

Georgia Power Company
313 Piedmont Avenue
Atlanta, Georgia 30308
Telephone 404 526-8526

Mailing Address
Post Office Box 4545
Atlanta, Georgia 30302

Executive Department



Georgia Power
the southern electric system

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May 13, 1988

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

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
MSIV CLOSURE TIME REQUIREMENTS

Gentlemen:

In accordance with the provisions of 10 CFR 50.90, as required by 10 CFR 50.59(c)(1), Georgia Power Company (GPC) hereby proposes changes to the Plant Hatch Units 1 and 2 Technical Specifications, Appendix A to Operating Licenses DPR-57 and NPF-5.

These proposed changes would revise the stroke time operability requirements for the Main Steam Line Isolation Valves (MSIVs). Specifically, the currently required 3 to 5 second closing time interval would be extended to 2 to 8 seconds. Associated with this change, the Unit 2 Technical Specifications (TS) would be modified to be consistent with the Boiling Water Reactor Standard Technical Specifications (NUREG-0123, Revision 3). To improve consistency between the Unit 1 and the Unit 2 TS, a specification specifically addressing MSIV requirements will be added to the Unit 1 TS. Also, for consistency, modifications will be made to the Definitions, Containment Systems, and Bases sections of the Unit 1 TS. GPC has determined that the implementation of these proposed changes will have an insignificant impact on existing plant safety analyses and, therefore, will not have an adverse impact on plant safety. These proposed changes, when approved, will provide increased flexibility during surveillance testing and will result in increased operability of the MSIVs without a reduction in safety.

Enclosure 1 provides detailed descriptions of these proposed changes and the circumstances necessitating the change request.

Enclosure 2 details the bases for our determination that the proposed changes do not involve significant hazards considerations.

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Page Two

Enclosure 3 provides page change instructions for incorporating the proposed changes. The proposed changed TS pages for Unit 1 and Unit 2 follow Enclosure 3.

To support the proposed changes, Enclosure 4 provides documentation that has not previously been submitted to the Nuclear Regulatory Commission (NRC). Please note that some of the information contained in Enclosure 4 has been marked "Proprietary" to protect the commercial interest of the vendor. In accordance with 10 CFR 2.790, an affidavit requesting that certain information be withheld from the public domain is included herein.

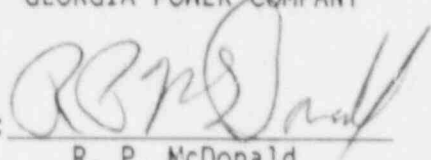
Payment of the filing fee in the amount of one hundred fifty dollars is enclosed.

To allow time for procedure revisions and orderly incorporation into copies of the TS, GPC requests that the proposed amendments, once approved by the NRC, be issued with an effective date to be no later than 60 days from the date of issuance of the amendments.

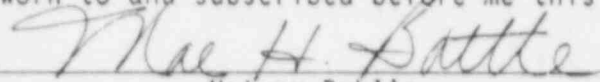
In accordance with the requirements of 10 CFR 50.91, a copy of this letter and all applicable enclosures will be sent to Mr. J. L. Ledbetter of the Environmental Protection Division of the Georgia Department of Natural Resources.

Mr. R. P. McDonald states he is Executive Vice President of Georgia Power Company and is authorized to execute this oath on behalf of Georgia Power Company, and that to the best of his knowledge and belief, the facts set forth in this letter are true.

GEORGIA POWER COMPANY

By: 
R. P. McDonald

Sworn to and subscribed before me this 13th day of May 1988.


Notary Public

Notary Public, Fulton County, Ga.
My Commission Expires Nov. 2, 1991

GDP/lc

Enclosures: (See next page.)

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Page Three

Enclosures:

1. Basis for Change Request.
2. 10 CFR 50.92 Evaluation.
3. Page Change Instructions.
4. "Safety Evaluation for Extension of MSIV Stroke Time Requirements for Plant Hatch Units 1 and 2," EAS-05-0188.
5. Filing Fee - \$150.00.

c: Georgia Power Company

Mr. J. T. Beckham, Jr., Vice President - Plant Hatch
Mr. L. T. Gucwa, Manager Nuclear Safety and Licensing
GO-NORMS

U. S. Nuclear Regulatory Commission, Washington, D. C.
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, Commissioner - Department of Natural Resources

ENCLOSURE 1

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
MSIV CLOSURE TIME REQUIREMENTS
BASIS FOR CHANGE REQUEST

PROPOSED CHANGE 1:

This change revises the Plant Hatch Units 1 and 2 Technical Specifications (TS) pertaining to the Main Steam Line Isolation Valve (MSIV) stroke time interval to reflect the evaluation results presented in "Safety Evaluation for Extension of MSIV Stroke Time Requirements for Plant Hatch Units 1 and 2," EAS-05-0188, January 1988 (Enclosure 4). Specifically, the current 3 to 5 second closing time interval requirement is being extended to 2 to 8 seconds. This new closure time interval is reflected in Specification 3/4.4.7 of the Unit 2 TS and in a new Specification, 3/4.6.M, of the Unit 1 TS.

