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Vogtle Project

September 2, 1988

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

Log: GN-1483
File: X7N16

NRC DOCKET NUMBER 50-424
CONSTRUCTION PERMIT NUMBER CPPR-109
VOGTLE ELECTRIC GENERATING PLANT - UNIT 2
PROOF AND REVIEW TECHNICAL SPECIFICATIONS

Gentlemen:

We have reviewed the Proof and Review copy of the combined Technical Specifications for Vogtle Units 1 and 2. Enclosed are our comments for your consideration in developing the final draft. The comments consist mainly of editorial comments, the incorporation of Unit 1 Technical Specification amendments and change requests that are anticipated to be approved in the near future, and the addition of Unit 2 specific information relative to heatup and cooldown rates.

The enclosures include a brief description and justification of each proposed change to the Proof and Review copy. Since some changes involve more than one page we are also including a table that lists each page on which we proposed a change and the justification applicable to that page. The enclosures include a list of open items that we have yet to provide to the NRC.

The enclosures are: (1) a list of changed pages and the justifications for the changes, (2) a list of items to be provided later, and (3) marked-up Proof and Review Technical Specification pages with figures.

Sincerely,

J. A. Bailey

J. A. Bailey
Project Licensing Manager

JAB/sa
Enclosures
xc: list attached

*Acc 1/5
Revised
Dist*

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PDR ADOCK 05000424
PDC

U. S. Nuclear Regulatory Commission
September 2, 1988
Page 2

xc: NRC Regional Administrator
NRC Resident Inspector
P. D. Rice
J. P. Kane
R. A. Thomas
B. W. Churchill, Esquire
J. B. Hopkins (2)
G. Bockhold, Jr.
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ENCLOSURE 1 TO LETTER GN-1483

List of pages with proposed changes and justifications.

<u>Change Pages</u>	<u>Justification to #</u>		
IV	3	3/4 3-10	1
VI	1	3/4 3-11	1
VIII	5	3/4 3-13	3
XI	1	3/4 3-14	?
XVI	5	3/4 3-15	1
XXII	2	3/4 3-20	1
2-2	20	3/4 3-21	1, 4
2-3	1	3/4 3-25	13
2-5	1	3/4 3-30	1
3/4 0-4	1	3/4 3-31	1
3/4 0-2	1, 11	3/4 3-35	1
3/4 1-3a	3	3/4 3-40	1
3/4 1-3b	3	3/4 3-44	13
3/4 1-3c	3	3/4 3-50	19
3/4 1-3d	3	3/4 3-51	1
3/4 1-4	3	3/4 3-52	1
3/4 1-6	1	3/4 3-54	1
3/4 1-7	1	3/4 3-56	1
3/4 1-11	3	3/4 3-57	1
3/4 1-12	3	3/4 3-59	1
3/4 1-16	1	3/4 3-60	1
3/4 1-18	1	3/4 3-61	1
3/4 1-20	1	3/4 3-62	1
3/4 1-21	1	3/4 3-66	1, 19
3/4 1-22	20	3/4 3-69	1
3/4 2-1	1	3/4 3-72	1, 19
3/4 2-3	20	3/4 3-74	1
3/4 2-5	20	3/4 3-76	1
3/4 3-3	1	3/4 3-80	1
3/4 3-6	1	3/4 4-3	1

