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SUBJECT: Suppls proposed amends to TS, changing current Mechanical Superintendent & I&E Superintendent titles to Mechanical Maint Superintendent & I&E/Maint Support Superintendent, respectively, per NRC concerns communicated in 940628 ltr.

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**DUKE POWER**

July 29, 1994

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

SUBJECT: McGuire Nuclear Station Units 1 & 2  
Docket Nos. 50-369, 50-379

Catawba Nuclear Station Units 1 & 2  
Docket Nos. 50-413, 50-414

Oconee Nuclear Station Units 1, 2, & 3  
Docket Nos. 50-269, 50-270, 50-287  
Proposed Technical Specifications Amendments,  
Supplement 3

Gentlemen:

By letter dated November 11, 1993 and supplemented by letters dated February 23, 1994 and April 12, 1994, Duke Power submitted proposed amendments to the Technical Specifications (TS) for McGuire, Catawba, and Oconee Nuclear Stations. Subsequently, during conversations with members of the NRC Staff, concerns were identified with the position titles being proposed to replace the current Mechanical Superintendent and I and E Superintendent. These concerns were communicated to Duke Power in an NRC letter to M. S. Tuckman dated June 28, 1994.

The NRC felt the proposed position title of "Maintenance Superintendent" was generic to the three Duke nuclear stations and did not reflect the station specific title for these two positions. Following consideration of the identified NRC concerns, it has been decided that these two positions will be titled Mechanical Maintenance Superintendent and I and E/Maintenance Support Superintendent, respectively. These newly proposed titles are consistent among the three Duke nuclear stations and specific to the positions in the Duke Power organization authorized to perform the approvals covered by the affected TS. Accordingly, the proposed TS amendments are hereby being further supplemented, and the appropriate pages of the original submittal have been revised and are attached to this letter. A copy of this supplement is also being sent to the appropriate North Carolina and South Carolina state officials.

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U. S. Nuclear Regulatory Commission  
July 29, 1994  
Page 2

If there are questions concerning this supplementary information,  
please call J. S. Warren at (704) 382-4986.

Very Truly yours,



M. S. Tuckman

MST/JSW

Attachments Included: Attachment I, Pages 1-6.

Attachment II, Proposed Changes to  
Technical Specifications

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U. S. Nuclear Regulatory Commission  
July 29, 1994  
Page 3

M. S. Tuckman, being duly sworn, states that he is Senior Vice President of Duke Power Company; that he is authorized on the part of said company to sign and file with the U. S. Nuclear Regulatory Commission these revisions to the McGuire Nuclear Station License Nos. NPF-9 and NPF-17, Oconee Nuclear Station License Nos. NPF-38, NPF-47 and NPF-55, and Catawba Nuclear Station License Nos. NPF-35 and NPF-52; and, that all statements and matters set forth therein are true and correct to the best of his knowledge.

M. S. Tuckman  
M. S. Tuckman, Senior Vice President

Subscribed and sworn to before me on this 31<sup>ST</sup> day of July, 1994.

Mary P. Delms  
Notary Public

My Commission Expires:

JAN 22, 1996

ATTACHMENT I

Duke Power Company  
Catawba Nuclear Station  
McGuire Nuclear Station  
Oconee Nuclear Station

Technical Discussion, No Significant Hazards and an Environmental Impact Analysis

**Technical Discussion**

The purpose of the proposed amendment requests for Catawba, McGuire and Oconee Nuclear Stations are to:

1. Realign the NSRB such that it reports to the Senior Vice-President of the Nuclear Generation Department.
2. Change the reference from "Semiannual" Radioactive Effluent Release Report to "Annual" Radioactive Effluent Release Report in the Liquid Effluents TS (Catawba and McGuire Only) and in the Gaseous Effluents TS (Catawba only).
3. Under the "Procedures and Programs" section (McGuire and Catawba only) and under the "Technical Review and Control Activities" section (Oconee only), change the reference from "group" manager to "appropriate division" manager.
4. Under the "Technical Review and Control Activities" section:
  - a. Change the titles of Mechanical Superintendent and I and E Superintendent on the list of people who can approve modifications to nuclear safety-related structures, systems, and components, prior to implementation, for the Station Manager. Change their titles to Mechanical Maintenance Superintendent and I and E/Maintenance Support Superintendent respectively. Also, add the title of Manager of Engineering to the list of people who can approve modifications, prior to implementation. In sections 6.5.1.5 and 6.6.1b (CNS and MNS only) and section 6.1.2.1e (ONS only), change the titles of Mechanical Superintendent and I and E Superintendent to the titles of Mechanical Maintenance Superintendent and I and E/Maintenance Support Superintendent respectively.
  - b. Clarify the responsibilities of the Safety Assurance Manager.
  - c. For Oconee only, delete the requirement to perform an annual independent Fire Protection Audit.