Basis for Proposed Change 1:

The closure time interval required for the MSIVs is established to limit the release of reactor coolant or radioactive materials in the event of a design basis accident and to prevent violating pressurization or thermal limits during transient events. The Safety Evaluation documented in Enclosure 4 provides the results of evaluations regarding the impact of both a more rapid MSIV closure time and a slower closure time on safety analyses.

The shorter stroke time (2 seconds) primarily impacts transient analyses related to inadvertent MSIV closure. The transient analyses include overpressure protection and fuel thermal limits, and an analysis to verify the integrity of the main steam lines. The shorter stroke time also has an indirect impact on the Loss-of-Coolant Accident (LOCA) and containment response. The evaluations presented in Enclosure 4 demonstrate that reducing the minimum MSIV closure time from 3 to 2 seconds does not have a significant impact on the areas described above.

The longer MSIV stroke time (8 seconds) mainly affects reactor inventory loss and radiological release during accident events. Extending the closure time could potentially affect postulated transient events which result in reactor depressurization and the bases for establishing environmental qualification of electrical equipment. All these areas were evaluated in Enclosure 4, and it was determined that an 8 second maximum MSIV closure time has an insignificant impact on these evaluations.

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
MSIV CLOSURE TIME REQUIREMENTS
BASIS FOR CHANGE REQUESTBasis for Proposed Change 1: (Continued)

The Enclosure 4 evaluation demonstrates that extending the required MSIV closure interval to 2 to 8 seconds will not significantly impact plant safety.

PROPOSED CHANGE 2:

Proposed Change 2 clarifies sections of the Unit 2 TS to ensure consistency with the Boiling Water Reactor Standard Technical Specifications (BWRSTS), while additionally revising the Unit 1 TS to provide consistency with those of Unit 2. In part, this change deletes reference to the MSIVs from Primary Containment Isolation Valve (PCIV) Tables 3.6.3-1 of the Unit 2 TS and 3.7-1 of the Unit 1 TS, and adds a new specification, 3/4.6.M, to the Unit 1 TS. In addition, notes indicating the MSIVs are Group 1 isolation valves have been added to Tables 3.6.3-1 (Unit 2 TS) and 3.7-1 (Unit 1 TS). This note indicating the MSIVs are Group 1 isolation valves has also been added to Unit 1 Specification 3/4.6.M and Unit 2 Specification 3/4.4.7. Proposed Change 2 also modifies a footnote related to valve opening requirements in Unit 2 Table 3.6.3-1 and Unit 1 Table 3.7-1, while clarifying the Definitions, Primary Containment Integrity, and Primary Containment Isolation Valves sections of the Unit 1 TS (Sections 1.0.T, 3.7.A.2, and 3/4.7.D, respectively). In addition, Bases sections 1.2 and 3/4.6.M in the Unit 1 TS are modified to reflect the extended MSIV stroke time interval and the new Specification 3/4.6.M.

Basis for Proposed Change 2:

The Unit 2 TS have the same format as the Nuclear Regulatory Commission (NRC)-issued BWRSTS. The BWRSTS contain a separate Reactor Coolant System Specification (3/4.4.7) that specifically addresses the operability and surveillance requirements of the MSIVs. In addition to listing the required closing interval for the MSIVs, this specification allows 8 hours for an inoperable MSIV to be restored to operable status prior to isolating the affected steam line. Also included in the BWRSTS is a Containment Systems specification (3/4.6.3) which provides the requirements for the PCIVs listed in Table 3.6.3-1. Specification 3/4.6.3 allows only 4 hours to restore operation of an inoperable PCIV or to isolate the affected penetration before shutdown proceedings are initiated. The MSIVs are not specifically referenced in the BWRSTS Table

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
MSIV CLOSURE TIME REQUIREMENTS
BASIS FOR CHANGE REQUESTBasis for Proposed Change 2: (Continued)

