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the southern electric system

W. G. Hairston, III
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February 22, 1990

U.S. Nuclear Regulatory Commission
ATTN: Mr. S. D. Ebnetter
Regional Administrator - Region II
Suite 2900
101 Marietta Street, N.W.
Atlanta, Georgia 30323

PLANT HATCH - UNIT 1
NRC DOCKET 50-321
OPERATING LICENSE DPR-57
DISCRETIONARY ENFORCEMENT REGARDING
RHR SHUTDOWN COOLING

Gentlemen:

On February 21, 1990, in a conversation between representatives of Georgia Power Company (GPC), NRC-Region II, and NRC-Nuclear Reactor Regulation (NRR), GPC requested temporary relief from the requirements of Unit 1 Technical Specifications (TS) Table 3.2-1, item 1. This discretion was needed to allow continued operation of the Residual Heat Removal (RHR) System in the shutdown cooling (SDC) mode until an inoperable reactor water level instrument could be replaced. The NRC based their decision to grant discretionary enforcement on the information discussed during the phone call, and confirmed it via another telephone conversation with GPC later the same day.

Plant Hatch Unit 1 shut down on 2/17/90 for a scheduled condenser retubing and refueling outage. The RHR system is routinely used in the SDC mode to remove decay and sensible heat from the fuel/vessel prior to defueling. In the SDC mode the RHR System takes suction from the "B" recirculation loop, cools the primary system fluid by passing it through an RHR heat exchanger, and then discharges the water back to the vessel. Because the piping represents a potential flow path for draining the vessel, the suction side piping is equipped with two isolation valves (1E11-F008, F009) which close automatically on low reactor water level (Level 3).

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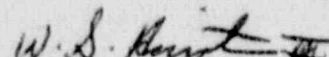
During performance of an 18-month calibration, one reactor water level transmitter (1B21-N080A) was found to be out of procedural tolerance, and efforts to recalibrate the instrument were unsuccessful. The instrument would still perform its function, but would send an isolation signal to the valve at a less conservative setpoint than specified, and was therefore considered inoperable. Unit 1 Technical Specifications (TS) Section 3.2 (Table 3.2-1, Item 1) requires isolation of the SDC System, because there are no longer two operable channels per trip system. Note that in this situation, Unit 1 TS requirement 3.5.B.1.b conflicts with Table 3.2-1, in that it requires the RHR SDC mode to be operable when irradiated fuel is in the vessel.

Representatives from NRR and Region II agreed that isolation of SDC was not desirable considering the plant configuration. The unit is in cold shutdown with the reactor head removed and the reactor cavity being filled in preparation for refueling activities. Current levels of decay heat in the fuel could cause reactor temperature to eventually exceed 212°F which would technically place the unit in an undefined condition. To preclude this increase in coolant temperature the decay heat would have to be removed by other means. Operation of SDC with one inoperable level instrument does not place the unit in an unsafe condition, since the SDC isolation function is still single failure proof. The A and C water level transmitters are utilized in the logic of one trip system and either instrument can cause the inboard isolation valve to close. Likewise, either the B or D transmitter can shut the outboard valve.

Because of the desire to not isolate SDC and the relatively low safety significance of this problem, the NRC granted verbal discretionary enforcement to continue SDC operation until the reactor level instrument 1B21-N080A can be returned to service. Replacement is expected to be complete February 22, 1990.

Please contact this office if you have questions.

Sincerely,


W. G. Hairston, III

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c: (See next page.)

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c: Georgia Power Company
Mr. H. C. Nix, General Manager - Nuclear Plant
Mr. J. D. Heidt, Manager Engineering and Licensing - 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
Mr. J. E. Menning, Senior Resident Inspector - Hatch