3/4 4-5	1	3/4 7-21	1
3/4 4-6	1	3/4 7-24	20
3/4 4-10	1	3/4 7-28	1
3/4 4-16	1	3/4 7-31	1
3/4 4-21	15	3/4 7-32	1
3/4 4-22	1	3/4 8-1	1
3/4 4-26	20	3/4 8-2	1
3/4 4-30	5, 1	3/4 8-5	1, 18
3/4 4-31	5, 16	3/4 8-6	1
3/4 4-31a	5, 16	3/4 8-7	1
3/4 4-32	5, 16	3/4 8-9	1
3/4 4-32a	5, 16	3/4 8-14	19
3/4 4-34	5, 1	3/4 8-21	8
3/4 4-35	5	3/4 8-22	1
3/4 4-35a	5	3/4 8-23	1
3/4 5-1	3, 1	3/4 8-24	1
3/4 5-4	12	3/4 9-14	13
3/4 5-10	3	3/4 11-1	1
3/4 6-3	1	3/4 11-2	1
3/4 6-7	1	3/4 11-3	1
3/4 6-8	17	3/4 11-8	1
3/4 6-11	1	3/4 11-9	1
3/4 6-12	1	3/4 11-10	1
3/4 7-1	1	3/4 12-3	1
3/4 7-3	1	3/4 12-4	1
3/4 7-8	1	3/4 12-5	1
3/4 7-14	6	3/4 12-6	1
3/4 7-16	6	3/4 12-9	1
3/4 7-17	7	3/4 12-10	1
3/4 7-19	1	83/4 0-4	1

ENCLOSURE 1

Page 3

B3/4 0-5	1	5-6	1
B3/4 0-1	1	6-1	2, 1
B3/4 1-3	3, 1	6-2	2
B3/4 2-2	1	6-3	2
B3/4 2-3	20	6-4	2
B3/4 3-3	3	6-5	1
B3/4 3-4	1, 14	6-6	2, 10
B3/4 4-7	5, 1	6-7	2
B3/4 4-8	5, 1	6-8	1, 2
B3/4 4-9	5	6-9	2
B3/4 4-9a	5	6-12	2, 1
B3/4 4-10	5	6-13	2
B3/4 4-11	5	6-14	2
B3/4 4-12	5	6-20	1
B3/4 4-15	5, 1	6-24	2
B3/4 5-1	3	6-25	2
B3/4 5-2	3, 1, 12		
Title Page for Bases 3/4.6	1		
B3/4 6-2	1		
B3/4 6-3	3		
B3/4 7-1	1		
B3/4 7-7	1		
B3/4 8-1	1		
B3/4 8-2	1		
B3/4 8-3	1		
B3/4 9-1	3		
5-2	20		
5-3	20		
5-5	9		

JUSTIFICATIONS FOR CHANGES TO
PROOF AND REVIEW DRAFT

1. Description of the Change

Page

- VI Change "Loose-Parts" to "Loose Parts".
- XI "Change "MOTOR OPERATED" to "MOTOR-OPERATED".
- 2-3 Align the margin for Equation 2.2-1 over the word "where".
- 2-5 Change " \cong " to " \geq ".
- 3/4 0-4 Remove the page number and plant identification from the title page for Section 3.0 and 4.0 and move the title page to the front of Section 3.0 and 4.0.
- 3/4 0-2 The period after "common." in 3.0.5 should be outside the quotation mark.
- 3/4 1-6 To eliminate confusion for items that have two footnotes one indicated by * and the other by **, replace the ** with #. (The "*" and "**" look like "****" in some cases.)
- 3/4 1-7 Insert "and" after "72°F" in Specification 4.1.2.1.a. This is consistent with 4.1.2.2.a.
- 3/4 1-16 Adjust the left margin of line six such that the word "Pressure" begins beneath the word "Break"
- 3/4 1-18 Replace ** with #. See justification for change to page 3/4 1-6.
- 3/4 1-20 Replace ** with #. See justification for change to page 3/4 1-6.
- 3/4 1-21 Replace ** with #. See justification for change to page 3/4 1-6.
- 3/4 2-1 Replace ** with #. See justification for change to page 3/4 1-6.
- 3/4 3-3 Align table entries for Table 3.3-1.

