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A Duke Energy Company

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August 18, 2004

U. S. Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, D.C. 20555

Subject: Duke Energy Corporation
McGuire Nuclear Station, Units 1 and 2
Docket Nos. 50-369 and 50-370

License Amendment Request for Technical Specification 3.3.2, Engineered Safety Features Actuation System Instrumentation

Pursuant to 10 CFR 50.4 and 10 CFR 50.90, Duke Energy Corporation (Duke) is requesting a License Amendment Request (LAR) to the McGuire Nuclear Station Facility Operating Licenses and Technical Specifications (TS). As described below, this LAR will correct an inadvertent TS change omission made by Duke during the submittal of LARs associated with TS Amendment 182/164 and Amendment 184/166.

Duke LAR dated October 6, 1997, as supplemented by letter dated August 24, 1998 (the first LAR), included two versions of TSs, one for former TS 3/4.3.2, and one for Standardized TS (STS) 3.3.2. The first LAR was for deleting all references to the Safety Injection Steam Line Pressure-Low function. This function was deleted due to redundant Safety Injection signals being available during design basis accidents. In the first LAR, all concerned references were correctly deleted from former TS 3/4.3.2 but were not correctly deleted from STS 3.3.2. Specifically, the concerned reference was not deleted from Footnote (c) to STS Table 3.3.2-1 and from the Bases of STS 3.3.2 Function 4.d.(1). The NRC approved the changes to former TS 3/4.3.2 in the first LAR by TS Amendment 182/164 dated September 22, 1998.

Duke LAR dated May 27, 1997, as supplemented by letters dated March 9, March 20, April 20, June 3, June 24, July 7, July 21, August 5, September 8 and September 15, 1998 (the second LAR), proposed full conversion from former TSs to STSs. The changes to STS 3.3.2, as proposed in the first LAR, were similarly proposed in the second LAR. The NRC approved the second LAR by TS Amendment 184/166 dated September 30, 1998. As a result of the omission in the

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first LAR for STS 3.3.2, TS Amendment 184/166 contained the same omission for STS 3.3.2.

Attachment 1 provides a marked copy of the affected TS and TS Bases showing the proposed changes. These changes were inadvertently omitted in the previously mentioned LARs.

Attachment 2 provides reprinted pages of the affected TS and TS Bases with the proposed changes incorporated.

Attachment 3 provides a description of the proposed changes and justifications.

Attachment 4, pursuant to 10 CFR 50.92, provides the determination that this LAR contains No Significant Hazards Consideration.

Attachment 5, pursuant to 10 CFR 51.22, provides the basis for the categorical exclusion from performing an Environmental Assessment/Impact Statement.

Implementation of this LAR will not impact the McGuire Updated Final Safety Analysis Report (UFSAR).

Duke is requesting NRC review and approval of this LAR at its earliest convenience so that the identified TS and TS Bases may be corrected.

In accordance with Duke administrative procedures and the Quality Assurance Program Topical Report, this LAR has been reviewed and approved by the McGuire Plant Operations Review Committee Chairman and the Duke Corporate Nuclear Safety Review Board Director.

Pursuant to 10 CFR 50.91, a copy of this LAR is being forwarded to the appropriate North Carolina State officials.

Inquiries on this matter should be directed to P. T. Vu at 704-875-4302.

Sincerely,

G. R. Peterson

Attachments

xc: w/attachments

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OATH AND AFFIRMATION

G. R. Peterson affirms that he is the person who subscribed his name to the foregoing statement, and that all the matters and facts set forth herein are true and correct to the best of his knowledge.

G. R. Peterson, Site Vice President

Subscribed and sworn to me: August 18, 2004
Date

Freda K. Crump
Notary Public

My commission expires: August 17, 2006
Date

ATTACHMENT 1

MARKED PAGES OF AFFECTED TECHNICAL SPECIFICATION AND BASES

For info. only.

