ENCLOSURE 1

PLANT HATCH - UNIT 1 NRC DOCKET 50-321 OPERATING LICENSE DPR-57 REQUEST TO REVISE TECHNICAL SPECIFICATIONS: DEFINITION OF SURVEILLANCE FREQUENCY BASIS FOR CHANGE REQUEST

The definition of "Surveillance Frequency" as provided in Section 1.0 of the current Plant Hatch Unit 1 Technical Specifications, is as follows:

Periodic surveillance tests, checks, calibrations, and examinations shall be performed within the specified surveillance intervals. These intervals may be adjusted plus or minus 25%. The operating cycle interval as pertaining to instrument and electrical surveillance shall never exceed 15 months. In the case where the elapsed interval has exceeded 100% of the specified interval, the next surveillance interval shall commence at the end of the original specified interval.

The Plant Hatch Unit 1 Technical Specifications, which are in "custom" format, do not contain a "Surveillance Frequency Notation" table, as is provided in Table 1.1 of Standard Technical Specifications (STS). This STS table defines the operating cycle interval as being equal to 18 months. Moreover, Specification 4.0.2 of STS provides that all surveillances, including those performed on a once per cycle (18 month) basis, may be performed with a maximum allowable extension not to exceed 25% of the surveillance interval.

The present Plant Hatch Unit 1 definition, as provided above, is thus restrictive with respect to the NRC approved STS, in that; 1) The operating cycle interval is restrained to 15, rather than 18, months, and; 2) The current wording can be interpreted to imply that the 25% grace period is not applicable to once per cycle surveillances.

In order to provide requirements consistent with STS and Plant Hatch Unit 2, a change is proposed to the above definition. The proposed change would replace the sentence "The operating cycle interval as pertaining to instrument and electrical surveillance shall never exceed 15 months." with the sentence "The operating cycle interval is defined as 18 months." This proposed change accomplishes two purposes: 1) It removes the restrictions with respect to STS; and, 2) It provides a definition of the time interval which equals an operating cycle. This second purpose is necessary because the Plant Hatch Unit 1 Technical Specifications do not define this interval elsewhere.

Actual plant trip setpoints for instruments and electrical equipment are set conservative with respect to Technical Specification allowable values, and are calculated such that the allowable values will not be

8707230630 870713 PDR ADDCK 05000321 PDR

1474C SL-2813

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS: DEFINITION OF SURVEILLANCE FREQUENCY BASIS FOR CHANGE REQUEST

compromised by instrument drift during the operating cycle, as this would result in a violation of Technical Specifications. The actual setpoints must be adjusted appropriately to accommodate longer cycles. Thus, application of the longer surveillance interval for instruments and electrical equipment will not result in increased probability that a Technical Specifications allowable value could be exceeded.

This change is requested to accommodate the potential that the current cycle 11 will exceed 15 months in duration. In order to preclude a potential shutdown solely for the performance of surveillances, it is requested that the proposed change be approved on a timely basis.

7/13/87

ENCLOSURE 2

PLANT HATCH - UNIT 1 NRC DOCKET 50-321 OPERATING LICENSE NO. DPR-57 REQUEST TO REVISE TECHNICAL SPECIFICATIONS: DEFINITION OF SURVEILLANCE FREQUENCY 10 CFR 50.92 EVALUATION

Pursuant to the requirements of 10 CFR 50.92, Georgia Power Company has evaluated the proposed amendments for Plant Hatch Unit 1 and has determined that its adoption would not involve a significant hazards consideration. The basis for this determination is as follows:

Proposed Change:

The definition of "Surveillance Frequency" as provided in Section 1.0 of the current Plant Hatch Unit 1 Technical Specifications, is as follows:

Periodic surveillance tests, checks, calibrations, and examinations shall be performed within the specified surveillance intervals. These intervals may be adjusted plus or minus 25%. The operating cycle interval as pertaining to instrument and electrical surveillance shall never exceed 15 months. In the case where the elapsed interval has exceeded 100% of the specified interval, the next surveillance interval shall commence at the end of the original specified interval.

The Plant Hatch Unit 1 Technical Specifications, which are in "custom" format, do not contain a "Surveillance Frequency Notation" table, as is provided in Table 1.1 of Standard Technical Specifications (STS). This STS table defines the operating cycle interval as being equal to 18 months. Moreover, Specification 4.0.2 of STS provides that all surveillances, including those performed on a once per cycle (18 month) basis, may be performed with a maximum allowable extension not to exceed 25% of the surveillance interval.