3.6.3-1. Clearly, the requirements of 3/4.4.7 are intended for the MSIVs. The Unit 2 TS, in addition to containing Specification 3/4.4.7, also lists the MSIVs in PCIV Table 3.6.3-1, creating a discrepancy between the requirements of 3/4.4.7 and 3/4.6.3. To clarify the TS and to provide consistency with the NRC-issued BWRSTS, GPC proposes that reference to the MSIVs in Unit 2 TS Table 3.6.3-1 be deleted. Similarly, reference to the MSIVs will be deleted from Unit 1 TS Table 3.7-1 (and from the associated Surveillance Requirements of 4.7.D.1), and a new Specification, 3/4.6.M, reflecting the requirements of the Unit 2 MSIV Specification 3/4.4.7 will be added. Removing the MSIVs from Tables 3.6.3-1 and 3.7-1 deletes reference to the MSIVs as Group 1 PCIVs. For clarity, notes are added to Unit 2 Table 3.6.3-1 and Unit 1 Table 3.7-1, and Specifications 3/4.6.M and 3/4.4.7 of the Units 1 and 2 TS, respectively, to indicate the MSIVs are Group 1 isolation valves.

BWRSTS Table 3.6.3-1 contains a generic footnote that allows PCIVs to be opened (when normally required to be closed) under administrative control on an intermittent basis. The basis for this footnote is to allow PCIVs to be opened (with proper controls) during accident conditions to facilitate safety-related functions. Therefore, any PCIV that is not locked closed can be intermittently opened if sufficient administrative controls exist. This requirement is clarified in the Plant Hatch TS by revising the footnotes to Table 3.6.3-1 of the Unit 2 TS and Table 3.7-1 of the Unit 1 TS.

Additionally, for uniformity between the TS of both units, the Unit 1 definition of Primary Containment Integrity (Section 1.0.T), Primary Containment Integrity Specification 3.7.A.2, and Primary Containment Isolation Valves Specification 3/4.7.D are proposed to be revised to be consistent with the corresponding sections in the Unit 2 Specifications. This includes removing the surveillance requirement on lines with an inoperable PCIV (Unit 1 Specification 4.T.D.2), since it is not a requirement in the BWRSTS.

In addition to changes reflecting the extended MSIV stroke time interval, Bases section 1.2 has also been modified to delete discussion and reference to an outdated overpressure transient analysis that assumes a direct reactor scram on valve position. Since the worst overpressure transient (MSIV closure neglecting direct scram) is already discussed in this Bases section, a discussion of a less severe transient is not required.

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
MSIV CLOSURE TIME REQUIREMENTS
BASIS FOR CHANGE REQUESTBasis for Proposed Change 2: (Continued)

3.6.3-1. Clearly, the requirements of 3/4.4.7 are intended for the MSIVs. The Unit 2 TS, in addition to containing Specification 3/4.4.7, also lists the MSIVs in PCIV Table 3.6.3-1, creating a discrepancy between the requirements of 3/4.4.7 and 3/4.6.3. To clarify the TS and to provide consistency with the NRC-issued BWRSTS, GPC proposes that reference to the MSIVs in Unit 2 TS Table 3.6.3-1 be deleted. Similarly, reference to the MSIVs will be deleted from Unit 1 TS Table 3.7-1 (and from the associated Surveillance Requirements of 4.7.D.1), and a new Specification, 3/4.6.M, reflecting the requirements of the Unit 2 MSIV Specification 3/4.4.7 will be added. Removing the MSIVs from Tables 3.6.3-1 and 3.7-1 deletes reference to the MSIVs as Group 1 PCIVs. For clarity, notes are added to Unit 2 Table 3.6.3-1 and Unit 1 Table 3.7-1, and Specifications 3/4.6.M and 3/4.4.7 of the Units 1 and 2 TS, respectively, to indicate the MSIVs are Group 1 isolation valves.

BWRSTS Table 3.6.3-1 contains a generic footnote that allows PCIVs to be opened (when normally required to be closed) under administrative control on an intermittent basis. The basis for this footnote is to allow PCIVs to be opened (with proper controls) during accident conditions to facilitate safety-related functions. Therefore, any PCIV that is not locked closed can be intermittently opened if sufficient administrative controls exist. This requirement is clarified in the Plant Hatch TS by revising the footnotes to Table 3.6.3-1 of the Unit 2 TS and Table 3.7-1 of the Unit 1 TS.

Additionally, for uniformity between the TS of both units, the Unit 1 definition of Primary Containment Integrity (Section 1.0.T), Primary Containment Integrity Specification 3.7.A.2, and Primary Containment Isolation Valves Specification 3/4.7.D are proposed to be revised to be consistent with the corresponding sections in the Unit 2 Specifications. This includes removing the surveillance requirement on lines with an inoperable PCIV (Unit 1 Specification 4.T.D.2), since it is not a requirement in the BWRSTS.

In addition to changes reflecting the extended MSIV stroke time interval, Bases section 1.2 has also been modified to delete discussion and reference to an outdated overpressure transient analysis that assumes a direct reactor scram on valve position. Since the worst overpressure transient (MSIV closure neglecting direct scram) is already discussed in this Bases section, a discussion of a less severe transient is not required.

