

Georgia Power Company
333 Peachtree Avenue
Atlanta, Georgia 30308
Telephone 404 526-6529

Mailing Address
Post Office Box 4545
Atlanta, Georgia 30302

Executive Department



Georgia Power

THE SOUTHERN ELECTRIC SYSTEM

SL-4530
0251I
X7GJ17-H600

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:
SUPPRESSION POOL TEMPERATURE LIMIT

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.

Technical Specifications for both Plant Hatch units provide a Limiting Condition for Operation (LCO) requiring plant shutdown in the event the suppression pool temperature exceeds 95°F for greater than 24 hours. Due to high temperatures in the state of Georgia, the temperature of the Altamaha River, which serves as the ultimate heat sink for the plant service water and residual heat removal systems, often rises to the point where sufficient differential temperature is not available to effectively maintain the suppression pool temperature below 95°F. Last year, Plant Hatch Unit 2 entered the LCO for several hours, and GPC submitted an emergency Technical Specifications change for relief. However, since the suppression pool temperature was restored to within limits, the relief was not required. (Reference GPC letter to the NRC dated August 14, 1987.)

Since the problem is recurrent, GPC proposes permanent Technical Specifications changes to revise the portions related to the 95°F limit. Once the change is approved, the need for emergency change will be reduced, and increased operational flexibility will be provided without a reduction in safety. A minor editorial change in the Unit 2 Specifications deleting reference to the torus (suppression pool) water volume is also proposed.

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

8805170242 880513
PDR ADOCK 05000321
P DCD

AP01
w/check \$150
#035439

U.S. Nuclear Regulatory Commission
May 13, 1988
Page Two

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

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

Enclosure 4 provides a safety evaluation prepared by General Electric Company justifying the deletion of the operating limit on the suppression pool temperature of 95°F. Please note that Enclosure 4 contains proprietary information of General Electric Company and is marked "Proprietary" to protect the commercial interest of the vendor. In accordance with 10 CFR 2.790, an affidavit requesting certain information be withheld from the public domain is included herein.

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

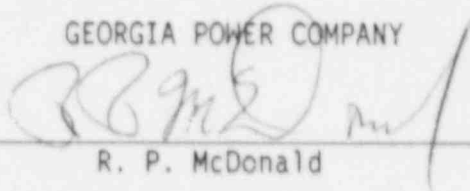
To allow time for procedure revisions and orderly incorporation into copies of the Technical Specifications, GPC requests the proposed amendment, once approved by the NRC, be issued with an effective date to be no later than 60 days from the date of issuance of the amendment.

In accordance to 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.

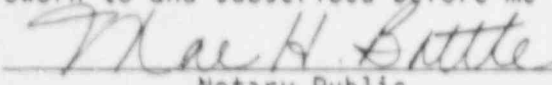
Mr. R. P. McDonald states he is Executive Vice President of Georgia Power Company and is authorized to execute this oath on behalf of Georgia Power Company, and to the best of his knowledge and belief, the facts set forth in this letter are true.

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, Ge.
My Commission Expires Nov. 2, 1991

GKM/tb/lc

Enclosures: (See next page.)

02511

U.S. Nuclear Regulatory Commission
May 13, 1988
Page Three

Enclosures:

1. Basis for Change Request.
2. 10 CFR 50.92 Evaluation.
3. Page Change Instructions.
4. "Elimination of the High Suppression Pool Temperature Limit for Plant Hatch Units 1 and 2," EAS-19-0388.
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:
SUPPRESSION POOL TEMPERATURE LIMIT
BASIS FOR CHANGE REQUEST

PROPOSED CHANGES:

The proposed amendments to the Unit 1 and the Unit 2 Technical Specifications will remove the Limiting Condition for Operation (LCO) based on 95°F suppression pool temperature but will still require pool cooling to be initiated at $\geq 100^\circ\text{F}$. The suppression pool temperature limit (SPTL) requiring plant shutdown (110°F) and vessel depressurization (120°F) will remain unchanged. The generic analyses performed for the Boiling Water Reactor Owners Group (BWROG) SPTL Committee and a Plant Hatch-specific evaluation performed by General Electric Company (Enclosure 4) show the design basis requirements are satisfied as long as the operating limits are less than the 110°F SPTL requiring immediate shutdown.