1. Description of the Change (Continued)Page

- 3/4 3-6 "Under voltage/under frequency" should be "undervoltage/underfrequency".
- 3/4 3-10 Remove the extra space from the column headings and correct the alignment for the table entries for functional Unit 12.
- 3/4 3-11 Change the dotted line to a solid line to separate the footnote from the remainder of the page.
- 3/4 3-14 Eliminate the space between table notations (16) and (17).
- 3/4 3-15 Move the word "where" to align it under the word Equation and reduce the space between "Equation 2.2-1" and the first term of the Equation.
- 3/4 3-20 The hand-marked *'s on functional units 4.c and 4.e should be typed, align "loop 2" in functional unit 4.c.
- 3/4 3-21 The hand-marked "*" on functional unit 5.c should be typed.
- 3/4 3-30 This page was inadvertently omitted from the Proof and Review copy. A copy of this page is included for convenience.
- 3/4 3-31 Change the location of the $\$$ to appear after 18.5% for items 6.b.1 and 2.
- 3/4 3-35 Align margin for the table notations.
- 3/4 3-40 Change the location of the ** to appear after "High-High" for item 5.c.
- 3/4 3-51 Align "(basemat)" beneath the word "Unit" in item 5.a.
- 3/4 3-52 Align "(basemat)" beneath the word "Unit" in item 5.a.
- 3/4 3-54 Delete the spurious mark E.
- 3/4 3-56 Delete the "LP" from item 3 of Table 3.3-7.
- 3/4 3-57 Realign entries in the table.
- 3/4 3-59 Realign instrument numbers.
- 3/4 3-60 Realign entrant in the table.

1. Description of the Change (Continued)

Page

- 3/4 3-61 Delete the "s" from "requirements" and capitalize letters as indicated.
- 3/4 3-62 Delete the "s" from "requirements" and capitalize letters as indicated.
- 3/4 3-66 Realign entries on Table 3.3-9.
- 3/4 3-69 Realign entrant in the table.
- 3/4 3-72 Realign entries on Table 3.3-10.
- 3/4 3-74 Insert "the" between "if" and "inlet" in ACTION statement 4.9.b. Add a period at the end of table notation #.
- 3/4 3-76 Realign entries to Table 4.3-6.
- 3/4 3-80 Realign entries to Table 3.3-11.
- 3/4 4-3 Change "50 °F" to "50°F".
- 3/4 4-5 Change "50 °F" to "50°F".
- 3/4 4-6 Correct indentation of Specification 4.4.1.4.2.2.
- 3/4 4-10 Align margin in Specification 4.4.4.1.
- 3/4 4-16 Capitalize "specification".
- 3/4 4-22 Align "VOGTLE UNITS - 1 & 2" with the left margin.
- 3/4 4-30 Delete the spurious statement "FIGURE 3.4-2".
- 3/4 4-34 Insert "Specification" before 3.4.9.3.c in two places and change "GPM" to "gpm".
- 3/4 5-1 Move "gallons" to before the parenthetical statement and relocate periods in 3.5.1.b and 4.5.1.1.a.2).
- 3/4 6-3 Add "and" after item d.1) and change the comma to a period after item d.2).
- 3/4 6-7 Move the word "location" such that it is directly above items a, b and c.