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
MSIV CLOSURE TIME REQUIREMENTS
BASIS FOR CHANGE REQUEST

Basis for Proposed Change 2: (Continued)

All TS modifications discussed under Proposed Change 2 are basically administrative changes to clarify the TS and improve consistency between the units. These revisions are also consistent with the requirements of the NRC-issued BWRSTS and, therefore, will not adversely affect plant equipment or system operation.

ENCLOSURE 2

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
MSIV CLOSURE TIME REQUIREMENTS
10 CFR 50.92 EVALUATION

PROPOSED CHANGE 1:

This change revises the Plant Hatch Units 1 and 2 TS pertaining to the MSIV stroke time interval to reflect the evaluation results presented in "Safety Evaluation for Extension of MSIV Stroke Time Requirements for Plant Hatch Units 1 and 2," EAS-05-0188, January 1988 (Enclosure 4). Specifically, the current 3 to 5 second closing time interval requirement is being extended to 2 to 8 seconds. This new closure time interval is reflected in Specification 3/4.4.7 of the Unit 2 TS and in a new Specification, 3/4.6.M, of the Unit 1 TS.

Basis for No Significant Hazards Consideration Determination:

The proposed change does not involve a significant hazards consideration for the following reasons:

1. It does not involve a significant increase in the probability or consequences of an accident previously evaluated, because the evaluation presented in Enclosure 4 concludes that the results of evaluations dependent on the MSIV closure interval will not be significantly impacted by the extension of the interval to 2 to 8 seconds.
2. It does not create the possibility of a new or different kind of accident from any previously evaluated, because no change in plant design or operation will occur as a result of this change.
3. The proposed change does not involve a significant reduction in the margin of safety, because the evaluation presented in Enclosure 4 demonstrates that extending the MSIV closure interval does not have a significant impact on plant safety analyses.

ENCLOSURE 2 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
MSIV CLOSURE TIME REQUIREMENTS
10 CFR 50.92 EVALUATION

PROPOSED CHANGE 2:

As discussed in Enclosure 1, Proposed Change 2 clarifies sections of the Plant Hatch TS related to MSIVs, Primary Containment Integrity, and PCIIVs to improve consistency between the Unit 1 and Unit 2 TS and to reflect the requirements of the BWRSTS.

Basis for No Significant Hazards Consideration Determination:

The proposed change does not involve a significant hazards consideration for the following reasons:

1. It does not involve a significant increase in the probability or consequences of an accident previously evaluated, because no change in plant operation will occur as a result of this change. This change provides consistency and reflects the requirements of the NRC-issued BWRSTS.
2. It does not create the possibility of a new or different kind of accident from any previously analyzed, because the change is basically administrative in nature, clarifies the TS, and does not introduce any new modes of plant equipment operation or failure.
3. It does not involve a significant reduction in the margin of safety, because plant operation is not affected and analyzed margins of safety are unchanged.

ENCLOSURE 3

PLANT HATCH - UNITS 1, 2
 NRC DOCKETS 50-321, 50-366
 OPERATING LICENSES DPR-57, NPF-5
 REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
 MSIV CLOSURE TIME REQUIREMENTS
PAGE CHANGE INSTRUCTIONS

The proposed changes to the Unit 1 and Unit 2 Technical Specifications (Appendix A to Operating Licenses DPR-57 and NPF-5) would be incorporated as follows:

UNIT 1

<u>Remove Page</u>		<u>Insert Page</u>
1.0-4		1.0-4
1.2-3		1.2-3
1.2-5		1.2-5
-		3.6-10e
-		3.6-10f
3.6-32		3.6-32
3.7-2		3.7-2
3.7-3		3.7-3
3.7-14		3.7-14
3.7-16		3.7-16
3.7-16a		3.7-16a
3.7-17		3.7-17
3.7-18		3.7-18
3.7-18a		3.7-18a
3.7-18b		3.7-18b
3.7-19		3.7-19
3.7-19a		3.7-19a

UNIT 2

<u>Remove Page</u>		<u>Insert Page</u>
3/4 4-19		3/4 4-19
3/4 6-17		3/4 6-17
3/4 6-18		3/4 6-18
3/4 6-19		3/4 6-19
3/4 6-20		3/4 6-20
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3/4 6-22		3/4 6-22
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3/4 6-25		3/4 6-25
3/4 6-26		3/4 6-26
3/4 6-27		3/4 6-27
3/4 6-28		3/4 6-28
3/4 6-29		3/4 6-29
3/4 6-30		3/4 6-30
3/4 6-31		3/4 6-31
3/4 6-32		3/4 6-32