

September 22, 1999

Mr. H. B. Barron
Vice President, McGuire Site
Duke Energy Corporation
12700 Hagers Ferry Road
Huntersville, NC 28078-8985

SUBJECT: MCGUIRE NUCLEAR STATION, UNITS 1 AND 2 - RE: ISSUANCE OF AMENDMENTS (TAC NOS. MA6428 AND MA6429)

Dear Mr. Barron:

The Nuclear Regulatory Commission has issued the enclosed Amendment No. 187 to Facility Operating License NPF-9 and Amendment No. 168 to Facility Operating License NPF-17 for the McGuire Nuclear Station, Units 1 and 2. The amendments consist of changes to the Technical Specifications (TSs) in response to your application dated September 13, 1999.

The amendments revise Technical Specifications (TS) 3.7.9, "Control Room Area Ventilation System (CRAVS)," to establish actions to be taken for an inoperable control room ventilation system due to a degraded control room pressure boundary. This revision approves changes that would allow up to 24 hours to restore the Control Room Pressure Boundary (CRPB) to operable status when two CRAVS trains are inoperable due to an inoperable CRPB in MODES 1, 2, 3, and 4. In addition, a Limiting Condition for Operation note would be added to allow the CRPB to be opened intermittently under administrative control without affecting CRAVS operability. The applicable TS Bases have been revised to document the TS changes and to provide supporting information.

A copy of the related Safety Evaluation is also enclosed. A Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,
Original signed by:
Frank Rinaldi, Project Manager, Section 1
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

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P PDR

Docket Nos. 50-369 and 50-370

Enclosures:

1. Amendment No. 187 to NPF-9
2. Amendment No. 168 to NPF-17
3. Safety Evaluation

cc w/encl: See next page 290025

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

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12700 Hagers Ferry Road
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A copy of the related Safety Evaluation is also enclosed. A Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank Rinaldi".

Frank Rinaldi, Project Manager, Section 1
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-369 and 50-370

Enclosures:

1. Amendment No. 187 to NPF-9
2. Amendment No. 168 to NPF-17
3. Safety Evaluation

cc w/encl: See next page

McGuire Nuclear Station

cc:

Ms. Lisa F. Vaughn
Legal Department (PBO5E)
Duke Energy Corporation
422 South Church Street
Charlotte, North Carolina 28201-1006

County Manager of
Mecklenburg County
720 East Fourth Street
Charlotte, North Carolina 28202

Michael T. Cash
Regulatory Compliance Manager
Duke Energy Corporation
McGuire Nuclear Site
12700 Hagers Ferry Road
Huntersville, North Carolina 28078

J. Michael McGarry, III, Esquire
Winston and Strawn
1400 L Street, NW.
Washington, DC 20005

Senior Resident Inspector
c/o U.S. Nuclear Regulatory Commission
12700 Hagers Ferry Road
Huntersville, North Carolina 28078

Dr. John M. Barry
Mecklenberg County
Department of Environmental
Protection
700 N. Tryon Street
Charlotte, North Carolina 28202

Mr. Steven P. Shaver
Senior Sales Engineer
Westinshouse Electric Company
5929 Carnegie Blvd.
Suite 500
Charlotte, North Carolina 28209

Ms. Karen E. Long
Assistant Attorney General
North Carolina Department of
Justice
P. O. Box 629
Raleigh, North Carolina 27602

L. A. Keller
Manager - Nuclear Regulatory
Licensing
Duke Energy Corporation
526 South Church Street
Charlotte, North Carolina 28201-1006

Elaine Wathen, Lead REP Planner
Division of Emergency Management
116 West Jones Street
Raleigh, North Carolina 27603-1335

Mr. Richard M. Fry, Director
Division of Radiation Protection
North Carolina Department of
Environment, Health and Natural
Resources
3825 Barrett Drive
Raleigh, North Carolina 27609-7721

Mr. T. Richard Puryear
Owners Group (NCEMC)
Duke Energy Corporation
4800 Concord Road
York, South Carolina 29745



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

DUKE ENERGY CORPORATION

DOCKET NO. 50-369

MCGUIRE NUCLEAR STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 187
License No. NPF-9

1. The Nuclear Regulatory Commission (the Commission) has found that:

- A. The application for amendment to the McGuire Nuclear Station, Unit 1 (the facility), Facility Operating License No. NPF-9 filed by the Duke Energy Corporation (licensee) dated September 13, 1999, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations as set forth in 10 CFR Chapter I;
- B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
- C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
- D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
- E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

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2. Accordingly, the license is hereby amended by page changes to the Technical Specifications as indicated in the attachment to this license amendment, and Paragraph 2.C.(2) of Facility Operating License No. NPF-9 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 187 , are hereby incorporated into this license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and is to be implemented upon receipt.