1. Description of the Change (Continued)

Page

- 3/4 6-11 Insert "Specification" before 3.6.1.7b in ACTION statement b. There is no apparent need to hyphenate the word "isolation" in 3.6.1.7a.
- 3/4 6-12 "La" and "Pa" should be "L_a" and "P_a" in Specification 4.6.1.7.2.
- 3/4 7-1 Move "Specification" to the next line to avoid confusion of 4.0.5 with 4.7.1.1.
- 3/4 7-3 Center "Valve Number" over the appropriate section of Table 3.7-2 and add a period after the abbreviation of inches.
- 3/4 7-8 Center the title above the left-hand column in Table 4.7-1.
- 3/4 7-19 Replace "**" by "§" to avoid confusion due to two footnotes on the same item in Specification 4.7.8.b.
- 3/4 7-21 Relocate the "+" in the equation in Specification 4.7.8.e.3).
- 3/4 7-28 Change "BOOB" to "B008" and adjust the spacing of the column in Table 3.7-3.
- 3/4 7-31 Capitalize "specification" in ACTION b.
- 3/4 7-32 Change "3/4.7.13 (Continued)" to "PLANT SYSTEMS (Continued)".
- 3/4 8-1 Move "of fuel" from after the parenthetical statement to before the parenthetical statement.
- 3/4 8-2 § should be a superscript.
- 3/4 8-5 § should be a superscript in item f, the word Specification should be inserted before 4.8.1.1.2 in footnote *, and .007% should be written as 0.007% in footnote #.
- 3/4 8-6 Correct the spelling of syachronized.
- 3/4 8-7 § and ## should be superscripts in item 7).
- 3/4 8-9 Delete the underline from the word "and" in the footnotes.
- 3/4 8-22 Add "-" between Motor and Operated in the title of Table 3.8-1 and indent the phrase "ACCWS outlet Header" in the table.
- 3/4 8-23 Add "(continued)" after Table 3.8-1. Add "-" to Motor-Operated.

1. Description of the Change (Continued)Page

- 3/4 8-24 Add "(continued)" after Table 3.8-1. Add "-" to Motor-Operated.
- 3/4 11-1 Adjust the margin of the ACTION statements.
- 3/4 11-2 Capitalize "Waste Water Retention Basin" in Table 4.11-1.
- 3/4 11-3 Indent the second line of the definitions of equation terms in Table 4.11-1, table notations.
- 3/4 11-8 Add an "s" to Specification in ACTION b.
- 3/4 11-9 Add VOGTLE UNITS - 1 & 2 and the page number to the bottom of the page.
- 3/4 11-10 Correct spelling of "omitted" and indent the second lines of the definitions of equation terms in Table 4.11-2.
- 3/4 12-3 Add VOGTLE UNITS - 1 & 2 and the page number to the bottom of the page.
- 3/4 12-4 Add VOGTLE UNITS - 1 & 2 and the page number to the bottom of the page and adjust the entries of Table 3.12-1 to align under the headings of the columns as marked.
- 3/4 12-5 Add VOGTLE UNITS - 1 & 2 and the page number to the bottom of the page and adjust entry of item 3.c as marked.
- 3/4 12-6 Add VOGTLE UNITS - 1 & 2 and the page number to the bottom of the page and adjust entry 4.c as marked.
- 3/4 12-9 Add VOGTLE UNITS - 1 & 2 and the page number to the bottom of the page.
- 3/4 12-10 Add VOGTLE UNITS - 1 & 2 and the page number to the bottom of the page.
- 83/4 0-4 Delete page number as this is the title page for the Basos for 3.0 and 4.0 and delete the unit designator at the bottom of the page.
- 83/4 0-5 Delete the page number and delete the unit designator at the bottom of the page.

i. Description of the Change (Continued)

Page

- B3/4 0-1 Adjust the margin for this page.
- B3/4 1-3 Change $F_{\Delta H}$ to $F_{\Delta H}^N$ under 3/4.1.3 item 2.
- B3/4 2-2 Change $F_{\Delta H}^N$ to $F_{\Delta H}^N$ in the title line for 3/4.2.2 and 3/4.2.3.
- B3/4 3-4 Insert the word "and" between "instrumentation" and "corresponding" in Bases B3/4.3.3.3.
- B3/4 4-7 Adjust the subscript of " $1_{\Delta H}$ " such that it doesn't overlap the line below it.
- B3/4 4-8 Capitalize Effective Fuel Power Years.
- B3/4 4-15 Change "10CFR50" to "10 CFR 50".
- B3/4 5-2 " FT^2 should be changed to " ft^2 ".
- Title page for Bases 3/4.6 - Delete unnumbered page entitled "Bases for Section 3/4.6".
- B3/4 6-2 Change "each" to "the" and change "c1.3" to "c.1.3" in Bases section B3/4 6.1.6.
- B3/4 7-1 Adjust the margin of the definition of "SP" and "V" and add a period at the end of the definition of Y.
- B3/4 7-7 Adjust margin of the title for Bases Section 3/4.7.13.
- B3/4 8-1 Change "VOGTLE-UNIT 1" to "VOGTLE UNITS - 1 & 2" at the bottom of the page.
- B3/4 8-2 Change "VOGTLE-UNIT 1" to "VOGTLE UNITS - 1 & 2" at the bottom of the page.
- B3/4 8-3 Change "VOGTLE-UNIT 1" to "VOGTLE UNITS - 1 & 2" at the bottom of the page.
- 5-6 Add VOGTLE UNITS - 1 & 2 and the page number to the bottom of the page.
- 6-1 Capitalize "Senior Operator" and place the "#" symbol as a superscript.
- 6-5 Change "not" to "no" in footnote **.

