 1996 and August 13, 1996, for Units 1 and 2, respectively) stated that the evaluation of RR-43 would be performed in connection with the processing of the TS amendment request seeking removal of the program (i. e., relocation of the current TS 3.7.8 requirements to the TRM). Therefore, now that the ITS has been approved by the NRC (including the relocation of current TS 3.7.8 to the TRM) GPC is expecting NRC approval of RR-43.</p>
<p>Table 1; Pg 18 of 42; Items 3.4.1.4.2, Note #, 4.4.1.4.2.2 and Action c</p>	<p>RMWST discharge valve numbers 1208-U4-175, 176, 177, and 183</p>	<p>Table 1 to the SE indicates that these valve numbers will be relocated to the FSAR.</p>	<p>By letter dated September 22, 1995, (LCV-0655) GPC proposed that valves 1208-U4-175, 176, 177, and 183 be removed from the TS so that other valves may be used in lieu of these four valves. GPC stated that the applicable valves required to isolate the unborated water sources would be controlled by plant procedures.</p>
<p>Table 1; Pg 21 of 42; Items 4.4.9.3.2.a and b</p>	<p>RHR suction valve and suction relief valve numbers.</p>	<p>Table 1 to the SE indicates that these valve numbers will be relocated to FSAR section 5.4.7.</p>	<p>Our application and supplemental letters did not specifically address the location of these valve numbers. These valve numbers already appear in various sections of the FSAR, but not in the same context as current TS 4.4.9.3.2.a and b. For the sake of completeness, GPC plans</p>

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GPC Clarification With Respect to NRC SE for VEGP ITS

Page & Paragraph	SE Section	Applicable Excerpt from SE	GPC Clarification
			to relocate these valve numbers to the ITS Bases for LCO 3.4.12 via the Bases Control Program by April 3, 1997.
Table 1; Pg 22 of 42; Item 4.5.1.2	Channel Calibration of accumulator level and pressure channels - indication only instrumentation.	Table 1 of the SE indicates that this requirement would be relocated to the FSAR.	Our revised submittal of December 21, 1995, (LCV-0603-D) states this requirement would be relocated to plant procedures.
Table 1; Pg 22 of 42; Item 4.5.2.f	Procedural details for conducting inservice testing (IST) of the ECCS pumps.	Table 1 of the SE indicates that this requirement would be relocated to the IST Program procedures implementing 5.5.8.	Our revised submittal of December 21, 1995, (LCV-0603-D) states this requirement would be relocated to plant procedures. The correct controlling requirements would be 5.5.8 and 10 CFR 50.59.
Table 1; Pg 25 of 42; Item 4.6.2.1.b	Acceptance criteria for containment spray pump differential pressure flow test.	Table 1 of the SE indicates that this requirement would be relocated to the IST Program procedures.	Our revised submittal of December 21, 1995, (LCV-0603-D) states this requirement would be relocated to plant procedures. The correct controlling requirement would be 10 CFR 50.59.
Table 1; Pg 27 of 42; Items 4.7.1.2.a.1 and 4.7.1.2.a.2	Procedural details for AFW pump testing.	Table 1 of the SE indicates that this requirement would be relocated to the IST Program procedures.	Our revised submittal of December 21, 1995, (LCV-0603-D) states this requirement would be relocated to plant procedures. The correct controlling requirement would be 10 CFR 50.59.
Table 1; Pg 30 of 42; Item 4.8.1.1.2.a.6	Requirement to verify DG is aligned to supply standby power to its associated emergency busses.	Table 1 of the SE indicates that this requirement would be relocated to FSAR section 8.3.1.1.3.H.4.	Our revised submittal of December 21, 1995, (LCV-0603-D) states this requirement would be relocated to plant procedures.
Table 1; Pg 31 of 42; Item 4.8.1.1.2.f and Note #	Details of diesel fuel oil sampling and analysis procedure (mercaptan content and neutralization number).	Table 1 of the SE indicates that this requirement would be relocated to the TRM.	Our revised submittal of December 21, 1995, (LCV-0603-D) states this requirement would be relocated to plant procedures.

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GPC Clarification With Respect to NRC SE for VEGP ITS

Page & Paragraph	SE Section	Applicable Excerpt from SE	GPC Clarification
Table 1; Pg 31 of 42; Item 4.8.1.1.2.h.9	Verification that auto-connected loads are within DG load capacity.	Table 1 of the SE indicates that this requirement would be relocated to FSAR section 8.3.1.1.3.	Our revised submittal of December 21, 1995, (LCV-0603-D) states this requirement would be relocated to plant procedures.
Table 1; Pg 31 of 42; Item 4.8.1.1.2.j.2	Pressure test of the ASME Code III fuel oil system.	Table 1 of the SE indicates that this requirement would be relocated to FSAR section 9.5.4.	In our letter dated January 30, 1996, (LCV-0603-E) we revised our submittal to state that this requirement would be relocated to plant procedures.
Table 1; Pg 32 of 42; Table 4.8-2	Electrolyte reference temperature in Note (4) and float voltage temperature correction in Note (6).	Table 1 of the SE indicates that this requirement would be relocated to the ITS Bases for LCO 3.8.6.	Our revised submittal of December 21, 1995, (LCV-0603-D) states this requirement would be relocated to the Bases and plant procedures. The correct controlling requirements would be 5.5.14 and 10 CFR 50.59.
Table 1; Pg 34 of 42; Item 3.9.2	Conditions comprising OPERABILITY of the source range monitors.	Table 1 of the SE indicates that this requirement would be relocated to the ITS Bases for LCO 3.9.3.	Our revised submittal of December 21, 1995, (LCV-0603-D) states this requirement would be relocated to the Bases and plant procedures. The correct controlling requirements would be 5.5.14 and 10 CFR 50.59.
Table 1; Pg 38 of 42; Item 6.1.2	Requirement for an annual directive from the General Manager - Nuclear emphasizing the primary responsibility of the Operations Supervisor.	Table 1 of the SE indicates that this requirement would be relocated to the FSAR.	Our revised submittal of December 21, 1995, (LCV-0603-D) states this requirement would be deleted.
Table 1; Pg 39 of 42; Item 6.6.1.a	Requirement for notification of the PRB and SRB within 24 hours of determination that a safety limit violation has occurred.	Table 1 of the SE indicates that this requirement would be relocated to the FSAR.	Our revised submittal of December 21, 1995, (LCV-0603-D) states this requirement would be deleted based on PRB and SRB review of the LER and the retention of the requirement in Technical Specifications that the General-Manager and Vice President be notified within 24 hours of the determination that a safety limit violation occurred.