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**DUKE POWER**

October 24, 1990

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

Subject: McGuire Nuclear Station, Units 1 and 2  
Docket Nos. 50-369, and 50-370  
Proposed Amendment to Technical Specification  
3/4.7.6, Control Area Ventilation System

Pursuant to 10 CFR 50.90, find attached proposed amendments to facility operating licenses NPF-9 and NPF-17 for McGuire Nuclear Station Units 1 and 2, respectively. The purpose of this amendment request is to revise the subject Technical Specification (TS) in-place penetration and by-pass leakage limit requirement from less than 1% to less than 0.05%.

Attachment No. 1 provides the description of the proposed changes, justification and safety analysis to support the change, and no significant hazards consideration discussion. Attachment No. 2 provides a hand marked copy of the proposed changes.

This proposed revision will place a more restrictive surveillance limit in the TSs, and has been implemented administratively pending NRC approval of the TS amendment request.

Pursuant to 10 CFR 50.91(b)(1), the appropriate North Carolina official is also being provided a copy of this amendment request.

Should there be any questions, please contact Paul Guill at (704) 373-2844.

Very truly yours,

A handwritten signature in cursive script that reads "Hal B. Tucker".

Hal B. Tucker

SEL566

Attachments

xc: Mr. S.D. Ebnetter, Regional Administrator  
U.S. Nuclear Regulatory Commission, Region II  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323

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U.S. Nuclear Regulatory Commission  
Document Control Desk  
October 24, 1990  
Page 2

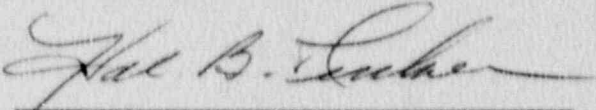
Mr. Dayne Brown, Chief  
Radiation Protection Branch  
Division of Facility Services  
Department of Human Resources  
701 Barbour Drive  
Raleigh, N.C. 27603-2008

Mr. T.A. Reed, NRC Project Manager  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Mr. P.K. Van Doorn  
NRC Senior Resident Inspector  
McGuire Nuclear Station

U.S: Nuclear Regulatory Commission  
Document Control Desk  
October 24, 1990  
Page 3

HAL B. TUCKER, being duly sworn, states that he is 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 this revision to the McGuire Nuclear Station License Nos. NPF-9 and NPF-17; and, that all statements and matters set forth therein are true and correct to the best of his knowledge.



Hal B. Tucker, Vice President  
Nuclear Production Department

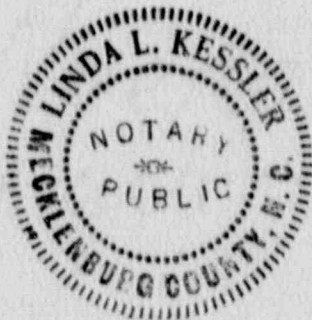
Subscribed and sworn to before me this 24th day of October 1990.



Notary Public

My Commission Expires:

Mar 2, 1994



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October 24, 1990

Attachment No. 1

Duke Power Company  
McGuire Nuclear Station  
Description/Technical Discussion, No Significant Hazards Analysis, and  
Environmental Impact Analysis

Description of Proposed Changes

This proposed amendment to the McGuire Technical Specifications (TS) would:

Change the in-place penetration and bypass leakage requirement in TS 4.7.6.c.1, 4.7.6.f, and 4.7.6.g from less than 1% to less than 0.05%.

Technical Discussion

McGuire TS 3/4.7.6 requires surveillance testing of the Control Room Area Ventilation (VC) system in accordance with Regulatory Guide 1.52 Revision 2, and that the in-place penetration and bypass leakage shall be less than 1%. A review of this TS and Regulatory Guide 1.52 Revision 2 indicated that the Regulatory Guide had been clarified by Generic Letter 83-13 which was issued March 2, 1983. This clarification indicated that a 1% HEPA in-place penetration and a 1% carbon bypass correspond to a HEPA filter and charcoal absorber efficiency of 95%. The McGuire VC system has a HEPA filter and carbon efficiency rating of 99%, and assumes a HEPA filter and carbon absorber efficiency of 99%. Therefore, the existing TS requirement for an in-place penetration and bypass leakage of less than 1% should be changed to less than 0.05%.

