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the southern electric system

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June 7, 1988

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

PLANT VOGTLE - UNIT 1
NRC DOCKET 50-424
OPERATING LICENSE NPF-68
REQUEST TO REVISE TECHNICAL SPECIFICATION 4.8.4.2.c

Gentlemen:

In accordance with 10 CFR 50.90 and 10 CFR 50.59(c)(1), Georgia Power Company (GPC) hereby proposes to amend the Vogtle Electric Generating Plant Unit 1 Technical Specifications, Appendix A to Operating License NPF-68.

Specification 4.8.4.2.c currently requires that safety-related valve thermal overload protection bypass devices listed in Table 3.8-1 be verified to be operable at least once per 18 months during shutdown. The proposed amendment would allow this operability verification to be performed during conditions other than shutdown.

Enclosure 1 provides a detailed description of the proposed change and the basis for the change.

Enclosure 2 details the basis for our determination that the proposed amendment does not involve significant hazards considerations.

Enclosure 3 provides instructions for incorporating the proposed amendment into the Technical Specifications. The proposed revised page follows Enclosure 3.

In accordance with 10 CFR 170.12, a check for \$150.00 is enclosed in payment of the required application fee.

A copy of this letter and all applicable enclosures will be sent to the designated state official in accordance with 10 CFR 50.91.

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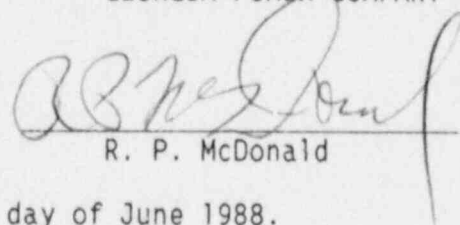
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U. S. Nuclear Regulatory Commission
June 7, 1988
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Mr. R. P. McDonald states that he is an Executive Vice President of Georgia Power Company and is authorized to execute this oath on behalf of Georgia Power Company, and that to the best of his knowledge and belief, the facts set forth in this letter and enclosures are true.

GEORGIA POWER COMPANY

By: 
R. P. McDonald

Sworn to and subscribed before me this 7th day of June 1988.


Notary Public

Notary Public, Clayton County, Ga.
My Commission Expires Oct. 15, 1991

JH/im

Enclosures:

1. Basis for Proposed Change
2. 10 CFR 50.92 Evaluation
3. Instructions for Incorporation
4. Check for Application Fee

c: Georgia Power Company
Mr. P. D. Rice
Mr. G. Bockhold, Jr.
GO-NORMS

U. S. Nuclear Regulatory Commission
Dr. J. N. Grace, Regional Administrator
Mr. J. B. Hopkins, Licensing Project Manager, NRR (2 copies)
Mr. J. F. Rogge, Senior Resident Inspector-Operations, Vogtle

ENCLOSURE 1

PLANT VOGTLE - UNIT 1
NRC DOCKET 50-424
OPERATING LICENSE NPF-68
REQUEST TO REVISE TECHNICAL SPECIFICATION 4.8.4.2.c
BASIS FOR PROPOSED CHANGE

PROPOSED CHANGE

Revise Specification 4.8.4.2.c by deleting the words "during shutdown".

BASIS

This change allows verification of safety-related valve motor operator thermal overload protection bypass devices to be performed during any mode of plant operation. The nature of this surveillance activity does not require that it be limited to shutdown modes. Verification of operability is performed by visually inspecting the bypass devices to ensure that the leads are affixed correctly. Removal of the shutdown requirement for this surveillance would allow greater scheduling flexibility and more efficient use of manpower during refueling outages.

ENCLOSURE 2

PLANT VOGTLE - UNIT 1
NRC DOCKET 50-424
OPERATING LICENSE NPF-68
REQUEST TO REVISE TECHNICAL SPECIFICATION 4.8.4.2.c
10 CFR 50.92 EVALUATION

In accordance with 10 CFR 50.92, GPC has evaluated the attached proposed amendment to the Technical Specifications and has determined that operation of the facility in accordance with the proposed amendment would not involve significant hazards considerations. The basis for this determination is as follows:

PROPOSED CHANGE

Revise Specification 4.8.4.2.c by deleting the words "during shutdown".

BACKGROUND

The subject surveillance test consists of a visual inspection to ensure that the leads of the thermal overload protection bypass devices are affixed correctly. The surveillance does not involve lifting of leads or connection of test equipment. Since the surveillance test does not involve any change in the operating configuration of the plant, it could be performed during any operating mode without adverse safety consequences.

ANALYSIS

GPC has reviewed the above proposed change and has determined that the change does not involve significant hazards considerations. In support of this conclusion, the following analysis is provided.

1. The proposed change does not significantly increase the probability or consequences of previously evaluated accidents. Performance of the subject surveillance requirement during modes other than shutdown does not affect operation of the applicable valves since no manipulation of the bypass devices is involved. Operation or mitigation of previously evaluated accidents is, therefore, not adversely affected by the change. The probability and consequences of such accidents are therefore not increased.

ENCLOSURE 2 (Continued)

10 CFR 50.92 EVALUATION

2. The proposed change does not create the possibility of a new or different kind of accident than any accident previously evaluated. The change affects only the operating mode in which a surveillance requirement may be performed. Performance of the surveillance during power operation does not introduce a new failure mode since the surveillance consists of a visual inspection only. The change does not introduce any new equipment into the plant or require any existing equipment to be operated in a different manner from which it was designed to operate. Since no new mode of failure is created, a new or different kind of accident could not result.
3. The proposed change does not significantly reduce a margin of safety. The change does not reduce the frequency of the subject surveillance activity or decrease the effectiveness of the surveillance test. The change does not affect operation of the thermal overload protection bypass devices. The change does not affect any safety limit or limiting safety system setting. Margins of safety are therefore not reduced.

CONCLUSION

Based on the preceding analysis, GPC has determined that the proposed change to the Technical Specifications will not significantly increase the probability or consequences of an accident previously evaluated, or significantly reduce a margin of safety. GPC therefore concludes that the proposed change meets the requirements of 10 CFR 50.92(c) and does not involve significant hazards considerations.

ENCLOSURE 3

PLANT VOGTLE - UNIT 1
NRC DOCKET 50-424
OPERATING LICENSE NPF-68
REQUEST TO REVISE TECHNICAL SPECIFICATION 4.8.4.2.c
INSTRUCTIONS FOR INCORPORATION

The proposed amendment to the Technical Specifications (Appendix A to Operating License NPF-68) would be incorporated as follows:

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Insert Page

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