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LCV-1149-A

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Docket Nos. 50-424
50-425

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

Ladies and Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT
REQUEST TO REVISE TECHNICAL SPECIFICATIONS
CONTAINMENT PENETRATIONS AND CONTAINMENT
VENTILATION ISOLATION INSTRUMENTATION

By letter dated June 26, 1998. (LCV-1149) Southern Nuclear Operating Company (SNC) proposed to revise the Vogtle Electric Generating Plant (VEGP) Unit 1 and Unit 2 Technical Specifications (TS) Limiting Condition for Operation (LCO) 3.3.6, Containment Ventilation Isolation Instrumentation, and LCO 3.9.4, Containment Penetrations. In addition, as an administrative matter SNC proposed to delete LCO 3.7.6a, Condensate Storage Tank (CST) - (Non-redundant CSTs). As discussed in LCV-1149, LCO 3.7.6a was a temporary requirement pending completion of certain design modifications. However, the evaluation provided pursuant to 10 CFR 50.92 in support of the proposed changes failed to explicitly discuss the proposed deletion of LCO 3.7.6a. Therefore, SNC is providing a revised evaluation pursuant to 10 CFR 50.92, which includes a discussion of the proposed deletion of LCO 3.7.6a.

Sincerely,

J. B. Beasley, Jr.

JBB/NJS

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Enclosure

xc: Southern Nuclear Operating Company
Mr. J. T. Gasser
Mr. M. Sheibani
NORMS

U. S. Nuclear Regulatory Commission
Mr. L. A. Reyes, Regional Administrator
Mr. D. H. Jaffe, Senior Project Manager, NRR
Mr. John Zeiler, Senior Resident Inspector, Vogtle

State of Georgia
Mr. L. C. Barrett, Commissioner, Department of Natural Resources

Enclosure

Vogtle Electric Generating Plant Request to Revise Technical Specifications Containment Penetrations and Containment Ventilation Isolation Instrumentation

Significant Hazards Consideration Evaluation

Proposed Change

In accordance with the requirements of 10 CFR 50.90, Southern Nuclear Operating Company (SNC) proposes to revise the Vogtle Electric Generating Plant (VEGP) Unit 1 and Unit 2 Technical Specifications (TS) Limiting Condition for Operation (LCO) 3.3.6, Containment Ventilation Isolation Instrumentation, and LCO 3.9.4, Containment Penetrations. In addition, this submittal includes changes to the Bases appropriate to the proposed changes to the TS.

The proposed changes are as follows:

- The Applicability of LCO 3.3.6 would be revised to refer to Table 3.3.6-1, and Table 3.3.6-1 would be revised to add a column entitled "APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS". Then, the applicable modes for Manual Initiation, Automatic Actuation Logic and Actuation Relays, and Safety Injection would be revised to include *only* Modes 1, 2, 3, and 4. This has the effect of eliminating the requirement that system level manual initiation, automatic actuation logic and actuation relays, and safety injection initiation be operable during core alterations and/or during movement of irradiated fuel assemblies within containment. Consistent with this proposed change, LCO 3.3.6, Condition C and Required Action C.2 would be revised to reflect that system level manual initiation and automatic actuation would not be required during core alterations and/or during movement of irradiated fuel assemblies within containment. Appropriate Bases changes are included to reflect the proposed changes.
- LCO 3.9.4 would be revised to allow the equipment hatch and the emergency airlock to be open during core alterations and/or during movement of irradiated fuel assemblies within containment. In addition, the LCO statement would be revised to reflect that containment ventilation isolation (CVI) would be accomplished by manually closing the individual CVI valves as opposed to a system level manual or automatic initiation, consistent with the proposed change to LCO 3.3.6. The Surveillance Requirements (SRs) would be revised to reflect the proposed change to CVI and to reflect that the equipment hatch would be allowed to be open. Appropriate Bases changes are included to reflect the proposed changes.
- As an administrative matter, SNC notes that existing LCO 3.7.6a, Condensate Storage Tank (CST) - (Non-redundant CSTs) was created to address a design condition that rendered the CSTs non-redundant. A note was included with LCO 3.7.6a that stated that this LCO was only applicable to the Unit(s) which have not completed a design modification required for redundant CSTs. The necessary design modifications are now complete for both units. Therefore, in accordance with the note to the LCO, LCO 3.7.6a is no longer applicable to either unit, and SNC is proposing to delete LCO 3.7.6a, and LCO 3.7.6 would be revised to delete the words "Redundant CSTs" from the title.