Table 3.3.2-1 (page 1 of 5)
Engineered Safety Feature Actuation System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	NOMINAL TRIP SETPOINT
1. Safety Injection						
a. Manual Initiation	1,2,3,4	2	B	SR 3.3.2.7	NA	NA
b. Automatic Actuation Logic and Actuation Relays	1,2,3,4	2 trains	C	SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.6	NA	NA
c. Containment Pressure - High	1,2,3	3	D	SR 3.3.2.1 SR 3.3.2.5 SR 3.3.2.8 SR 3.3.2.9	$\leq$ 1.2 psig	1.1 psig
d. Pressurizer Pressure - Low Low	1,2,3(a)	4	D	SR 3.3.2.1 SR 3.3.2.5 SR 3.3.2.8 SR 3.3.2.9	$\geq$ 1835 psig	1845 psig
2. Containment Spray						
a. Manual Initiation	1,2,3,4	1 per train, 2 trains	B	SR 3.3.2.7	NA	NA
b. Automatic Actuation Logic and Actuation Relays	1,2,3,4	2 trains	C	SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.6	NA	NA
c. Containment Pressure - High High	1,2,3	4	E	SR 3.3.2.1 SR 3.3.2.5 SR 3.3.2.8 SR 3.3.2.9	$\leq$ 3.0 psig	2.9 psig
3. Containment Isolation						
a. Phase A Isolation						
(1) Manual Initiation	1,2,3,4	2	B	SR 3.3.2.7	NA	NA
(2) Automatic Actuation Logic and Actuation Relays	1,2,3,4	2 trains	C	SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.6	NA	NA

(continued)

(a) Above the P-11 (Pressurizer Pressure) interlock.

Table 3.3.2-1 (page 2 of 5)
Engineered Safety Feature Actuation System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	NOMINAL TRIP SETPOINT
3. Containment Isolation (continued)						
(3) Safety Injection	Refer to Function 1 (Safety Injection) for all initiation functions and requirements.					
b. Phase B Isolation						
(1) Manual Initiation	1,2,3,4	1 per train, 2 trains	B	SR 3.3.2.7	NA	NA
(2) Automatic Actuation Logic and Actuation Relays	1,2,3,4	2 trains	C	SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.6	NA	NA
(3) Containment Pressure - High High	1,2,3	4	E	SR 3.3.2.1 SR 3.3.2.5 SR 3.3.2.8	$\leq$ 3.0 psig	2.9 psig
4. Steam Line Isolation						
a. Manual Initiation						
(1) System	1,2(b),3(b)	2 trains	F	SR 3.3.2.7	NA	NA
(2) Individual	1,2(b),3(b)	1 per line	G	SR 3.3.2.7	NA	NA
b. Automatic Actuation Logic and Actuation Relays	1,2(b),3(b)	2 trains	H	SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.6	NA	NA
c. Containment Pressure - High High	1,2(b), 3(b)	4	E	SR 3.3.2.1 SR 3.3.2.5 SR 3.3.2.8 SR 3.3.2.9	$\leq$ 3.0 psig	2.9 psig
d. Steam Line Pressure						
(1) Low	1,2(b), 3(a)(b)	3 per steam line	D	SR 3.3.2.1 SR 3.3.2.5 SR 3.3.2.8 SR 3.3.2.9	$\geq$ 755 psig	775 psig

(continued)

(a) Above the P-11 (Pressurizer Pressure) interlock.
(b) Except when all MSIVs are closed and de-activated.

Table 3.3.2-1 (page 3 of 5)
Engineered Safety Feature Actuation System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	NOMINAL TRIP SETPOINT
4. Steam Line Isolation (continued)						
(2) Negative Rate - High	3[b][c]	3 per steam line	D	SR 3.3.2.1 SR 3.3.2.5 SR 3.3.2.8 SR 3.3.2.9	≤ 120[d] psi	100[d] psi
5. Turbine Trip and Feedwater Isolation						
a. Turbine Trip						
(1) Automatic Actuation Logic and Actuation Relays	1,2	2 trains	I	SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.6	NA	NA
(2) SG Water Level-High High (P-14)	1,2	3 per SG	J	SR 3.3.2.1 SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.5 SR 3.3.2.6 SR 3.3.2.8 SR 3.3.2.9	≤ 85.6%	83.9%
(3) Safety Injection	Refer to Function 1 (Safety Injection) for all initiation functions and requirements. See item 5.a.(1) for Applicable MODES.					
b. Feedwater Isolation						
(1) Automatic Actuation Logic and Actuation Relays	1,2[e], 3[e]	2 trains	H	SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.6	NA	NA
(2) SG Water Level-High High (P-14)	1,2[e], 3[e]	3 per SG	D	SR 3.3.2.1 SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.5 SR 3.3.2.6 SR 3.3.2.8 SR 3.3.2.9	≤ 85.6	83.9%

(continued)

(b) Except when all MSIVs are closed and de-activated.
(c) Trip function automatically blocked above P-11 (Pressurizer Pressure) interlock and may be blocked below P-11 when Safety Injection Steam Line Pressure-Low is not blocked.
(d) Time constant utilized in the rate/lag controller is ≥ 50 seconds.
(e) Except when all MFIVs, MFCVs, and associated bypass valves are closed and de-activated or isolated by a closed manual valve.

