



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

9H3
D. Hood

June 19, 1990

MEMORANDUM FOR: Steven A. Varga, Director
Division of Reactor Projects I/II

FROM: Robert B. A. Licciardo, Reactor Engineer (Nuclear)
Plant Systems Branch
Division of Systems Technology

SUBJECT: COMMENTS ON RESOLUTION OF PLANT-SPECIFIC DPO ISSUES
CONCERNING MCGUIRE TECHNICAL SPECIFICATIONS

On May 5, 1990, the writer received an NRC resolution of Plant-Specific Issues (Reference 37) selected from his 1984 DPO Review of the McGuire TS. The writer has reviewed the licensee responses and the NRC Resolution against his concerns and prepared comments as necessary. Primarily, these comments are inserted into a copy of the NRC Report immediately following the related Resolution, and the final document is attached under the Title "Comments on Resolutions of Plant-Specific DPO Issues Concerning McGuire Technical Specifications." Secondly, written comments are made on each Table 1 through 5.

With his comments, the writer, where necessary, has identified and responded to the question raised in his original review (Reference 30), and transmitted to the licensee under Reference 34; and the specific licensee response under Reference 35. This was necessary only when the scope of the original question had been limited during the subsequent NRC Resolution.

Concerning TABLE 1 of the current Resolution, the writer concludes that, based upon the initial documentary evidence provided by the writer under his Reference 30, and supplemented as necessary in response to the licensee comments, there are additional Amendments to the TS required to be made by the licensee and these have been identified by mark-up inside TABLE 3.

Concerning TABLE 2 of the current Resolution, additional FSAR Amendments are noted. Further, the licensee is also required to separately Docket a number of Amendments made to the Set Point Methodology, Reference 18, for the McGuire Units, and which is a part of the necessary (Safety) Analyses of Record outside of the FSAR. Again these items have been identified by mark-up inside TABLE 3.

Concerning TABLE 3, Items which should be relocated into TABLES 1 and 2 have been identified by mark-up. Additional items requiring Amendments to the TS number 15, Amendments to the FSAR, 3, and Amendments to Set Point Methodology, 2.

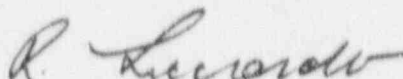
Concerning TABLES 4 and 5, a generalized clarification of the related Applicable Modes has been provided. Additionally and very importantly, a new Item from the writer's original review (Reference 30), namely TS Page 3.4.4-6, "Reactor Coolant System - Cold Shutdown, Loops Are Not Filled" should now be added as this represents the Mid Loop Event of Mode 5 (the Diablo Canyon Case) which was not selected originally by the staff for Review. Further, I draw your attention to the fact that Concern No. 36A Quest (20) of

TABLE 5 TS Page 3/4 9-11 "Residual Heat Removal and Refueling Operations At Low Water Level" concerns the Mid-Loop cooling event in Mode 6 (the Vogtle Case). In respect of TABLE 5, Concern 9A, the writer does request a re-evaluation of the OTSB position on placing DNB Parameters into the Bases, as these are the most important set of parameters establishing reactor safety: A full discussion on these parameters is provided inside the writer's review to Reference 30; and this has also become a predominant feature of the work currently being undertaken on Reactor Core Protection in Modes 3-6.

In respect of Generic DPO Issues - OTSB: It is more complete to say that the issues listed in Tables 4 and 5 deal with Reactor Core Protection in Modes 3-6. Whilst a number of these will involve additions to the structural elements of the Technical Specifications, most of them will involve appropriate extension of Applicability from Modes 1 and 2 into Modes 3 through 6 together with related substantive Amendments to detailed TS requirements.

It is important to recognize that the McGuire Units 1 and 2 are committed under their FSAR to full protection of the Reactor Core against all appropriate Transients and Accidents in Modes 3-6, and that the transference of the final resolution of these McGuire plant-specific TS issues to generic TS resolution, should be done in a manner so as not remove that commitment. It should always be remembered that the writers McGuire TS Review, (Reference 30) is factually based upon the steps necessary for this protection from Licensing Basis Documents, for these Units.

Also, the staff must be aware of the 160 residual items of his 1984 review, which were excluded by the staff from evaluation (Reference 36). A large number of these items are complementary to the current Generic Items, e.g., as indicated earlier, the Diablo Canyon Event was a part of this group, and must thereby ultimately be evaluated to ensure complete protection, and especially in Modes 3-6.



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Enclosures:
Attached

cc w/attachments:

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