Enclosure

Vogtle Electric Generating Plant Request to Revise Technical Specifications Containment Penetrations and Containment Ventilation Isolation Instrumentation

Significant Hazards Consideration Evaluation

Evaluation

The proposed changes have been evaluated against the criteria of 10 CFR 50.92 as follows:

1. Do the proposed changes involve a significant increase in the probability or consequences of an accident previously evaluated?

No. The proposed changes would revise the VEGP Unit 1 and Unit 2 TS by removing requirements for automatic and system level manual containment ventilation isolation, and allow the emergency air lock and the equipment hatch to be open during core alterations and movement of irradiated fuel assemblies inside containment. The containment penetrations affected by the proposed changes are not initiators for any accident previously evaluated. Allowing these penetrations to be open under the conditions specified will not affect the probability of any accident previously evaluated.

The existing VEGP TS allow the personnel air lock doors to be open during core alterations and movement of irradiated fuel assemblies inside containment. The radiological consequences of a fuel handling accident inside containment have been determined to be below the Standard Review Plan (SRP) section 15.7.4 criteria and General Design Criteria (GDC) 19 criteria with the personnel air lock doors open. The proposed changes will not alter these previously determined consequences. The existing dose analysis bounds the proposed changes. Therefore, the proposed changes will not increase the consequences of any accident previously evaluated.

The proposed deletion of LCO 3.7.6a is an administrative change only. The requirements of LCO 3.7.6a applied only during the time that the condensate storage tanks (CSTs) were not redundant. Due to the implementation of design changes which make the CSTs redundant for each unit, the requirements of LCO 3.7.6a are no longer applicable. The CSTs (redundant or not) are not initiators for any accident previously evaluated. Now that the CSTs are redundant, the requirements of LCO 3.7.6a are no longer necessary to ensure the capability of the auxiliary feedwater system to perform its safety function. Therefore, the proposed deletion of LCO 3.7.6a will not affect the probability or consequences of any accident previously evaluated.

2. Do the proposed changes create the possibility of a new or different kind of accident from any accident previously evaluated?

No. The proposed change does not create any new failure modes for any system or component, nor does it adversely affect plant operation. The previously determined radiological consequences of a fuel handling accident inside containment with the personnel air lock doors open remain bounding for operation under the proposed changes. No new single failure scenarios are created, and the proposed changes do not introduce any new challenges to components and systems that could result in a new or different kind of accident from any previously evaluated.

Enclosure

Vogtle Electric Generating Plant Request to Revise Technical Specifications Containment Penetrations and Containment Ventilation Isolation Instrumentation

Significant Hazards Consideration Evaluation

The proposed deletion of LCO 3.7.6a is an administrative change only. The requirements of LCO 3.7.6a applied only during the time that the condensate storage tanks (CSTs) were not redundant. Due to the implementation of design changes which make the CSTs redundant for each unit, the requirements of LCO 3.7.6a are no longer applicable. Now that the CSTs are redundant, the requirements of LCO 3.7.6a are no longer necessary to ensure the capability of the auxiliary feedwater system to perform its safety function. No new single failure scenarios are created, and the proposed changes do not introduce any new challenges to components and systems that could result in a new or different kind of accident from any previously evaluated. Therefore, the proposed deletion of LCO 3.7.6a will not create a new or different kind of accident from any accident previously evaluated.

3. Do the proposed changes involve a significant reduction in a margin of safety?

No. The margin of safety for fission product release is 300 rem thyroid and 25 rem whole body as defined by 10 CFR 100. The previously determined radiological dose consequences for a fuel handling accident inside containment with the personnel air lock doors open remain bounding for operation under the proposed changes. These previously determined dose consequences were determined to be well within the limits of 10 CFR 100 by virtue of the fact that they meet SRP section 15.7.4 and GDC 19 acceptance criteria. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

The proposed deletion of LCO 3.7.6a is an administrative change only. The requirements of LCO 3.7.6a applied only during the time that the condensate storage tanks (CSTs) were not redundant. Due to the implementation of design changes which make the CSTs redundant for each unit, the requirements of LCO 3.7.6a are no longer applicable. Now that the CSTs are redundant, the requirements of LCO 3.7.6a are no longer necessary to ensure the capability of the auxiliary feedwater system to perform its safety function. Therefore, LCO 3.7.6a is not necessary to maintain margin of safety and the proposed change will not involve a reduction in a margin of safety.

Conclusion

Based on the preceding evaluations, the proposed changes do not involve a significant increase in the probability or consequences of any accident previously evaluated, do not create the possibility of a new or different kind of accident from any accident previously evaluated, and they do not involve a significant reduction in a margin of safety. Therefore, the proposed changes do not involve a significant hazards consideration as defined in 10 CFR 50.92.