The bases for these changes are provided in the following paragraphs.

**1. Realign the NSRB such that it reports to the Senior Vice-President of the Nuclear Generation Department.**

This administrative change is being made to reflect the realignment of the NSRB such that it reports to the Senior Vice-President of the Nuclear Generation Department. This realignment is in recognition of the fact that almost all of the activities conducted by the NSRB are for the nuclear function and therefore puts these activities under the direct control of the Senior Nuclear Officer in the company.

As part of November 1, 1991 reorganization, the NSRB reported to the Manager of the Quality Verification Department, who was also the NSRB Director and reported directly to the Executive Vice-President of Nuclear Generation. This organizational structure is depicted in Figures 1 and 2. With the most recent reorganization of the Nuclear portion of the General Office, the NSRB would report to the Manager of Nuclear Assessment & Issues Division, who is also the Director of the NSRB, and who reports directly to the Senior Vice-President of the Nuclear Generation Department. This organizational structure is depicted in Figures 3, 4 and 5. The NSRB will now report to and be appointed by the Senior Nuclear Officer in the company. There will be no changes in the responsibilities or composition of the NSRB.

With the dissolution of the Quality Verification Department, the Quality Verification Department Audits mentioned in the Catawba and McGuire Nuclear Station TS will be renamed the Quality Assurance Program Audits and the Quality Assurance Department Audits mentioned in the Oconee Nuclear Station TS will also be renamed the Quality Assurance Program Audits.

**2. Change the reference from "Semiannual" Radioactive Effluent Release Report to "Annual" Radioactive Effluent Release Report in the Liquid Effluents TS (Catawba and McGuire Only) and in the Gaseous Effluents TS (Catawba only).**

By letters dated January 27, 1993, supplemented March 15, 1993 and June 4, 1993 for McGuire and letters dated February 25, 1993, supplemented May 20, 1993 and August 31, 1993 for Catawba, Duke Power submitted a proposed amendment to the TS for McGuire and Catawba Nuclear Stations, which revised the frequency of the Radiological Effluent Release Report. On July 19, 1993 the NRC approved the proposed amendment for McGuire and approved Catawba's proposed amendment on September 16, 1993. Subsequently, during a review of TS, additional references to the Semiannual Radiological Effluent Release Report was discovered. The Technical Discussion, No Significant Hazards and Environmental Impact Analysis contained in Duke's original submittals and in the NRC's Safety

Evaluation of the amendments remain valid.

3. Under "Procedures and Programs" (McGuire and Catawba only) and under "Technical Review and Control Activities" (Oconee only), change the reference from "group" manager to "appropriate division" manager.

This administrative change reflects the appropriate functional designation of authority. The functional designations had not been finalized when Duke Power submitted its "Reorganization" TS amendments dated January 8, 1992 and supplemented February 13, 1992. These amendments were approved by the NRC on June 2, 1992.

4. Under the "Technical Review and Control Activities" section:
  - a. Change the titles of Mechanical Superintendent and I and E Superintendent on the list of people who can approve modifications to nuclear safety-related structures, systems, and components, prior to implementation, for the Station Manager. Change their titles to Mechanical Maintenance Superintendent and I and E/Maintenance Support Superintendent respectively. Also, add the title of Manager of Engineering to the list of people who can approve modifications, prior to implementation. In Sections 6.5.1.5 and 6.6.1b (CNS and MNS only) and section 6.1.2.1e (ONS only), change the titles of Mechanical Superintendent and I and E Superintendent to the titles of Mechanical Maintenance Superintendent and I and E/Maintenance Support Superintendent respectively.

The Mechanical Superintendent and I and E Superintendent are being replaced with the titles of Mechanical Maintenance Superintendent and I and E/Maintenance Support Superintendent respectively to reflect the new site organizational structure. This change is purely administrative. The Manager of Engineering is being added to the list of people who can approve proposed modifications because the Manager of Engineering has overall responsibility for the design of modifications that are implemented on nuclear safety-related structures, systems and components and therefore is as equally responsible as the Station Manager for ensuring nuclear safety. Also, adding the Manager of Engineering to the list of people who can approve proposed modifications delegates approval authority to the appropriate Site supervisory staff in the event of the unavailability of the Station Manager or his designated direct reports.