1. Description of the Change (Continued)

Page

- 6-8 Add "Final" between "Vogtle" and "Safety Analysis Report" in item e.
- 6-12 Add a period at the end of 6.4.2.8, item i.
- 6-20 Change 3.3.3.10 and 3.3.3.11 to 3.3.3.9 and 3.3.3.10, respectively, in Specification 6.8.1.4.

Justification for the Changes

These changes represent editorial, format, spelling or syntax changes that do not alter any requirements.

Pages Affected

See the Description of the Changes for affected page numbers.

2. Description of the Change

This change incorporates Amendment 6 to the Unit 1 Technical Specifications into the Proof and Review copy of the Combined Unit 1 and 2 Technical Specifications. This amendment replaces organizational charts with more general organizational requirements.

Justification for the Change

This change has been approved for Unit 1 and is also applicable to Unit 2. The change is consistent with NRC Generic Letter 88-06, "Removal of Organizational Charts from Technical Specification Administrative Control Requirements," issued on March 22, 1988. Additional information concerning the justification of the change is found in Georgia Power letter SL-4752 of June 1, 1988 to the NRC, that requested the change, and in the NRC letter of July 11, 1988, that issued the change.

Pages Affected

XXII	6-8
6-1	6-9
6-2	6-12
6-3	6-13
6-4	6-14
6-6	6-24
6-7	6-25

3. Description of the Change

The Proof and Review copy of the combined Technical Specifications is revised to show changes to the Unit 1 Specifications that are applicable to the second operating cycle of Unit 1 but are not applicable to the initial operating cycle of Unit 2. These changes incorporate different Moderator Temperature Coefficient requirements, RWST Boron Concentration requirements, SHUTDOWN MARGIN requirements and high flux at shutdown alarm requirements.

Justification for the Change

The Unit 2 requirements have not changed, they remain the same as those approved for the initial operating cycle of Unit 1, which are described in the FSAR, addressed in the NRC's Safety Evaluation Report, and currently reflected in the Unit 1 Technical Specifications. This change to the Proof and Review Copy of the combined Technical Specifications incorporates changes only for Unit 1, second operating cycle. These changes were requested by Georgia Power Company letter SL-4682 of May 19, 1988, and are currently under review by the NRC. These changes are proposed to the Proof and Review copy of the combined Technical Specifications in anticipation of their approval for Unit 1.

Pages Affected

IV	3/4 5-1
3/4 1-3a	3/4 5-10
3/4 1-3b	B3/4 1-3
3/4 1-3c	B3/4 3-3
3/4 1-3d	B3/4 5-1
3/4 1-4	B3/4 5-2
3/4 1-11	B3/4 6-3
3/4 1-12	B3/4 9-1
3/4 3-13	

4. Description of the Change

Add a footnote to page 3/4 3-21 that states:

"* See Specification 3.3.3.6"

Justification for the Change

The "*" is already placed on the table on page 3/4 3-21 but the footnote to which it refers was omitted. This footnote does not include or alter any requirements of the Technical Specifications. It alerts the reader to the fact that the instrument to which it refers appears elsewhere within the Technical Specifications. This cross reference is made in a similar manner for other pages of this same table.