Steam Line Isolation

For info. only.

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

Phase B containment isolation. There also is adequate time for the operator to evaluate unit conditions and manually actuate individual isolation valves in response to abnormal or accident conditions.

(3) Phase B Isolation-Containment Pressure - High High

The basis for containment pressure MODE applicability is as discussed for ESFAS Function 2.c above.

4. Steam Line Isolation

Isolation of the main steam lines provides protection in the event of an SLB inside or outside containment. Rapid isolation of the steam lines will limit the steam break accident to the blowdown from one SG, at most. For an SLB upstream of the main steam isolation valves (MSIVs), inside or outside of containment, closure of the MSIVs limits the accident to the blowdown from only the affected SG. For an SLB downstream of the MSIVs, closure of the MSIVs terminates the accident as soon as the steam lines depressurize. Steam Line Isolation also mitigates the effects of a feed line break and ensures a source of steam for the turbine driven AFW pump during a feed line break.

a. Steam Line Isolation-Manual Initiation

Manual initiation of Steam Line Isolation can be accomplished from the control room. There are two system level switches in the control room and either switch can initiate action to immediately close all MSIVs. The LCO requires two channels to be OPERABLE. Individual valves may also be closed using individual hand switches in the control room. The LCO requires four individual channels to be OPERABLE.

b. Steam Line Isolation-Automatic Actuation Logic and Actuation Relays

Automatic actuation logic and actuation relays consist of the same features and operate in the same manner as described for ESFAS Function 1.b.

For info. only.

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

Manual and automatic initiation of steam line isolation must be OPERABLE in MODES 1, 2, and 3 when there is sufficient energy in the RCS and SGs to have an SLB or other accident. This could result in the release of significant quantities of energy and cause a cooldown of the primary system. The Steam Line Isolation Function is required in MODES 2 and 3 unless all MSIVs are closed and de-activated. In MODES 4, 5, and 6, there is insufficient energy in the RCS and SGs to experience an SLB or other accident releasing significant quantities of energy.

c. Steam Line Isolation-Containment Pressure-High High

This Function actuates closure of the MSIVs in the event of a LOCA or an SLB inside containment to maintain three unfaulted SGs as a heat sink for the reactor, and to limit the mass and energy release to containment. The Containment Pressure - High High function is described in ESFAS Function 2.C.

Containment Pressure-High High must be OPERABLE in MODES 1, 2, and 3, when there is sufficient energy in the primary and secondary side to pressurize the containment following a pipe break. This would cause a significant increase in the containment pressure, thus allowing detection and closure of the MSIVs. The Steam Line Isolation Function remains OPERABLE in MODES 2 and 3 unless all MSIVs are closed and de-activated. In MODES 4, 5, and 6, there is not enough energy in the primary and secondary sides to pressurize the containment to the Containment Pressure-High High setpoint.

d. Steam Line Isolation-Steam Line Pressure

(1) Steam Line Pressure-Low

Steam Line Pressure-Low provides closure of the MSIVs in the event of an SLB to maintain three unfaulted SGs as a heat sink for the reactor, and to limit the mass and energy release to containment. This Function provides closure of the MSIVs in the event of a feed line break to ensure a supply of steam for the turbine driven AFW pump.

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

Steam Line Pressure-Low Function must be OPERABLE in MODES 1, 2, and 3 (above P-11), with any main steam valve open, when a secondary side break or stuck open valve could result in the rapid depressurization of the steam lines. This signal may be manually blocked by the operator below the P-11 setpoint. Below P-11, an inside containment SLB will be terminated by automatic actuation via Containment Pressure-High High. Stuck valve transients and outside containment SLBs will be terminated by the Steam Line Pressure-Negative Rate-High signal for Steam Line Isolation below P-11 when SI has been manually blocked. The Steam Line Isolation Function is required in MODES 2 and 3 unless all MSIVs are closed and de-activated. This Function is not required to be OPERABLE in MODES 4, 5, and 6 because there is insufficient energy in the secondary side of the unit to have an accident.

