



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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MARCH 30 1979

Docket No. 50-366

Mr. Charles F. Whitmer
Vice President - Engineering
Georgia Power Company
P. O. Box 4545
Atlanta, Georgia 30302

Dear Mr. Whitmer:

By your letter dated December 1, 1978, you proposed Technical Specification changes for settlement of Class 1 structures on Hatch Nuclear Plant Unit No. 2. During the course of our review we have determined that the additional information identified in Enclosure 1 is required.

Our review has identified a significant item of difference between the staff's requirement and your submittal. This difference relates to the currently approved specification which requires shutdown should the field measured settlements exceed the allowable settlement values. Your requested amendment would delete shutdown action based on your statement that this requirement is unnecessary and overly severe because of the slow pace at which settlement could be expected to occur and where remedial action could be taken. The staff's position on this item is indicated in Enclosure 2.

In order to provide for timely completion of our review we request that a revised submittal which includes the additional information identified in Enclosure 1 be provided within 30 days of your receipt of this letter. Further, your submittal should include a revised Technical Specification as discussed in Enclosure 2 or justification for deviating from the staff position.

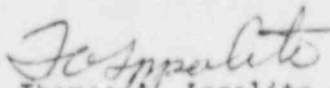
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Mr. Charles F. Whitmer

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Should you have any questions, please contact us.

Sincerely,



Thomas A. Ippolito, Chief
Operating Reactors Branch #3
Division of Operating Reactors

Enclosures:

1. Request for Additional Information
2. Staff Position on Technical Specification change request

cc w/enclosures:
see next page

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Oglethorpe Electric Membership Corporation
Municipal Electric Association of Georgia
City of Dalton, Georgia

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ENCLOSURE 1

REQUEST FOR ADDITIONAL INFORMATION

GEORGIA POWER COMPANY

EDWIN I. HATCH NUCLEAR PLANT UNIT NO. 2

"SETTLEMENT OF CLASS I STRUCTURES"

1. The labeling of benchmarks on submitted settlement records (FSAR, Fig. 2A-16A, sheet 1 through 5) should be revised and resubmitted to permit correlation with new benchmark designations indicated on the proposed Technical Specification Tables.
2. Provide the surveyed reference elevations for each benchmark in Table 3.7.8.2-1. Provide the results of the comparison which was made between allowable versus measured settlement that is discussed in Paragraph 4.3 (Enclosure to Georgia Power December 1, 1978 letter entitled, "Supporting Information for Proposed Technical Specifications, Settlement of Class I Structures"). We request the actual computations which established the allowable differential settlement in Table 3.7.8.2-1 between benchmarks 1 and 2 (0.033') and benchmarks 1 and 3 (0.139').
3. Many of the allowable differential settlement values estimated for the Control Building, Turbine Building, Diesel Generator Building and Intake Structure are so large because of the adopted settlement criteria that they exceed total predicted settlement values where notification of the NRC would have been required. We recommend in order to highlight the controlling settlement criteria that an explanatory note be added to distinguish those allowable differential settlement values in Table 3.7.8.2-1 which are superseded by a more limiting settlement criteria. The referenced note should indicate what Technical Specification Table contains the controlling settlement value.

ENCLOSURE 2
STAFF POSITION ON
SETTLEMENT OF CLASS I STRUCTURES
EDWIN I. HATCH NUCLEAR PLANT UNIT NO. 2

Position:

The NRC staff requires the following statement be added to Sections 3.7.8.2, 3.7.8.3 and 3.7.8.4 of the Technical Specifications under heading ACTION:

"With the differential settlement of any structure exceeding the allowable differential settlement value of Table (insert appropriate table), be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the next 24 hours".

The addition of this statement is not required in Section 3.7.8.1.

Discussion:

1. Computations establishing the allowable differential settlement values in the Technical Specification tables are based on somewhat conservative but reasonable design assumptions. These settlements, if exceeded because of unanticipated conditions, could result in undesirable distress to Class I structures and conduits. The current trend reflected by actual field settlement measurements indicates that settlements have leveled off and that the proposed allowable values should not be experienced during the years of plant operation. However, if unanticipated foundation conditions were to develop and result in an unusual resumption of settlement, it is the staff's position that there should be a maximum settlement limit beyond which shutdown and physical inspection of Class I pipelines, connections, and structures would be required.
2. The Technical Specifications as proposed by the licensee require an engineering review and evaluation for submittal to the NRC if the measured differential settlement exceeds 75% of the allowable settlement value. It is the staff's position that the results of this study could permit shutdown to be avoided if a reasonable explanation for the continuing settlement were provided and remedial action was shown not to be necessary.
3. The requirement for shutdown strongly encourages both the licensee and NRC to address an unanticipated developing settlement problem in a timely manner. Lengthy technical studies requiring detailed review while the settlement problem goes unabated should be avoided.