It is also proposed to delete reference to the torus (suppression pool) water volume in the Unit 2 Technical Specifications. This is an editorial change, since the Technical Specifications of both units will still require monitoring of the suppression pool water level.

Basis for Proposed Changes:

Historically, the suppression pool temperature limit for normal operation has been chosen based on the maximum expected service water temperature. For Plant Hatch, this temperature is 95°F . Many licensing analyses use this pool temperature as the initial condition. Generic evaluations performed for the BWROG SPTL Committee show the normal operating suppression pool temperature limit for BWRs with Mark I Containments can be raised to 110°F with no adverse impact on safety. The following discussion addresses the impact of raising pool temperature on existing Plant Hatch safety analyses. These evaluations also include assessment of Anticipated Transient Without Scram (ATWS) events and Emergency Procedure Guidelines (EPGs), even though these areas are beyond the historical design basis of the plant.

General Electric (GE) Report EAS-19-0388 (Enclosure 4) details the results of the Plant Hatch evaluations and provides the technical bases for the proposed Technical Specifications changes. The evaluations show that the proposed changes are acceptable and consider the effect of these changes on safety relief valve (SRV) loads, containment response, and emergency core cooling system (ECCS) performance.

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
SUPPRESSION POOL TEMPERATURE LIMIT
BASIS FOR CHANGE REQUEST

Basis for Proposed Changes: (Continued)

The proposed change to the Unit 2 Technical Specifications deleting reference to suppression pool water volume is editorial, since water level monitoring will still be required. Obviously, the actual volume of water was never monitored, and required water levels correspond to a fixed water volume unless substantial modifications to the submerged portion of the torus are performed. When these modifications are performed (e.g. the Mark I Containment Long Term Program), the impact of the changes on relevant safety evaluations are assessed.

ENCLOSURE 2

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
SUPPRESSION POOL TEMPERATURE LIMIT
10 CFR 50.92 EVALUATION

PROPOSED CHANGES:

The proposed change will modify Unit 1 Technical Specification 3.7.A.1.c to eliminate the operational suppression pool water temperature limit during periods of high river temperature. Similarly, the Unit 2 Limiting Condition for Operation Specification 3.6.2.1.b and the resulting Action Statement will be modified to eliminate the 95°F suppression pool operating temperature limit but will still require initiation of pool cooling at $\geq 100^\circ\text{F}$. Also, a minor editorial change in the Unit 2 Technical Specifications deleting reference to the torus (suppression pool) water volume is proposed.

Basis for Proposed Changes:

Reference Enclosures 3 and 4 for a detailed description of the safety basis for the proposed changes. Based on these enclosures, the following conclusions can be drawn:

These changes do not involve a significant increase in the probability or consequences of an accident, because applicable accident analyses that could be impacted by raising the suppression pool operating limit have been examined and found to be acceptable. The scram and depressurization limits are unchanged.

The possibility of a different kind of accident from any analyzed previously is not created by these changes, since the proposed changes would only revise an operating limit on permissible pool temperature. This change does not involve the potential for a new accident type, since plant design and function are unchanged.

Margins of safety are not significantly reduced by these changes, because the impact of the proposed pool temperature has been evaluated relative to safety analyses (Enclosure 4), and margins have been shown to be insignificantly impacted. Sufficient heat capacity remains in the suppression pool for complete condensation of decay and sensible heat following an accident or reactor shutdown.

ENCLOSURE 2 (Continued)

PLANT HATCH - UNITS 1,
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
SUPPRESSION POOL TEMPERATURE LIMIT
10 CFR 50.92 EVALUATION

Basis for Proposed Changes: (Continued)

The deletion of the reference to the suppression pool water volume is an editorial change and consistent with the "Examples of Amendments that are Considered Not Likely to Involve Significant Hazards Considerations," listed on page 14,870 of the April 16, 1983, issue of the Federal Register.

ENCLOSURE 3

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
SUPPRESSION POOL TEMPERATURE LIMIT
PAGE CHANGE INSTRUCTIONS

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

	<u>Remove Page</u>	<u>Insert Page</u>
UNIT 1:	3.7-1 3.7-1a 3.7-30	3.7-1 3.7-1a 3.7-30
UNIT 2:	3/4 5-9 3/4 6-11 3/4 6-12 3/4 6-13 B 3/4 6-3	3/4-5-9 3/4 6-11 3/4 6-12 3/4 6-13 B 3/4 6-3