Page Affected

3/4 3-21

5. Description of the Change

Add specific references to Specification 3.4.9.1 to address separate heatup and cooldown curves for each unit. Revise Figures 3.4-2 and 3.4-3 to apply to Unit 1 only and add new figures for Unit 2. Add a new Figure 3.4-4b to address separate PORV setpoints for Unit 2 and revise Specification 3.4.9.3 accordingly. Revise the Bases for 3/4.4.9 to explain the reasons for separate Unit 1 and 2 heatup and cooldown curves.

Justification for the Change

None of the Unit 1 requirements have changed. The heatup and cooldown curves for Unit 2 have been developed using the same criteria and methodology as was used for Unit 1. The Unit 1 curves are not applicable to Unit 2 because the Unit 2 material has an initial RT_{NDT} which is greater than that for Unit 1.

Pages Affected

VIII	3/4 4-35a
XVI	B3/4 4-7
3/4 4-30	B3/4 4-8
3/4 4-31	B3/4 4-9
3/4 4-31a	B3/4 4-9a
3/4 4-32	B3/4 4-10
3/4 4-32a	B3/4 4-11
3/4 4-34	B3/4 4-12
3/4 4-35	B3/4 4-15

b. Description of the Change

Change 80°F to 85°F in Specification 4.7.6.a, and 850 CFM to 1500 CFM in 4.7.6.e.3.

Justification for the Change

These changes were requested for Unit 1 by Georgia Power letter SL-4685 of May 19, 1988 and issued as Amendment 9 to the Unit 1 Technical Specifications by NRC letter of August 17, 1988. It raises the allowable control room temperature by 5°F and increases the required pressurization flow rate in conjunction with the removal of portions of the partition between the Unit 1 and Unit 2 areas of the control room. Since these portions of the partition will be removed prior to Unit 2 licensing, the change had to be made initially for the Unit 1 Technical Specifications. The Unit 1 Technical Specification change also included additional requirements (in the form of footnotes) that apply only to Unit 1 and only during the period of time from the removal of the control room partition until licensing of Unit 2. Those footnotes do not need to be included in the combined Technical Specifications, because they will no longer be applicable after Unit 2 is licensed.

Pages Affected

3/4 7-14

3/4 7-15

7. Description of the Change

Provide a space for insertion of Unit 2 Piping Penetration Area
Filtration and Exhaust System flowrate in Specification 4.7.7.b.1.

Justification for the Change

This value is to be provided for Unit 2 following completion of system
preoperational testing.

Page Affected

3/4 7-17

8. Description of the Change

Delete "during shutdown" from Specification 4.8.4.2.c.

Justification for the Change

Some of the overload protection bypass devices can be tested at times other than during shutdown. This change was requested for Unit 1 by Georgia Power Company letter SL-4737 of June 7, 1988 and issued as Amendment 10 to the Unit 1 Technical Specifications by NRC letter of August 24, 1988 and is also applicable to Unit 2.

Page Affected

3/4 8-21

9. Description of the Change

Insert "Unit 1" after the first word of Specification 5.6.1.1. Delete Specification 5.6.1.2 and renumber 5.6.1.3 and 5.6.1.4 accordingly. Replace "west" with "Unit 2" in Specification 5.6.1.2 and change 2.4% to 1.13% in 5.6.1.2.a. Delete "west" from Specification 5.6.1.3.

Justification for the Change

The current project nomenclature for the spent fuel pools is to refer to them as the Unit 1 or Unit 2 spent fuel pool instead of the east or west spent fuel pool. The criticality analysis for the Unit 2 spent fuel storage racks has been resubmitted to the NRC in Georgia Power letter GN-1479 of August 12, 1988. The revised uncertainty allowance changes from 2.4% to 1.13% for the spent fuel racks in the Unit 2 spent fuel pool. Specification 5.6.1.2 was deleted because it was a duplicate of the information provided in Specification 5.6.1.3.