**b. Clarify the responsibilities of the Safety Assurance Manager**

The responsibility of the Safety Assurance Manager is being clarified to show that he is only responsible for assuring the development and issuance of reports identifying reportable incidents, unplanned onsite releases of radioactive material and TS violations, but does not necessarily need to approve these reports. These reports are reviewed and approved by the appropriate Site Management. This change brings the Safety Assurance Manager's responsibilities in line with his other responsibilities designated in TS.

**c. For Oconee only, delete the requirement to perform an annual independent Fire Protection Audit**

The current TS wording in Section 6.1.2.1.j requires an annual independent Fire Protection Audit. This wording mandates the expenditure of resources to perform this audit annually regardless of the historical results. The Duke Power Topical Report Quality Assurance Program reflects the requirements of ANSI N18.7 which requires audit frequencies be established commensurate with safety significance. The Duke Power Topical Report also requires audit data be analyzed and the audit schedule be modified as necessary to assess potential weaknesses. This revision will allow the scheduling of fire protection audits based on past performance, but not to exceed three years, rather than an arbitrary requirement of annually. This revision will also allow the expenditure of limited audit resources to be devoted to areas of potential weaknesses rather than auditing predetermined areas without consideration of the strength or weakness of the area based on past performance indicators. This approach was previously approved by the NRC for McGuire Nuclear Station on June 2, 1992 and for Catawba Nuclear Station on May 7, 1992.

**No Significant Hazards Analysis**

10 CFR 50.91 requires that the following be provided concerning whether the proposed amendment requests involved a significant hazards consideration as defined in 10 CFR 50.92. Standards for



determination that an amendment request does not involve a significant hazards consideration are if operation of the facility in accordance with the proposed amendment would not: 1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or 2) Create the possibility of a new or different kind of accident from any previously evaluated; or, 3) Involve a significant reduction in a margin of safety.

The Proposed revisions to realign the NSRB such that it reports to the Senior Nuclear Officer, change the reference from Semiannual to Annual, change the reference from group to division, change the titles of Mechanical Superintendent and I and E Superintendent to the titles of Mechanical Maintenance Superintendent and I and E/Maintenance Support Superintendent, add the Manager of Engineering to the list of people who can approve Modifications, clarify the responsibilities of the Safety Assurance Manager, and delete the requirement to perform an annual independent Fire Protection Audit will not involve a significant increase in the probability or consequences of an accident previously evaluated because the changes do not have any impact upon the design or operation of any plant systems or components.

The proposed revisions will not create the possibility of a new or different kind of accident from any previously evaluated because the changes are administrative in nature and operation of Catawba, McGuire, and Oconee Nuclear Stations in accordance with these TS will not create any failure modes not bounded by previously evaluated accidents.

The proposed revisions will not involve a reduction in a margin of safety because they are administrative in nature.

Accordingly, the proposed revisions do not involve a significant hazard.

#### **Environmental Impact Analysis**

The Proposed TS amendments have been reviewed against the criteria of 10 CFR 51.22 for environmental considerations. The Proposed amendments do not involve a significant hazards consideration, nor increase individual or cumulative occupational radiation exposure, and there is no significant increase in the potential for or consequences from radiological accidents. Realignment of the NSRB such that it reports to the Senior Nuclear Officer, changing the reference from Semiannual to Annual, changing the reference from group to division, changing the titles of Mechanical Superintendent and I and E Superintendent to the titles of Mechanical Maintenance Superintendent and I and E/Maintenance Support Superintendent, adding the Manager of Engineering to the list of people who can

Attachment I  
July 29, 1994  
Page 6

approve modifications, clarifying the responsibilities of the Safety Assurance Manager, deleting the requirement to perform an annual independent Fire Protection Audit are administrative changes. The proposed amendments do not involve any significant hazards considerations, nor increase the types or amounts of effluent released off-site. These changes will not increase the individual or cumulative occupational radiation exposures. Based on this, the proposed TS change meets the criteria given in 10 CFR 51.22(c)(9) for a categorical exclusion from the requirement for an Environmental Impact Statement.

**ATTACHMENT II  
DUKE POWER COMPANY  
McGUIRE NUCLEAR STATION  
OCONEE NUCLEAR STATION  
CATAWBA NUCLEAR STATION**

**PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS**