Georgia Power Company
333 Piedmont Avenue
Atlanta, Georgia 30308
Telephone 404 526-6526

Mailing Address:
Post Office Box 4545
Atlanta, Georgia 30302

W. G. Hairston, III
Senior Vice President
Nuclear Operations

the southern electric system

HL-31
2107C
X7GJ17-H600

September 6, 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. Because of high summer temperatures and a prolonged drought 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. In the past, Plant Hatch has 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 a permanent Technical Specifications change to increase the operating suppression pool temperature limit from 95°F to 100°F. Enclosures 1 and 2, in conjunction with the Reference 1 report, contain the justification for the increase to 100°F. This submittal is similar to our May 13, 1988 Technical Specification submittal which proposed removal of the operating suppression pool temperature limit, and required pool cooling to be initiated at 100°F and a reactor shutdown at 110°F. Since GPC would gain significant operating flexibility from removal of the operating pool temperature limit, we request that the May 13, 1988, Technical Specifications amendment request continue to undergo NRC review and be granted after this Technical Specification amendment.

A001 w/check $150 #096658

Enclosure 1 provides the detailed descriptions of the 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.

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.

Reference 1 is a safety evaluation prepared by General Electric Company justifying the deletion of the operating limit on the suppression pool temperature. It was submitted as Enclosure 4 of GPC's May 13, 1988 submittal and, therefore, is not included in this submittal.

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. 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.

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

Notary Public

GKM/ac

2107C

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

Reference:
1. "Elimination of the Suppression Pool Temperature Limit for Plant Hatch Units 1 and 2," EAS-19-0388.

c: Georgia Power Company
Mr. H. C. Nix, Jr., General Manager - 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 II
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

Georgia Power

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 CHANGE:

The proposed amendments to the Unit 1 and Unit 2 Technical Specifications will raise the 95°F Limiting Condition for Operation (LCO) on suppression pool temperature to 100°F. The 105°F limit on allowable pool temperature during safety system testing which adds heat to the suppression pool, will not be changed. Also, the suppression pool temperature limit (SPTL) requiring immediate plant shutdown (110°F) and vessel depressurization (120°F) will remain unchanged. Reference 1, a Plant Hatch-specific evaluation performed by General Electric Company, demonstrates the design basis requirements are satisfied as long as the operating limits are less than the 110°F SPTL requiring immediate shutdown. The increase in the operating SPTL to 100°F (proposed herein) is bounded by the analyses presented in Reference 1.

Basis for Proposed Change:

Historically, the SPTL 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 Boiling Water Reactor Owners Group (BWROG) SPTL Committee show the normal operating SPTL for BWRs with Mark I Containments can be raised to 110°F with no adverse impact on safety.

Reference 1 (EAS-19-0388) details the results of the Plant Hatch evaluations and provides the technical bases bounding 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.

Georgia Power

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 CHANGE:

The proposed change will modify Unit 1 Technical Specification 3.7.A.1.c and 3.7.a.1.d to increase the operating suppression pool water temperature limit from 95°F to 100°F. Similarly, the Unit 2 Limiting Condition for Operation Specification 3.6.2.1.b and the resulting Action Statement will be modified to reflect the change in the operating temperature limit to 100°F.

Basis for Proposed Change:

See Enclosure 1 and Reference 1 for a detailed description of the safety basis for the proposed change. Based on these documents, the following conclusions can be drawn:

This change does 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 immediate shutdown (scram) and depressurization limits, and the allowable operating temperature limit of 105°F when performing testing (adding heat to the pool) are unchanged.

The possibility of a different kind of accident from any analyzed previously is not created by this change, since the proposed change 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 this change, because the impact of the proposed pool temperature has been evaluated relative to safety analyses (Reference 1), 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.