Page Affected

5-5

10. Description of the Change

Change "Appendix A of 10 CFR 55" to "10 CFR 55.59" in Specification 6.3.1 and add the following sentence at the end of the specification:
"Personnel who complete an accredited program which has been endorsed by the NRC shall meet the requirements of the accredited program in lieu of the above."

Justification of the Change

NRC Generic Letter 87-07 stated that 10 CFR 55.59 content requirements (formerly Appendix A to 10 CFR 55) can be met with a performance based program for a facility as approved by the NRC. Such a change has been requested by Georgia Power Company in its letter SE-4744 of June 14, 1988. This change incorporates the wording of the proposed change to the Unit 1 Technical Specifications contained in that letter since it is anticipated that it will be approved by NRC prior to the issuance of the Unit 2 license.

Page Affected

6-6

11. Description of the Change

Replace "as well" with "as appropriate" in Specification 3.0.5.

Justification of the Change

The terms "as well" could cause confusion to the reader of the Technical Specifications where parameters are identified for each unit specifically in either parentheses or in footnotes but not addressed specifically in the APPLICABILITY section. The combined Technical Specifications were written with the intent that the APPLICABILITY section would be applied to each unit separately unless otherwise noted in either parentheses, footnotes, or the APPLICABILITY section as appropriate. It should be noted that the Specifications contained within sections 3/4.11 and 3/4.12 are considered to apply to the Vogtle site and are not to be construed to apply to either unit specifically.

Page Affected

3/4 0-2

12. Description of the Change

Add a footnote applicable to valves HV-8809A and B stating that either valve may be closed in MODE 3 to allow testing pursuant to Specification 4.4.6.2.2.

Justification for the Change

This change has been requested for Unit 1 in Georgia Power Company letter VL-36, dated August 12, 1988, and is equally applicable to Unit 2. The change clarifies that either valve HV-8809A or B may be closed in MODE 3 to allow leakage testing of RCS pressure isolation check valves. This test method has been reviewed and approved by the NRC as documented in Supplement 7 to the SER. The NRC requested that GPC apply for this Technical Specification change by letter dated April 15, 1988.

Pages Affected

3/4 5-4
B3/4 5-2

13. Description of the Change

Replace "the" with "either" when referring to the spent fuel pool.

Justification For the Change

As described in Georgia Power letter SL-4780 of June 22, 1988, the spent fuel storage area is a common area containing 2 spent fuel pools that are joined through the spent fuel cask pit. Fuel is expected to be moved from one pool to the other and in that sense the pools are common. The common Fuel Handling Building Post Accident Ventilation system serves the area. There may be times when one of the pools contains spent fuel and the other one is empty. In order to avoid any confusion, due to Specification 3.0.5, it is necessary to state that the operability requirements apply whenever spent fuel is in either pool.

Pages Affected

3/4 3-25
3/4 3-44
3/4 9-14

14. Description of the Change

Change "meets the requirements of Regulatory Guide 1.12" to "meets the recommendations of Regulatory Guide 1.12".

Justification for the Change

The current Unit 1 Technical Specifications uses "recommendations" rather than "requirements" in referring to this Regulatory Guide in this bases section.

Page Affected

B3/4 3-4

15. Description of the Change

Insert the following statement into Specification 4.4.6.2.1, "The provisions of Specification 4.0.4 are not applicable for entry into MODE 3 or 4".

Justification for the Change

It is not reasonable to perform a Reactor Coolant System (RCS) water inventory balance during transitions from COLD SHUTDOWN to HOT STANDBY. The RCS water inventory balance should be performed when the RCS pressure is at 2235 ± 20 psig since more accurate information about RCS leakage is obtained at full pressure (check valves seat better at full pressure). Since RCS pressure isolation valve leakage has a direct affect on the RCS water inventory balance, the provisions of Specification 4.0.4 should not be applicable for entry into MODE 3 or 4 for Specification 4.4.6.2.1.d as well as for Specification 4.4.6.2.2. This change will provide consistency between the requirements of Specifications 4.4.6.2.1.d and 4.4.6.2.2.