Currently, in-place penetration and bypass leakage testing for the VC/VC system is being performed using the proposed limit of less than 0.05%. This limit has been implemented as an administrative requirement pending NRC approval of the proposed TS revision. A review of McGuire in-place penetration and bypass leakage data from previous tests has also been performed and all test results met the acceptance criteria of 0.05% except for two tests. However, subsequent testing prior to the replacement of those HEPA filters and carbon did indicate the bypass leakage was less than 0.05%; however, the 0.05% criteria had not been used because the actual results obtained were within the existing TS limit of less than 1%.

A dose assessment was also performed assuming a 95% decontamination efficiency, which is implied by the existing TS, instead of our license basis of 90% decontamination efficiency. The results indicate a potential control room thyroid dose of 63 Rem which would exceed that allowed by Standard Review Plan 6.4 (30 Rem). Therefore, the TS acceptance criteria for in-place penetration and bypass leakage for the McGuire VC system should be reduced to less than 0.05% based on the 99% decontamination efficiency assumed in the license basis.

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
October 24, 1990  
Attachment No. 1

### No Significant Hazards Discussion

Duke Power Company has determined that this amendment request does not involve a significant hazards consideration. 10 CFR 50.92 states that a proposed amendment involves no significant hazards considerations if operation 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 previously evaluated; or, (3) Involve a significant reduction in the margin of safety.

Operation of McGuire in accordance with the proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated. The request to change the TS requirement for in-place HEPA penetration and carbon bypass leakage from less than 1% to less than 0.05% constitutes a more restrictive requirement that will further ensure adequate filtration of the control room air as required to maintain the control room habitable during all phases of operation. Additionally, the proposed revision complies with Regulatory Guide 1.52 Revision 2 as clarified by Generic Letter 83-13. Operating under this proposed change, the VC system will continue to maintain proper temperature, cleanliness, and pressurization in the control room during plant operation, shutdown, post accident conditions, and all feasible weather conditions. There will be no hardware, system modifications, or operational changes to the VC system as a result of the proposed change. Therefore, the probability of an accident previously evaluated will not increase. By placing the more restrictive requirement on the VC system, the consequences of an accident, specifically the control room dose, will be maintained below regulatory limits.

Operation of the McGuire facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident previously evaluated. As stated above, this revision imposes a more restrictive requirement that will further ensure adequate filtration of the control room air as required to maintain the control room habitable during all phases of operation. There will be no hardware, system modifications, or operational changes to the VC system as a result of the proposed change. Therefore, no new or different accident scenarios are created.

Operation of the McGuire facility in accordance with the proposed amendment would not involve a significant reduction in the margin of safety. By imposing the more restrictive requirement, the proposed revision will ensure the margin of safety provided by the 99% decontamination efficient HEPA and carbon filters will be maintained. By decreasing the allowed HEPA penetration and carbon bypass leakage from less than 1% to less than 0.05%, the designed margin of safety will be maintained, and reflected in the TS.

Based on the preceding discussion, Duke concludes that the proposed amendment request does not involve a significant hazards consideration as defined by 10 CFR 50.92.

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
October 24, 1990  
Attachment No. 1

Environmental Impact Analysis

The proposed TS amendment has been reviewed against the criteria of 10 CFR 51.22 for environmental considerations. Duke has concluded that the proposed changes do not involve a significant hazards consideration, nor increase the types and amounts of effluents that may be released offsite, nor increase individual or cumulative occupational radiation exposures. The proposed TS revision will impose a more restrictive requirement that will ensure control room doses are maintained below limits specified in Standard Review Plan 6.4. Therefore, the proposed TS changes meet the criteria given in 10 CFR 51.22 (c)(9) for a categorical exclusion from the requirement for an Environmental Impact Statement.