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*the southern electric system*

HL-41  
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X7GJ17-H600

September 6, 1988

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

PLANT HATCH - UNIT 1  
NRC DOCKET 50-321  
OPERATING LICENSE DPR-57  
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:  
HYDROSTATIC AND LEAK TESTING  
ABOVE 212°F USING NON-NUCLEAR HEAT

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 Unit 1 Technical Specifications, Appendix A to Operating License DPR-57.

The proposed changes are related to the required reactor vessel system hydrostatic/leakage pressure testing with a non-critical reactor core at reactor coolant temperatures above 212°F. The changes supplement GPC's original Unit 1 submittal for allowing non-nuclear heat hydrostatic testing, which was provided to the NRC on March 4, 1987, and implemented in the Unit 1 Technical Specifications as Amendment 137. The proposed changes redefine the definitions of Hot and Cold Shutdown, so changing Operational Condition modes when the test is being performed and the coolant temperature is above 212°F will be unnecessary. The changes, if approved, will be consistent with the Unit 2 Technical Specifications (Amendment 91).

Enclosure 1 provides the detailed description of the proposed changes and the bases for 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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Enclosure 3 provides page change instructions for incorporating the proposed changes into the Plant Hatch Unit 1 Technical Specifications. The proposed changed Technical Specifications pages follow Enclosure 3.

Payment of a 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.

The changes described in Enclosure 1 are necessary to facilitate the startup of Plant Hatch Unit 1 from the upcoming refueling outage which is scheduled to begin September 28, 1988. Without approval of these changes, the required hydrostatic/leakage tests, which are performed on critical path, will take longer and result in capacity factor losses. Therefore, GPC requests priority approval of the proposed changes by November 11, 1988.

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. W. G. Hairston, III states he is Senior 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: W. G. Hairston, III  
W. G. Hairston, III

Sworn to and subscribed before me this 6th day of September 1988.

Joyce H. Usher  
Notary Public

GKM/ac

Notary Public, Cobb County, Ga.  
My Commission Expires May 5, 1990

Enclosures: (See next page.)

c: (See next page.)

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Enclosures:

1. Basis for Change Request.
2. 10 CFR 50.92 Evaluation.
3. Page Change Instructions.
4. Filing Fee - \$150.00

c: Georgia Power Company

Mr. H. C. Nix, Jr., General Manager - Plant Hatch  
Mr. L. T. Gucwa, Manager, Licensing and Engineering - Hatch  
GO-NORMS

U.S. Nuclear Regulatory Commission, Washington, D.C.

Mr. L. P. Crocker, Licensing Project Manager - Hatch

U.S. Nuclear Regulatory Commission, Region 1

Dr. J. N. Grace, Regional Administrator

Mr. J. E. Menning, Senior Resident Inspector - Hatch

State of Georgia

Mr. J. L. Ledbetter, Commissioner - Department of Natural Resources

ENCLOSURE 1

PLANT HATCH - UNIT 1  
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OPERATING LICENSE DPR-57  
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:  
HYDROSTATIC AND LEAK TESTING  
ABOVE 212°F USING NON-NUCLEAR HEAT  
BASIS FOR CHANGE REQUEST

Prior to the last Unit 1 maintenance/refueling outage, Georgia Power Company (GPC) historically used nuclear heat for performance of inservice hydrostatic/leakage pressure tests for the Plant Hatch units. However, the Nuclear Regulatory Commission (NRC) now requires vessel inservice hydrostatic/leakage testing per ASME Code, Section XI be performed prior to the reactor going critical after a refueling outage. The Unit 1 Technical Specifications (TS) changes to support the non-nuclear test were approved by the NRC via Amendment 137, and a leakage test using non-nuclear heat was performed during the last outage. Amendment 137 relaxed requirements on the operability of certain systems and the need to have primary containment integrity during the test when coolant temperature is above 212°F.

When the reactor coolant exceeded the 212°F, however, it was still necessary to switch Operational Condition modes (i.e., Cold Shutdown to Hot Shutdown). Changing the mode to Hot Shutdown while heating up the vessel for the test involves performing surveillances on equipment which is not needed when the unit is not preparing to start up. Because of this inconsistency, the Unit 2 submittal (approved as Amendment 91) modified the definitions of Cold and Hot Shutdown for hydrostatic/leakage testing and specified components and systems required to be operable. This proposed changes, if approved, will resolve this inconsistency for Unit 1, in a manner similar to Unit 2 Amendment 91.

PROPOSED CHANGES:

The proposed changes will modify the definitions of Cold and Hot Shutdown Conditions contained in Unit 1 Technical Specifications Section 1.0. When determining the applicability of Limiting Conditions for Operation (LCO), the revised definitions will allow the average coolant temperature to be above 212°F when performing hydrostatic/leakage tests with all control rods inserted. Also, LCOs, which specify "when the reactor coolant temperature is less than 212°F", will be interpreted as Cold Shutdown and allow coolant temperatures above 212°F when performing the tests. For compliance with Technical Specifications Action statements (e.g., "achieve the Cold Shutdown Condition within 24 hours") on equipment and systems required to be operable for the tests, an Action requiring Cold Shutdown will require a reactor coolant temperature of  $\leq 212^\circ\text{F}$ .

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:  
HYDROSTATIC AND LEAK TESTING  
ABOVE 212°F USING NON-NUCLEAR HEAT  
BASIS FOR CHANGE REQUEST

For example, with the revised definitions, the reactor vessel steam dome high pressure scram instrumentation (Table 3.1-1) will not be required during the pressure test, and the Action statement in Table 3.2-1 requiring the Cold Shutdown Condition will not apply. However, if the intermediate range monitor (IRM) high flux scram became inoperable during a test, reducing the coolant temperature to  $\leq 212^{\circ}\text{F}$  would still be required.

Clarifications have also been added to Specifications 3.5.A.2, 3.5.B.1.b, 3.5.B.2c, 3.5.C.2, 3.6.G, 3.7.C.1.a.(7), and to applicable notes in Table 3.2-1. These clarifications supplement the modified definition of Cold Shutdown by specifying equipment which must be operable during the test and will assure the test will be performed in a safe manner. The changes, if approved, will make the Technical Specifications for Unit 1 more consistent with the Unit 2 Specifications approved in Amendment 91.

A minor editorial change has also been proposed for Unit 1 Specification 4.5.C.2. This change corrects a typographical error by changing "RHR" to "RHR service water" to more accurately represent the intent of the Specification.

BASIS FOR PROPOSED CHANGES:

The systems and components required during the hydrostatic/leakage tests are similar to those specified in the Unit 2 Technical Specifications (Amendment 91). Having this equipment operable during the test will insure the hydrostatic/leakage pressure test can be performed in a safe manner, without requiring all the components and systems to be operable that are currently necessary prior to reactor startup (i.e., when the reactor is in hot shutdown). Specific components and systems required (in addition to those required for cold shutdown) are discussed below.

The integrity of secondary containment will be required during the test, and, therefore, the operability of the standby gas treatment (SBGT) system and certain instrumentation which initiates SBGT must be maintained. Specifically, Specification 3.7.C.1.a.(7) has been added to require Secondary Containment Integrity, and a note has been added to Table 3.2-1 requiring that the vessel water level (Level 2) instrumentation be operable during the test. Since the SBGT system is operable, the refueling floor and reactor building exhaust vent radiation monitors (Table 3.2-8) will be required. The high drywell pressure scram will not be required, since primary containment integrity is not required. (See Amendment 137 for Unit 1 and Amendment 91 for Unit 2.)

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:  
HYDROSTATIC AND LEAK TESTING  
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BASIS FOR CHANGE REQUEST

GPC's revised definition of the Cold Shutdown Condition will require operability of the reactor protection system (RPS) scram trip signals (Table 3.1-1) including the mode switch in shutdown, manual scram, IRM high flux, and scram discharge volume high level. These trips are currently required for Cold Shutdown conditions and will also be required during a leakage test when the reactor coolant temperature exceeds 212°F.

Operability requirements for the auxiliary electrical systems, including emergency diesel generators, will be as specified in Section 3.9. No changes to the Technical Specifications are required. Specification 3.5.B.1.b has been modified to require one residual heat removal (RHR) loop with two pumps or two loops with one pump per loop operable in the low pressure coolant injection (LPCI) mode, as well as in the shutdown cooling mode as is presently required. The current Technical Specifications require one RHR service water loop to be operable during the hydrostatic/leakage tests. These systems will be adequate to keep the core cool in the event of a piping system leak, since stored energy in the reactor core and containment will be low under pressure testing conditions.

Operability specifications for conductivity and chloride will be as stated in Specification 3.6.F.2.d. Reactor coolant leakage monitoring (Specification 3.6 G) will not be required, since the hydrostatic/leakage tests are a requirement of ASME Code, Section XI, and are subject to the criteria specified in the Code for determination of an acceptable test.



ENCLOSURE 2

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ABOVE 212°F USING NON-NUCLEAR HEAT  
10 CFR 50.92 EVALUATION

PROPOSED CHANGES:

The proposed changes add a footnote to Technical Specifications Section 1.0, modifying the Operational Condition definitions of Hot Shutdown and Cold Shutdown during non-nuclear hydrostatic/leak testing per ASME Code, Section XI requirements. The revised definitions will allow for the reactor to be considered in Cold Shutdown during the performance of a test, even when the reactor coolant temperature is above 212°F. The proposed changes also revise Technical Specifications to require secondary containment integrity and to require certain core and containment cooling systems be operable when performing the tests. Since hydrostatic/leak tests are performed water solid with all rods inserted into the reactor core at low decay heat values, and at or near Cold Shutdown Condition, the stored energy in the core and containment will be very small. The amount of reactivity contained in any postulated steam leak would also be small. Additionally there is a proposed change that clarifies one Specification 4.5.C.2.

Basis for No Significant Hazards Consideration Determination:

The proposed changes do not involve a significant hazards consideration for the following reasons:

1. They do not involve a significant increase in the probability or consequences of an accident previously evaluated, because the hydrostatic/leak tests to which these changes apply occur when primary system energy is minimal; all control rods are inserted; and low temperature and low fuel decay heat values are established. Under these test conditions, the systems specified to be operable will function to ensure a significant increase in the consequences or the probability of an accident will not occur.
2. The proposed changes do not create the possibility of a new or different kind of accident from any previously analyzed, because no change in plant design or operation will occur as a result of the change. The changes described herein apply only to the performance of ASME Code-required hydrostatic or leak testing (with all control rods inserted), and are in addition to those changes granted with Amendment 137.

ENCLOSURE 2 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:  
HYDROSTATIC AND LEAK TESTING  
ABOVE 212°F USING NON-NUCLEAR HEAT  
10 CFR 50.92 EVALUATION

3. The proposed changes do not involve a significant reduction in the margin of safety, because plant operation is not affected, and analyzed margins of safety are unchanged.

The proposed editorial change which changes "RHR" to "RHR service water" in Specification 4.5.C.2 corrects a typographical error, and is administrative in nature.



ENCLOSURE 3

PLANT HATCH - UNIT 1  
NRC DOCKET 50-321  
OPERATING LICENSE DPR-57  
REQUEST TO REVISE TECHNICAL SPECIFICATIONS  
TO ALLOW PERFORMANCE OF HYDROSTATIC  
AND LEAK TESTING ABOVE 212°F USING NON-NUCLEAR HEAT  
PAGE CHANGE INSTRUCTIONS

The proposed change to the Unit 1 Technical Specifications (Appendix A to Operating License DPR-57) will be incorporated as follows:

<u>Remove Page</u>	<u>Insert Page</u>
1.0-1	1.0-1
1.0-2	1.0-2
3.2-4	3.2-4
3.5-2	3.5-2
3.5-3	3.5-3
3.5-4	3.5-4
3.5-5	3.5-5
3.6-7	3.6-7
3.7-12	3.7-12