Page Affected

2/4 4-21

16. Description of the Change

Revise the label of the temperature scale in Figure 3/4-2a, 3/4-2b, 3/4-3a, and 3/4-3b to state "Lowest Indicated RCS T_{cold} Temperature (°F)".

Justification for the Change

This change is intended to emphasize that the lowest indication of RCS temperature should be used in conjunction with this figure. The change does not represent a new or different requirement. It is intended to avoid any question that might be raised concerning the use of the figure.

Pages Affected

3/4 4-31
3/4 4-31a
3/4 4-32
3/4 4-32a

17. Description of the Change

Replace "be" with either "place Unit 1", "Place Unit 2" or "place the applicable Unit" as appropriate in ACTION statements a, b, and c. An additional change to ACTION c is proposed to change "other than ACTION a and b" to "other than that defined in ACTIONS a and b above".

Justification for the Change

The use of "place Unit 1", "place Unit 2" or "place the applicable Unit" clearly indicates the unit to which the ACTION should be applied. The proposed change to ACTION c better defines the situations when ACTION c should be applied. This change is requested to enhance the readers' understanding that ACTION c applies to the situation where there is abnormal degradation of the structural integrity which is not addressed in either ACTION a or b.

Page Affected

3/4 6-8

18. Description of the Change

Delete footnote ##.

Justification of the Change

This footnote provided a temporary exemption to the requirement to verify mercaptan prior to fuel addition to the diesel fuel oil storage tank. This exemption was needed for Unit 1 but is not required for Unit 2 because the mercaptan verification program is now in place.

Page Affected

3/4 8-5

19. Description of the Change

Add the word "Common" or "Common System" as appropriate, to Specification requirements which are common to Unit 1 and Unit 2 per Technical Specification 3.0.5 and change unit designators from "1" to "1/2" for components that are identical on both units, as described below.

- 3/4 3-50 Add "(Common System)" to title
- 3/4 3-66 Add "(Common)" to item 3c Flow to Blowdown Sump
- 3/4 3-72 Add "(Common)" to item 1a and 1b.
- 3/4 8-14 Change tags from 1 to 1/2 in LCO

Justification of the Change

Making the Technical Specifications a common document that accurately describes the systems on both units requires all Specifications that apply to both units to be designated as "Common" (see 3.0.5). Equipment tags that are called out in the specification should be designated as "1/2" if identical equipment exists on each unit. Common instrumentation is indicated by an instrument number beginning with the letter "A" in the current Unit 1 Technical Specifications. For these cases the word "Common" has been added per Specification 3.0.5.

Pages Affected

Affected pages are listed in the Description of the Change.

20. Description of the Change

The Proof and Review copy of the Combined Technical Specifications did not include figures. The proposed figures are added.

Justification for the Change

These figures are the same as the current Unit 1 figures and are also applicable to Unit 2. The unit designator on the bottom of the page has been changed to indicate that it is part of the Combined Technical Specifications, and some corrections to the use of capitalization and title locations have been made.

Pages Affected

2-2
3/4 1-22
3/4 2-3
3/4 2-5
3/4 4-26
3/4 7-24
B3/4 2-3
5-2
5-3

ENCLOSURE 2 TO LETTER GN-1483

Open Items To Be Provided to the NRC

1. Camera Ready Figures.
2. Eductor test flow rates for 4.6.2.2.d.
3. Test flow rate for Piping Penetration Area Filtration and Exhaust System for 4.7.7.
4. Provide revised action statements in the instrumentation and HVAC Specifications to reflect the combined control room design.
5. Addition of Unit 2 rooms to Table 3.7-3, Area Temperature Monitoring.

ENCLOSURE 3 TO LETTER GN-1483