FOR THE NUCLEAR REGULATORY COMMISSION



Richard L. Emch, Jr., Chief, Section 1
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment:
Technical Specification
Changes

Date of Issuance: September 22, 1999



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

DUKE ENERGY CORPORATION

DOCKET NO. 50-370

MCGUIRE NUCLEAR STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 168
License No. NPF-17

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment to the McGuire Nuclear Station, Unit 2 (the facility), Facility Operating License No. NPF-17 filed by the Duke Energy Corporation (licensee) dated September 13, 1999, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations as set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is hereby amended by page changes to the Technical Specifications as indicated in the attachment to this license amendment, and Paragraph 2.C.(2) of Facility Operating License No. NPF-17 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 168 , are hereby incorporated into this license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and is to be implemented upon receipt.

FOR THE NUCLEAR REGULATORY COMMISSION



Richard L. Emch, Jr., Chief, Section 1
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment:
Technical Specification
Changes

Date of Issuance: September 22, 1999

ATTACHMENT TO LICENSE AMENDMENT NO. 187

FACILITY OPERATING LICENSE NO. NPF-9

AND

ATTACHMENT TO LICENSE AMENDMENT NO. 168

FACILITY OPERATING LICENSE NO. NPF-17

DOCKET NOS. 50-369 AND 50-370

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contains vertical lines indicating the areas of change.

Remove

Insert

3.7.9-1

3.7.9-1

3.7.9-2

3.7.9-2

B 3.7.9-3

B 3.7.9-3

B 3.7.9-4

B 3.7.9-4

B 3.7.9-5

B 3.7.9-5

B 3.7.9-6

B 3.7.9-7

3.7 PLANT SYSTEMS

3.7.9 Control Room Area Ventilation System (CRAVS)

LCO 3.7.9 Two CRAVS trains shall be OPERABLE.

-----NOTE-----
The control room boundary may be opened intermittently under administrative control.

APPLICABILITY: MODES 1, 2, 3, 4, 5, and 6,
During movement of irradiated fuel assemblies,
During CORE ALTERATIONS.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One CRAVS train inoperable.	A.1 Restore CRAVS train to OPERABLE status.	7 days
B. Required Action and associated Completion Time of Condition A not met in MODE 1, 2, 3, or 4.	B.1 Be in MODE 3. <u>AND</u> B.2 Be in MODE 5.	6 hours 36 hours
C. Required Action and associated Completion Time of Condition A not met in MODE 5 or 6, or during movement of irradiated fuel assemblies, or during CORE ALTERATIONS.	C.1 Place OPERABLE CRAVS train in emergency mode. <u>OR</u>	Immediately

(continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. (continued)	C.2.1 Suspend CORE ALTERATIONS. <u>AND</u> C.2.2 Suspend movement of irradiated fuel assemblies.	Immediately Immediately
D. Two CRAVS trains inoperable in MODE 5 or 6, or during movement of irradiated fuel assemblies, or during CORE ALTERATIONS.	D.1 Suspend CORE ALTERATIONS. <u>AND</u> D.2 Suspend movement of irradiated fuel assemblies.	Immediately Immediately
E. Two CRAVS trains inoperable in MODE 1, 2, 3, or 4 (for reasons other than Condition G).	E.1 Enter LCO 3.0.3.	Immediately
F. One or more CRAVS train(s) heater inoperable.	F.1 Restore CRAVS train(s) heater to OPERABLE status. <u>OR</u> F.2 Initiate action in accordance with Specification 5.6.6.	7 days 7 days
G. Two CRAVS trains inoperable due to inoperable control room boundary in MODE 1, 2, 3, or 4.	G.1 Restore control room boundary to OPERABLE status.	24 hours

BASES

LCO (continued)

- a. An Outside Air Pressure Filter Train fan and a Control Room Air Handling unit are OPERABLE;
- b. HEPA filters and charcoal adsorbers are not excessively restricting flow, and are capable of performing their filtration functions; and
- c. Ductwork, valves, and dampers are OPERABLE, and air circulation can be maintained.

