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April 30, 1986

Director of Nuclear Reactor Regulation
Attention: Mr. D. Muller, Project Director
BWR Project Directorate No. 2
Division of Boiling Water Reactor Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
EDWIN I. HATCH NUCLEAR PLANT UNITS 1, 2
ASME CODE SECTION XI - HYDROSTATIC LEAK TEST

Gentlemen:

Recently Georgia Power Company (GPC) has had discussions with the NRC staff regarding interpretation of ASME Code Section XI, 1980 Edition, Article IWB-5000 ("System Pressure Tests"). During an exit interview, an NRC inspector identified this as an unresolved item.

The focus of the discussion is Note 5 of ASME Code Table IWB-2500-1 examination category B-P (for all pressure retaining components). Note 5 states that "the system leakage test (IWB-5221) shall be conducted prior to plant startup following each reactor refueling outage." GPC's position is that "plant startup", as used in Note 5, means prior to placing the unit in service, which, more precisely, we define as prior to admitting steam to the turbine. Such definition permits utilizing nuclear steam in the system leakage test after placing the reactor mode switch in the STARTUP/HOT STANDBY position and pulling control rods. Not only has this been GPC's historical practice at Plant Hatch, but we also believe this practice to be preferred. The nuclear steam system leakage test performed in this "hot" mode is less detrimental to the reactor pressure vessel and components than performing the leakage test under colder conditions due to greater thermal margins between vessel temperature and calculated nil ductility temperature. Leakage under hot conditions is more readily detectable under this approach since elevated temperature would tend to open leakage paths.

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In reaching our conclusion, we rely, in part, upon the Note's contrasting use of the words "plant" and "reactor", clearly indicating different entities. Further, the general definition of the word "components" (IWA-2110(h)) supports the proposition that the "plant" is broad in scope, encompassing subparts therein, such as reactor vessels. Consistent with these interpretative aids, reactor start-up is permitted following each reactor refueling outage prior to system leakage test; but plant start-up is limited by the test precondition.

We understand that, although a definitive interpretation by the NRC has not been adopted, discussions within the NRC on this Code provision have viewed the language as precluding GPC's practice of nuclear heatup to perform leakage tests. Since we may be in disagreement with the NRC interpretation concerning the use of nuclear heat, and since startup of Plant Hatch Unit 1 from a refueling outage is imminent, we hereby request temporary relief from the possible NRC interpretation of Note 5 prohibiting the withdrawal of control rods. Such relief would permit us to return Plant Hatch Unit 1 to service and provide suitable opportunity to resolve the issue. If temporary relief is not acceptable, we will, of course, pursue alternate hydro procedures which could prolong the outage for four (4) to seven (7) days. If such alternate procedures are used, GPC will pursue Commission review of what is viewed as a change in interpretation by the staff (10 CFR 50.109).

Sincerely yours,



L. T. Gucwa

LTG/mb

xc: Mr. J. P. O'Reilly
Mr. J. T. Beckham, Jr.
Mr. H. C. Nix, Jr.
Dr. J. N. Grace (NRC-Region II)
Senior Resident Inspector