



Georgia Power

Electricity that works for you

J. T. Beckham, Jr.
Vice President—Nuclear
Hatch Project

July 11, 1991

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

HL-1664

PLANT HATCH - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
REVISION TO SNUBBER VISUAL INSPECTION INTERVALS
IN ACCORDANCE WITH GENERIC LETTER 90-09

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 - Units 1 and 2 Technical Specifications (TS), Appendix A to Operating Licenses DPR-57 and NPF-5.

Georgia Power Company (GPC) proposes changes which reference Generic Letter 90-09, "Alternate Requirements for Snubber Visual Inspection Intervals and Corrective Actions." This proposed change will provide consistency with the current guidance recommended by Generic Letter 90-09, maintain the same confidence level as the present visual surveillance requirements, and reduce radiation exposure for plant personnel. Revisions to the wording of the Generic Letter 90-09 proposed technical specifications were made to maintain consistency with the current Hatch technical specification definition of snubber categorization and disposition of visual failures. The revision of these requirements necessitates revised page and paragraph numbers and minor wording revisions throughout the remainder of the section. Certain Technical Specifications regarding snubber surveillance requirements have been revised to reflect the recommended surveillance requirements set forth in Generic Letter 90-09.

Enclosure 1 provides a detailed description of the proposed change.

Enclosure 2 details the basis for our determination that the proposed change does not involve a significant hazards consideration.

Enclosure 3 provides page change instructions for incorporating the proposed change into the TS. The proposed changed TS pages, along with a marked-up copy of the current TS pages, follow Enclosure 3.

To allow time for orderly incorporation into copies of the TS, 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.

Nuclear Regulatory Commission

July 11, 1991

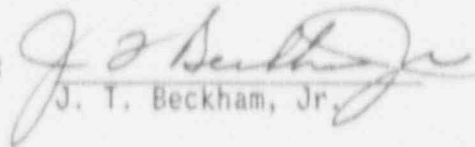
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In accordance with the requirements of 10 CFR 50.91, a copy of this letter and all applicable enclosures will be sent to Mr. L. Barrett of the Environmental Protection Division of the Georgia Department of Natural Resources.


Mr. J. T. Beckham, Jr. states that he is Vice President - Plant Hatch 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:


J. T. Beckham, Jr.

Sworn to and subscribed before me this 11 day of July, 1991.


Notary Public
MY COMMISSION EXPIRES APRIL 10, 1993

JTB/JMG

Enclosure:

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

cc: Georgia Power Company

Mr. H. L. Sumner, Jr., General Manager - Plant Hatch
NORMS

U. S. Nuclear Regulatory Commission, Washington, DC
Mr. K. N. Jabour, Licensing Project Manager - Hatch

U. S. Nuclear Regulatory Commission, Region II
Mr. S. D. Ebner, Regional Administrator
Mr. L. D. Wert, Senior Resident Inspector - Hatch

State of Georgia

Mr. J. D. Tanner, Commissioner - Department of Natural Resources

ENCLOSURE 1

EDWIN I. HATCH NUCLEAR PLANT - UNITS 1,2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
REVISIONS TO SNUBBER VISUAL INSPECTION INTERVALS
IN ACCORDANCE WITH GENERIC LETTER 90-09

BASIS FOR CHANGE REQUEST

PROPOSED CHANGE:

The proposed change will revise the Hatch Unit 1 Technical Specifications Section 4.6.L and the Hatch Unit 2 Technical Specifications Section 4.7.4 concerning snubber surveillance to reflect the present guidance proposed in Enclosure B of Generic Letter 90-09, "Alternate Requirements for Snubber Visual Inspection Intervals and Corrective Actions."

BASIS FOR PROPOSED CHANGE:

The wording of Unit 1 Section 4.6.L and Unit 2 Section 4.7.4 currently specifies a schedule for snubber visual inspection based on the number of inoperable snubbers found during the previous visual inspection. The schedules for visual inspections assume that refueling intervals will not exceed 18 months. Because the current schedule for snubber visual inspections is based only on the number of inoperable snubbers found during the previous visual inspection, irrespective of the size of the snubber population, licensees having a large number of snubbers find that the visual inspection schedule is excessively restrictive. Some licensees have spent a significant amount of resources and have subjected plant personnel to unnecessary radiological exposure to comply with the visual examination requirements.

To alleviate this situation, the NRC staff developed an alternate schedule for visual inspections that maintains the same confidence level as the existing schedule and generally allows the licensee to perform visual inspections and corrective actions during plant outages. This technical specification revision will reduce future occupational radiation exposure and is highly cost effective. This alternate inspection schedule as identified in Attachment B of Generic Letter 90-09 is consistent with the Commission's Policy Statement on Technical Specification Improvements. Revisions to the wording of the Generic Letter 90-09 proposed technical specifications were made to maintain consistency with the current Hatch technical specification definition of snubber categorization and disposition of visual failures.

REFERENCE:

Generic Letter 90-09, NRC Letter to All Light-Water Reactor Licensees and Applicants, "Alternate Requirements for Snubber Visual Inspection Intervals and Corrective Actions," December 11, 1990.

ENCLOSURE 2

EDWIN I. HATCH NUCLEAR PLANT - UNITS 1,2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
REVISIONS TO SNUBBER VISUAL INSPECTION INTERVALS
IN ACCORDANCE WITH GENERIC LETTER 90-09

10 CFR 50.92 EVALUATION

PROPOSED CHANGE:

As discussed in Enclosure 1, this proposed change will revise the Hatch Unit 1 Technical Specifications Section 4.6.L and the Hatch Unit 2 Technical Specifications Section 4.7.4 concerning snubber surveillance to reflect the present guidance proposed in Enclosure B of Generic Letter 90-09, "Alternate Requirements for Snubber Visual Inspection Intervals and Corrective Actions."

BASIS FOR PROPOSED CHANGE:

Georgia Power Company has reviewed the requirements of 10 CFR 50.92 as they relate to the incorporation of the alternate inspection schedule for snubber visual inspection intervals and considers these changes not to involve a significant hazards consideration. In support of this conclusion, the following analysis is provided:

- (1) The proposed changes will not involve a significant increase in the probability or consequences of an accident previously evaluated. No physical change to the facility or its operating parameters is being made. The proposed changes were developed by the NRC Staff and maintain the same confidence level as the existing visual snubber inspection schedule as specified within Generic Letter 90-09. For these reasons, the response of the plant to previously evaluated accidents will remain unchanged.
- (2) The proposed changes will not create the possibility of a new or different kind of accident from any accident previously evaluated. Since no change is being made to degrade the design, operation, or maintenance of the plant, a new mode of failure is not created. Therefore, a new or different kind of accident will not occur as a result of these changes.
- (3) The proposed changes do not involve a significant reduction in a margin of safety. The Surveillance Requirements set forth in Generic Letter 90-09 as alternate requirements for snubber visual inspection intervals were developed by the NRC Staff and, as addressed in Generic Letter 90-09, maintain the same confidence level as the present requirements. Therefore, incorporating the suggested Surveillance Requirements from Generic Letter 90-09 will not reduce any margin of safety.