In addition, the control room boundary must be maintained, including the integrity of the walls, floors, ceilings, ductwork, and access doors.

The CRAVS is shared between the two units. The system must be OPERABLE for each unit when that unit is in the MODE of Applicability. Additionally, both normal and emergency power must also be OPERABLE because the system is shared. If a CRAVS component becomes inoperable, or normal or emergency power to a CRAVS component becomes inoperable, then the Required Actions of this LCO must be entered independently for each unit that is in the MODE of applicability of the LCO.

The LCO is modified by a Note allowing the control room boundary to be opened intermittently under administrative controls. For entry and exit through doors, the administrative control of the opening is performed by the person(s) entering or exiting the area. For other openings, these controls consist of stationing a dedicated individual at the opening who is in continuous communication with the control room. This individual will have a method to rapidly close the opening when a need for control room area isolation is indicated.

APPLICABILITY

In MODES 1, 2, 3, 4, 5, and 6, and during movement of irradiated fuel assemblies and during CORE ALTERATIONS, CRAVS must be OPERABLE to control operator exposure during and following a DBA.

During movement of irradiated fuel assemblies and CORE ALTERATIONS, the CRAVS must be OPERABLE to cope with the release from a fuel handling accident.

ACTIONS

A.1

When one CRAVS train is inoperable, action must be taken to restore OPERABLE status within 7 days. In this Condition, the remaining OPERABLE CRAVS train is adequate to perform the control room protection function. However, the overall reliability is reduced because a single failure in the OPERABLE CRAVS train could result in loss of CRAVS function. The 7 day Completion Time is based on the low probability of a DBA occurring during this time period, and ability of the remaining train to provide the required capability.

B.1 and B.2

In MODE 1, 2, 3, or 4, if the inoperable CRAVS train cannot be restored to OPERABLE status within the required Completion Time, the unit must be placed in a MODE that minimizes accident risk. To achieve this status, the unit must be placed in at least MODE 3 within 6 hours, and in MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

C.1, C.2.1, and C.2.2

In MODE 5 or 6, or during movement of irradiated fuel assemblies, or during CORE ALTERATIONS, if the inoperable CRAVS train cannot be restored to OPERABLE status within the required Completion Time, action must be taken to immediately place the OPERABLE CRAVS train in the emergency mode. This action ensures that the remaining train is OPERABLE, that no failures preventing automatic actuation will occur, and that any active failure would be readily detected. An alternative to Required Action C.1 is to immediately suspend activities that could result in a release of radioactivity that might require isolation of the control room. This places the unit in a condition that minimizes risk. This does not preclude the movement of fuel to a safe position.

D.1 and D.2

In MODE 5 or 6, or during movement of irradiated fuel assemblies, or during CORE ALTERATIONS, with two CRAVS trains inoperable, action must be taken immediately to suspend activities that could result in a release of radioactivity that might enter the control room. This places the

ACTIONS (continued)

unit in a condition that minimizes accident risk. This does not preclude the movement of fuel to a safe position.

E.1

If both CRAVS trains are inoperable in MODE 1, 2, 3, or 4 for reasons other than Condition G, the CRAVS may not be capable of performing the intended function and the unit is in a condition outside the accident analyses. Therefore, LCO 3.0.3 must be entered immediately.

F.1 and F.2

Action F.1 allows one or more CRAVS heater inoperable, with the heater restored to OPERABLE status within 7 days. Alternatively, Action F.2 requires if the heater is not returned to OPERABLE within the 7 days, a report to be initiated per Specification 5.6.6, which details the reason for the heater's inoperability and the corrective action required to return the heater to OPERABLE status.

The heaters do not affect OPERABILITY of the CRAVS filter train because charcoal absorber efficiency testing is performed at 30°C and 90 % relative humidity. The accident analysis shows that site boundary radiation doses are within 10 CFR 100 limits during a DBA LOCA under these conditions.

G.1

If the control room boundary is inoperable in MODES 1, 2, 3, or 4 such that the CRAVS trains can not establish or maintain the required pressure, action must be taken to restore an OPERABLE control room boundary within 24 hours. The 24 hour Completion Time is reasonable based on the low probability of a DBA occurring during this time period, the availability of the CRAVS to provide a filtered environment (albeit with potential control room inleakage), and compensatory measures consistent with the intent of GDC 19 that are available to the operator to minimize doses (e.g. self contained breathing apparatus and alternate control room air intakes). These measures should be available for intentional and unintentional entry into the condition.