Steam Line Isolation
Steam Line Pressure-Low

(2) Steam Line Pressure-Negative Rate-High

Steam Line Pressure-Negative Rate-High provides closure of the MSIVs for an SLB when less than the P-11 setpoint, to maintain at least one unfaulted SG as a heat sink for the reactor, and to limit the mass and energy release to containment. When the operator manually blocks the Steam Line Pressure-Low main steam isolation signal when less than the P-11 setpoint, the Steam Line Pressure-Negative Rate-High signal is automatically enabled. Steam Line Pressure-Negative Rate-High provides no input to any control functions. Thus, three OPERABLE channels are sufficient to satisfy requirements with a two-out-of-three logic on each steam line.

Steam Line Pressure-Negative Rate-High must be OPERABLE in MODE 3 when less than the P-11 setpoint, when a secondary side break or stuck open valve could result in the rapid depressurization of the steam line(s). In MODES 1 and 2, and in MODE 3, when above the P-11 setpoint, this signal is automatically disabled and the Steam Line Pressure-Low signal is automatically enabled. The Steam Line Isolation Function is required to be OPERABLE in

ATTACHMENT 2

REPRINTED PAGES OF AFFECTED TECHNICAL SPECIFICATION AND BASES

Table 3.3.2-1 (page 3 of 5)
Engineered Safety Feature Actuation System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	NOMINAL TRIP SETPOINT
4. Steam Line Isolation (continued)						
(2) Negative Rate - High	3[b][c]	3 per steam line	D	SR 3.3.2.1 SR 3.3.2.5 SR 3.3.2.8 SR 3.3.2.9	≤ 120[d] psi	100[d] psi
5. Turbine Trip and Feedwater Isolation						
a. Turbine Trip						
(1) Automatic Actuation Logic and Actuation Relays	1,2	2 trains	I	SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.6	NA	NA
(2) SG Water Level-High High (P-14)	1,2	3 per SG	J	SR 3.3.2.1 SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.5 SR 3.3.2.6 SR 3.3.2.8 SR 3.3.2.9	≤ 85.6%	83.9%
(3) Safety Injection	Refer to Function 1 (Safety Injection) for all initiation functions and requirements. See item 5.a.(1) for Applicable MODES.					
b. Feedwater Isolation						
(1) Automatic Actuation Logic and Actuation Relays	1,2[e], 3[e]	2 trains	H	SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.6	NA	NA
(2) SG Water Level-High High (P-14)	1,2[e], 3[e]	3 per SG	D	SR 3.3.2.1 SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.5 SR 3.3.2.6 SR 3.3.2.8 SR 3.3.2.9	≤ 85.6	83.9%

(continued)

(b) Except when all MSIVs are closed and de-activated.
(c) Trip function automatically blocked above P-11 (Pressurizer Pressure) interlock and may be blocked below P-11 when Steam Line Isolation Steam Line Pressure-Low is not blocked.
(d) Time constant utilized in the rate/lag controller is ≥ 50 seconds.
(e) Except when all MFIVs, MFCVs, and associated bypass valves are closed and de-activated or isolated by a closed manual valve.

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

Steam Line Pressure-Low Function must be OPERABLE in MODES 1, 2, and 3 (above P-11), with any main steam valve open, when a secondary side break or stuck open valve could result in the rapid depressurization of the steam lines. This signal may be manually blocked by the operator below the P-11 setpoint. Below P-11, an inside containment SLB will be terminated by automatic actuation via Containment Pressure-High High. Stuck valve transients and outside containment SLBs will be terminated by the Steam Line Pressure-Negative Rate-High signal for Steam Line Isolation below P-11 when Steam Line Isolation Steam Line Pressure-Low has been manually blocked. The Steam Line Isolation Function is required in MODES 2 and 3 unless all MSIVs are closed and de-activated. This Function is not required to be OPERABLE in MODES 4, 5, and 6 because there is insufficient energy in the secondary side of the unit to have an accident.

(2) Steam Line Pressure-Negative Rate-High

Steam Line Pressure-Negative Rate-High provides closure of the MSIVs for an SLB when less than the P-11 setpoint, to maintain at least one unfaulted SG as a heat sink for the reactor, and to limit the mass and energy release to containment. When the operator manually blocks the Steam Line Pressure-Low main steam isolation signal when less than the P-11 setpoint, the Steam Line Pressure-Negative Rate-High signal is automatically enabled. Steam Line Pressure-Negative Rate-High provides no input to any control functions. Thus, three OPERABLE channels are sufficient to satisfy requirements with a two-out-of-three logic on each steam line.