The present Plant Hatch Unit 1 definition, as provided above, is thus restrictive with respect to the NRC approved STS, in that; 1) The operating cycle interval is restrained to 15, rather than 18, months, and; 2) The current wording can be interpreted to imply that the 25% grace period is not applicable to once per cycle surveillances.

In order to provide requirements consistent with STS and Plant Hatch Unit 2, a change is proposed to the above definition. The proposed change would replace the sentence "The operating cycle interval as pertaining to instrument and electrical surveillance shall never exceed 15 months." with the sentence "The operating cycle interval is defined as 18 months." This proposed change accomplishes two purposes: 1) It removes

ENCLOSURE 2 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS: DEFINITION OF SURVEILLANCE FREQUENCY 10 CFR 50.92 EVALUATION

the restrictions with respect to STS; and, 2) It provides a definition of the time interval which equals an operating cycle. This second purpose is necessary because the Plant Hatch Unit 1 Technical Specifications do not define this interval elsewhere.

Basis:

This proposed change implements requirements presently contained in NRC approved Standard Technical Specifications, including the Plant Hatch Unit 2 Technical Specifications.

Actual plant trip setpoints for instruments and electrical equipment are set conservative with respect to Technical Specification allowable values, and are calculated such that the allowable values will not be compromised by instrument drift during the operating cycle, as this would result in a violation of Technical Specifications. The actual setpoints must be adjusted appropriately to accommodate longer cycles. Thus, application of the longer surveillance interval for instruments and electrical equipment will not result in increased probability that a Technical Specifications allowable value could be exceeded.

The proposed change does not involve a significant increase in the probability or consequences of an accident because the same level of assurance will be provided that equipment setpoints remain within Technical Specification limits.

The possibility of a different kind of accident from those analyzed previously is not created by this change, since the design function of systems, as described in the FSAR, is not affected.

Margins of safety are not significantly reduced by this change. This change only provides for a definition of operating cycle interval which is consistent with NRC approved requirements contained in Standard Technical Specifications.

ENCLOSURE 3

PLANT HATCH - UNIT 1 NRC DOCKET 50-321 OPERATING LICENSE DPR-57 REQUEST TO REVISE TECHNICAL SPECIFICATIONS: DEFINITION OF SURVEILLANCE FREQUENCY PAGE CHANGE INSTRUCTIONS

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

Remove Page

Insert Page

1.0-6

1.0-6

.

- GG. <u>Simulated Automatic Actuation</u> Simulated automatic actuation means applying a simulated signal to the sensor to actuate the circuit in question.
- HH. Start & Hot Standby Mode The reactor is in the Start & Hot Standby Mode when the Mode Switch is in the START & HOT STANDBY position. In this mode the reactor protection system is energized with IRM and APRM (Start & Hot Standby Mode) neutron monitoring system trips and control rod withdrawal inter-locks in service.
- II. <u>Surveillance Frequency</u> Periodic surveillance tests, checks, calibrations, and examinations shall be performed within the specified surveillance intervals. These intervals may be adjusted plus or minus 25%. The operating cycle interval is defined as 18 months. In the case where | the elapsed interval has exceeded 100% of the specified interval, the next surveillance interval shall commence at the end of the original specified interval.
- JJ. <u>Surveillance Requirements</u> The surveillance requirements are requirements established to ensure that the Limiting Conditions for Operation as stated in Section 3 of these Technical Specifications are met. Surveillance requirements are not required on systems or parts of systems that are not required to be operable or are tripped. If tests are missed on parts not required to be operable or are tripped, then they shall be performed prior to returning the system to an operable status.
- KK. <u>Total Peaking Factor (TPF)</u> The total peaking factor is the highest product of radial, axial, and local peaking factors simultaneously operative at any segment of fuel rod.
- LL. <u>Transition Boiling</u> Transition boiling is the boiling that occurs between nucleate and film boiling. Transition boiling is manifested by an unstable fuel cladding surface temperature, rising suddenly as steam blanketing of the heat transfer surface occurs, then dropping as the steam blanket is swept away by the coolant flow, then rising again.

- . . .