SURVEILLANCE
REQUIREMENTSSR 3.7.9.1

Standby systems should be checked periodically to ensure that they function properly. As the environment and normal operating conditions on this system are not too severe, testing each train once every month provides an adequate check of this system. Monthly heater operations dry out any moisture accumulated in the charcoal from humidity in the ambient air. Systems with heaters must be operated from the control room for ≥ 10 continuous hours with the heaters energized and flow through the HEPA filters and charcoal adsorbers. The 31 day Frequency is based on the reliability of the equipment and the two train redundancy availability.

SR 3.7.9.2

This SR verifies that the required CRAVS testing is performed in accordance with the Ventilation Filter Testing Program (VFTP). The CRAVS filter tests are in accordance with Regulatory Guide 1.52 (Ref. 4). The VFTP includes testing the performance of the HEPA filter, charcoal adsorber efficiency, minimum flow rate, and the physical properties of the activated charcoal. Specific test Frequencies and additional information are discussed in detail in the VFTP.

SR 3.7.9.3

This SR verifies that each CRAVS train starts and operates with flow through the HEPA filters and charcoal adsorbers on an actual or simulated actuation signal. The Frequency of 18 months is specified in Regulatory Guide 1.52 (Ref. 4).

SR 3.7.9.4

This SR verifies the integrity of the control room enclosure, and the assumed inleakage rates of the potentially contaminated air. The control room positive pressure, with respect to potentially contaminated adjacent areas, is periodically tested to verify proper functioning of the CRAVS. During the emergency mode of operation, the CRAVS is designed to pressurize the control room ≥ 0.125 inches water gauge positive pressure with respect to atmospheric pressure in order to prevent unfiltered inleakage. The CRAVS is designed to maintain this positive pressure with one train at a makeup flow rate of ≤ 2200 cfm. The Frequency of 18 months on a STAGGERED TEST BASIS is consistent with the guidance provided in NUREG-0800 (Ref. 5).

BASES

REFERENCES

1. UFSAR, Section 6.4.
2. UFSAR, Chapter 15.
3. 10 CFR 50.37, Technical Specifications, (c)(2)(ii).
4. Regulatory Guide 1.52, Rev. 2.
5. NUREG-0800, Section 6.4, Rev. 2, July 1981.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 187 TO FACILITY OPERATING LICENSE NPF-9
AND AMENDMENT NO. 168 TO FACILITY OPERATING LICENSE NPF-17

DUKE ENERGY CORPORATION

MCGUIRE NUCLEAR STATION, UNITS 1 AND 2

DOCKET NOS. 50-369 AND 50-370

1.0 INTRODUCTION

By letter dated September 13, 1999, Duke Energy Corporation, (DEC/licensee), submitted a request for changes to the McGuire Nuclear Station, Units 1 and 2, Technical Specifications (TS). The requested changes would revise TS 3.7.9, "Control Room Area Ventilation System (CRAVS)," to establish actions to be taken for an inoperable control room ventilation system due to a degraded control room pressure boundary (CRPB). This revision approves changes that would allow up to 24 hours to restore the CRPB to operable status when two CRAVS trains are inoperable due to an inoperable CRPB in MODES 1, 2, 3, and 4. In addition, a Limiting Condition for Operation (LCO) note would be added to allow the CRPB to be opened intermittently under administrative control without affecting CRAVS operability. The applicable TS Bases have been revised to document the TS changes and to provide supporting information.

2.0 BACKGROUND

The existing LCO 3.7.9 surveillance requirements that test the integrity of the control room boundary require a positive pressure limit to be satisfied with one ventilation train operating. While other surveillance requirements in the same specification test the operability and function of the ventilation train, the pressure test ensures that the control room pressure boundary leak tightness is adequate to meet design assumptions for post-accident operator doses.

Currently, there are no corresponding conditions, required actions, or completion times specified in LCO 3.7.9 should the control room pressure boundary surveillance not be met. Under the existing specifications, LCO 3.0.3 must be entered (for two-train inoperability). Requiring the plant to enter LCO 3.0.3 when the ventilation boundary is not intact does not provide time to effect required repairs or corrective maintenance activities.

The proposed change is similar in nature to LCO 3.6.16 for the Reactor Building. LCO 3.6.16 allows 24 hours to restore the reactor building envelope to operable status before requiring an orderly shutdown from operating conditions.

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3.0 EVALUATION

The proposed changes are:

1. A note has been added to LCO 3.7.9 for the CRAVS to allow the control room boundary to be opened intermittently under administrative control. Corresponding Bases have been added which establish the administrative controls that are required to minimize the consequences of the open boundary.
2. Condition G is added to LCO 3.7.9 to specify that 24 hours are allowed to restore an inoperable control room boundary to operable status. Corresponding Bases are added to support this change.
3. Condition E of LCO 3.7.9 for two inoperable CRAVS trains in Modes 1-4 is modified to exclude entry into this condition when the trains are inoperable because of the degraded control room pressure boundary. The associated Bases for Condition E are revised accordingly.

The LCO is modified by a Note allowing the control room boundary to be opened intermittently under administrative controls. For entry and exit through doors, the administrative control of the opening is performed by the person(s) entering or exiting the area. For other openings, these controls consist of stationing a dedicated individual at the opening who is in continuous communication with the control room. This individual will have a method to rapidly close the opening when a need for control room area isolation is indicated.

If the control room boundary is inoperable in MODES 1, 2, 3, or 4 such that the CRAVS trains cannot establish or maintain the required pressure, action must be taken to restore an OPERABLE control room boundary within 24 hours. The 24-hour completion time is reasonable based on the low probability of a design basis accident occurring during this time period and compensatory measures available to the operator to minimize doses.

The proposed changes would allow 24 hours (during Modes 1, 2, 3, or 4) to restore the capability to maintain control room boundary pressure before requiring the unit to perform an orderly shutdown and also allows intermittent opening of the control room boundary under administrative control. The administrative controls establish appropriate compensatory measures to minimize the consequences of an event during this time. For example, when the control room boundary is opened for other than entry through doors, the proposed Bases require that a dedicated individual be stationed in the area in continuous contact with the control room to rapidly restore the boundary.

Additionally, the proposed change is considered acceptable because of the low probability of an event requiring an intact control room boundary occurring during the 24-hour action completion time associated with Condition "G".

Based on the low probability of an event occurring in this time and the availability of compensatory measures to minimize the consequences during an event, the proposed change is considered acceptable.

4.0 STATEMENT OF EXIGENT CIRCUMSTANCES

The Commission's regulation, as stated in Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.91, provides special exceptions for the issuance of amendments when the usual 30-day public notice cannot be met. One type of special exception is an exigency. An exigency exists when the staff and the licensee need to act quickly and time does not permit the staff to publish a *Federal Register* notice allowing 30 days for prior public comment, and the staff also determines that the amendment involves no significant hazards consideration. In accordance with 10 CFR 50.91(a)(6)(i)(B), the staff used local media to provide reasonable notice to the public in the area surrounding the McGuire Nuclear Station, of the proposed amendment and proposed finding of no significant hazards consideration, and reasonable opportunity to comment thereon. The notice was published in *Charlotte Observer*, North Carolina, September 17, 1999, and requested any comments be submitted by 4:15 p.m. on September 17, 1999, by telephone, facsimile, e-mail, or mail. No comments were received.

The licensee's September 13, 1999, submittal indicated that TS Surveillance Requirement (TSSR) 3.7.9.2 requires the filters and activated charcoal absorbent in each CRAVS train Control Room pressurization flow path to be periodically tested in accordance with the McGuire Ventilation Filter Testing Program (VFTP) as described in TS 5.5.11. As part of this testing, the CRAVS train being tested is declared inoperable while the other train remains operable to pressurize the Control Room if needed. Since the potential exists for backflow through this breach from the operable CRAVS train, the licensee's past practice was to ensure the operability of the non-tested CRAVS train by stationing dedicated plant personnel at the breach in the tested train with instructions to re-install the hatch cover upon notification of an event by Control Room personnel.

The next performance of TSSR 3.7.9.2 on CRAVS Train "B" was originally scheduled for June 1999. However, the staff questioned the licensee's past practices to maintain the operability of the non-tested CRAVS train. Also, NRC and industry groups were proposing generic changes to the standardized TS, described as "TSTF-287," that would allow intermittent breaching of the CRPB under administrative controls. Indications were that TSTF-287 would be approved prior to September 25, 1999, the late date for performance of TSSR 3.7.9.2 on CRAVS Train "B" after incorporating the 25 percent extension of the surveillance frequency allowed by TSSR 3.0.2. The licensee was planning to submit changes to TS 3.7.9, based upon TSTF-287 and perform the surveillance on CRAVS Train "B" prior to September 25, 1999.