Steam Line Pressure-Negative Rate-High must be OPERABLE in MODE 3 when less than the P-11 setpoint, when a secondary side break or stuck open valve could result in the rapid depressurization of the steam line(s). In MODES 1 and 2, and in MODE 3, when above the P-11 setpoint, this signal is automatically disabled and the Steam Line Pressure-Low signal is automatically enabled. The Steam Line Isolation Function is required to be OPERABLE in

ATTACHMENT 3

DESCRIPTION OF PROPOSED CHANGES AND TECHNICAL JUSTIFICATION

DESCRIPTION OF PROPOSED CHANGES AND JUSTIFICATIONS

TECHNICAL SPECIFICATION (TS) 3.3.2 AND BASES, ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION

This License Amendment Request (LAR) will correct an inadvertent TS change omission made by Duke during the submittal of LARs associated with TS Amendment 182/164 and Amendment 184/166.

Duke LAR dated October 6, 1997, as supplemented by letter dated August 24, 1998 (the first LAR), included two versions of TSs, one for former TS 3/4.3.2, and one for Standardized TS (STS) 3.3.2. The first LAR was for deleting all references to the Safety Injection Steam Line Pressure-Low function. This function was deleted due to redundant Safety Injection signals being available during design basis accidents. In the first LAR, all concerned references were correctly deleted from former TS 3/4.3.2 but were not correctly deleted from STS 3.3.2. Specifically, the concerned reference was not deleted from Footnote (c) to STS Table 3.3.2-1 and from the Bases of STS 3.3.2 Function 4.d.(1). The NRC approved the changes to former TS 3/4.3.2 in the first LAR by TS Amendment 182/164 dated September 22, 1998.

Duke LAR dated May 27, 1997, as supplemented by letters dated March 9, March 20, April 20, June 3, June 24, July 7, July 21, August 5, September 8 and September 15, 1998 (the second LAR), proposed full conversion from former TSs to STSs. The changes to STS 3.3.2, as proposed in the first LAR, were similarly proposed in the second LAR. The NRC approved the second LAR by TS Amendment 184/166 dated September 30, 1998. As a result of the omission in the first LAR for STS 3.3.2, TS Amendment 184/166 contained the same omission for STS 3.3.2.

This LAR will correct the TS omission mentioned above. The reference to Safety Injection Steam Line Pressure-Low in Footnote (c) to STS Table 3.3.2-1 is proposed to be replaced with Steam Line Isolation Steam Line Pressure-Low. The reference to Safety Injection in the Bases of STS 3.3.2 Function 4.d.(1) is proposed to be replaced with Steam Line Isolation Steam Line Pressure-Low. These changes are consistent with those approved by the NRC in TS Amendment 182/164.

ATTACHMENT 4

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

As required by 10 CFR 50.91(a)(1), this analysis is provided to demonstrate this License Amendment Request (LAR) does not involve a significant hazards consideration.

This LAR will correct an inadvertent Technical Specification (TS) change omission made by Duke during the submittal of LARs associated with TS Amendment 182/164 and Amendment 184/166.

Conformance of this LAR to the standards for a determination of no significant hazards, as defined in 10 CFR 50.92, is shown in the following:

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

No. Approval and implementation of this LAR will have no effect on accident probabilities or consequences since the proposed changes are consistent with those previously reviewed and approved by the NRC in TS Amendment 182/164.

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

No. This LAR does not involve any physical changes to the plant. Therefore, no new accident causal mechanisms will be generated. The proposed changes are consistent with those previously reviewed and approved by the NRC in TS Amendment 182/164. Consequently, plant accident analyses will not be affected by these changes.

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

No. Margin of safety is related to the confidence in 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 affected by the proposed changes since they are consistent with those previously reviewed and approved by the NRC in TS Amendment 182/164.

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION (CONT'D)

CONCLUSION

Based on the preceding analysis, it can be concluded that this LAR does not involve a significant hazards consideration as defined in 10 CFR 50.92.

ATTACHMENT 5

ENVIROMENTAL ASSESSMENT/IMPACT STATEMENT

ENVIRONMENTAL ASSESSMENT/IMPACT STATEMENT

This License Amendment Request (LAR) has been reviewed against the criteria of 10 CFR 51.22 for environmental considerations. This LAR does not involve a significant hazards consideration, increase the types and amounts of effluents that may be released offsite, or result in the increase of individual or cumulative occupational radiation exposures. Therefore, this LAR meets the criteria provided by 10 CFR 51.22(c)(9) for categorical exclusion from the requirement for an Environmental Impact Statement.