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March 20, 1989

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: CHANGES TO INLINE CONDUCTIVITY MEASUREMENT FREQUENCY SPECIFICATION

### 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 a change to the Plant Hatch Unit 1 Technical Specifications, Appendix A to Operating License DPR-57.

The current Technical Specifications for Plant Hatch-Unit 1 require reactor coolant conductivity sampling be obtained once every 4 hours when the continuous conductivity monitor is inoperable. GPC proposes a permanent Technical Specifications change to provide for changing the sampling requirements, when the continuous monitor is inoperable, from once every 4 hours in any mode of operation to once every 24 hours when the reactor coolant temperature is less than or equal to 212°F. When the reactor coolant temperature is greater than 212°F, the sampling frequency would remain at once every 4 hours.

This amendment would incorporate into Unit 1 Specification 4.6.F.2 the Standard Technical Specifications (STS) surveillance frequency requirements for reactor coolant conductivity sampling when the continuous monitor is inoperable (GE-STS [BWR/4], Section 4.4.4.c., page 3/4 4-13). GPC proposes the current Unit 1 format remain unchanged. The amended specification also agrees with the requirements of the Technical Specifications for Plant Hatch-Unit 2 (Section 4.4.4.c.) for operational conditions at less than or equal to 212°F.

Enclosure 1 provides a detailed description of the proposed change and the circumstances necessitating the change request.

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

Enclosure 3 provides page change instructions for incorporating the proposed change into the Technical Specifications. The proposed changed page for Unit 1 follows Enclosure 3.

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. S. Hart M. W. G. Hairston, III

Sworn to and subscribed before me this 20th day of March 1989.

Sherry ann Mitchel Notary Public

MY COMMISSION EXPIRES DEC. 15, 1992

GKM/eb

Enclosures:

- 1. Basis for Change Request.
- 2. 10 CFR 50.92 Evaluation.
- 3. Page Change Instructions.

c: (See next page.)

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c: <u>Georgia Power Company</u> Mr. H. C. Nix, Jr., General Manager - Hatch Mr. L. T. Gucwa, Manager, Engineering & Licensing - Hatch GO-NORMS

<u>U. S. Nuclear Regulatory Commission, Washington, D.C.</u> Mr. L. P. Crocker, Licensing Project Manager - Hatch

U. S. Nuclear Regulatory Commission, Region II Mr. S. D. Ebneter, Regional Administrator Mr. J. E. Menning, Senior Resident Inspector - Hatch

<u>State of Georgia</u> Mr. J. L. Ledbetter, Commissioner - Department of Natural Resources

### ENCLOSURE 1

# PLANT HATCH - UNIT 1 NRC DOCKET 50-321 OPERATING LICENSE DPR-57 REQUEST TO REVISE TECHNICAL SPECIFICATIONS: CHANGES TO INLINE CONDUCTIVITY MEASUREMENT FREQUENCY SPECIFICATION BASIS FOR CHANGE REQUEST

### PROPOSED CHANGE:

The proposed amendment to the Unit 1 Technical Specifications (specifically, Specification 4.6.F.2.a.1) would change the reactor coolant conductivity sampling, when the continuous conductivity monitor is inoperable, from once every 4 hours in any mode of operation to once every 24 hours when the reactor coolant temperature is less than or equal to 212°F. When the reactor coolant temperature is greater than 212°F, the sampling frequency would remain at once every 4 hours.

#### Basis for Proposed Change:

The request to change the reactor coolant conductivity sampling requirements when the continuous conductivity monitor is inoperable is necessary to provide relief from the 4-hour sampling requirements of the current Unit 1 Technical Specifications. This proposed change is consistent with the NRC-approved sampling frequencies established in the Standard Technical Specifications requirements for conductivity sampling (GE-STS [BWR/4], Section 4.4.4.c., page 3/4 4-13).

Adoption of the proposed change will make the requirements of the Unit 1 Technical Specifications consistent with those of Unit 2. The sampling requirements can be relaxed when the reactor coolant temperature is less than or equal to 212°F, because, at these lower temperatures, the temperature-dependent corrosion rates are lower, thereby providing more time in which to discover the abnormal reactor water chemistry condition and take corrective action. Although high conductivity in itself does not cause stainless steel stress corrosion cracking, it can indicate the possible presence of a high chloride concentration in the coolant. Chlorides can be a contributor to stress corrosion cracking. (Reference Unit 1 Technical Specifications, Bases Section 3.6.F, pages 3.6-18 and 3.6-19.) Since the corrosion rate is temperature-dependent, it is more important to guickly identify a high conductivity (and possible high chloride) condition when the coolant temperature is high, hence, the need for the 4-hour sampling frequency requirement when the coolant temperature is greater than 212°F. However, as stated previously, it is not necessary to quickly identify a high conductivity condition when the coolant is less than or equal to 212°F because of the lower corrosion rate at a lower temperature; hence a 24-hour sampling frequency is sufficient to discover a problem and take corrective action.

# ENCLOSURE 2

# PLANT HATCH - UNIT 1 NRC DOCKET 50-321 OPERATING LICENSE DPR-57 REQUEST TO REVISE TECHNICAL SPECIFICATIONS: CHANGES TO INLINE CONDUCTIVITY MEASUREMENT FREQUENCY SPECIFICATION 10 CFR 50.92 EVALUATION

## PROPOSED CHANGE:

As discussed in the Basis for Change Request, the proposed amendment to the Unit 1 Technical Specifications (specifically, Specification 4.6.F.2.a.1) would change the reactor coolant conductivity sampling, when the continuous conductivity monitor is inoperable, from once every 4 hours in any mode of operation to once every 24 hours when the reactor coolant temperature is less than or equal to 212°F. When the reactor coolant temperature is greater than 212°F, the sampling frequency would remain at once every 4 hours.

## Basis for Proposed Change:

See Enclosure 1 for a detailed description of the safety basis for the proposed change. Based on that information, the following conclusions can be drawn:

- o This change does not involve a significant increase in the probability or consequences of an accident, because the operation of any plant equipment or system is not affected.
- o The possibility of a different kind of accident from any analyzed previously is not created by this change, since the change does not affect the operation of any plant equipment or system. Therefore, no new modes of plant operation are introduced, and no new accident types can result.
- o Margins of safety are not significantly reduced by this change, since the proposed change relaxes the surveillance interval only when the reactor coolant is less than or equal to 212°F at which temperature the corrosion rate is low. Additionally the change is consistent with the Standard Technical Specifications for reactor coolant sampling when the continuous monitor is inoperable. No other Specifications are affected by this change.