However, since approval of TSTF-287 was being delayed, the licensee evaluated alternative means of performing the required surveillance testing of CRAVS Train "B". These evaluations concluded that the best alternative for maintaining operability of CRAVS Train "A" during testing of Train "B" was to isolate Train "B" by closing and gagging its dampers. At that time, the licensee anticipated that isolation of CRAVS Train "B" using that train's dampers would allow successful completion of TSSR 3.7.9.2 on CRAVS Train "B" prior to September 25, 1999. However, on September 9, 1999, the licensee determined that complete isolation of CRAVS Train "B" using that train's dampers could not be guaranteed given the lack of any required leak testing of those dampers.

Upon identifying the operability concerns, the licensee notified the NRC of the need for a change to TS 3.7.9. However, given the September 25, 1999, late date for performance of

TSSR 3.7.9.2 on CRAVS Train "B", less than 30 days exists to allow for the normal comment period under 10 CFR 50.91. Absent the performance of the surveillance or an amendment, Unit 2 would be forced to shut down under the requirements of TS 3.0.3 and, since it will be in a scheduled refueling outage, Unit 1 would be required to suspend core alterations or movement of irradiated fuel assemblies under the requirements of TS 3.7.9. In addition, the proposed amendments involve no significant hazards as specified under 10 CFR 50.92.

On the basis of the above discussion, the staff has determined that exigent circumstances exist and that the licensee used its best efforts to make a timely application and did not cause the exigent situation.

5.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

In accordance with the criteria set forth in 10 CFR 50.91 and 50.92, McGuire Nuclear Station has evaluated this proposed Technical Specification change and determined it does not represent a significant hazards consideration. The following is provided by the licensee in support of this conclusion.

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

No. The Control Room Area Ventilation System and Control Room boundary are not assumed to be an initiator of any analyzed accident; they are provided to minimize doses to the control room operators during an accident. Therefore, these proposed changes have no impact on the probability of occurrence of any previously analyzed accident.

The proposed changes also have no impact on offsite dose consequences. The control room ventilation system and control room boundary provide protection for control room personnel only and do not mitigate radiological effluents released offsite. With the control room boundary inoperable and not pressurized, the accident analyses assume unfiltered air would enter the control room and operator doses would be significantly increased. Conservative accident analysis assumptions do not take credit for available compensatory measures to mitigate operator dose. These include the use of the alternate control room intake to select the intake with the lowest radioactivity level, filtration of outside air by an operable CRAVS train, and the availability of self-contained breathing apparatus.

Additionally, for cases where the control room boundary is opened under administrative control, compensatory measures would be required by the proposed TS to ensure the boundary can be rapidly restored. Based on the compensatory measures available to the control room operator to minimize dose, the compensatory measures required to rapidly restore an opened boundary, and considering the low probability of an event occurring in this short time period, the consequences are not considered to be significantly increased. Operators maintain the ability to mitigate a design basis event.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

No. No changes are being made to actual plant hardware which will result in any new accident causal mechanisms. Also, no changes are being made to the way in which the plant is being operated. Therefore, no new accident causal mechanisms will be generated.

3. Does this change involve a significant reduction in a margin of safety?

No. Margin of safety is related to the ability of the fission product barriers to perform their design functions during and following accident conditions. These barriers include the fuel cladding, the reactor coolant system, and the containment system. The performance of these barriers will not be degraded by the proposed changes. The Control Room Ventilation System and control room boundary provide a protected environment for the control room operators during analyzed events. The proposed change would allow the boundary to be degraded for a limited period of time. However, compensatory measures would be in place to rapidly restore an opened boundary and to utilize existing measures (breathing apparatus) to minimize operator dose. Therefore, it is expected that operators would maintain the ability to mitigate design basis events and none of the fission product barriers would be affected by this change. Therefore, the proposed change is not considered to result in a significant reduction in a margin of safety.

The NRC staff has reviewed the licensee's analysis, and based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff determines that the amendment request involves no significant hazards consideration.

6.0 STATE CONSULTATION

In accordance with the Commission's regulations, the North Carolina State official was notified of the proposed issuance of the amendments. The State official had no comments.

7.0 ENVIRONMENTAL CONSIDERATION

The amendments change requirements with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change surveillance requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments. The Commission has made a final no significant hazards finding with respect to this amendment.

8.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the

Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: H. Walker
F. Rinaldi

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