Tray

August 30, 1983

Note to: Ralph Birkel, Project Manager, McGuire 1 & 2

From: Mack Cutchin, Attorney, McGuire 1 & 2

SUBJECT: PROPOSED T.S. AMENDMENTS TO LENGTHEN TEST INTERVALS FOR DIESEL

GENERATORS AND TURBINE VALVES

As we discussed by phone, the description of the proposed changes to T.S. 4.8.1.1.2.d and T.S. 4.3.4.2.a and the discussion of the bases for the Staff's proposed NSHC determination in the FR Notice accompanying the package sent over for OELD concurrence are too cryptic.

I suggest that the FR notice be modified as follows:

Add this sentence to paragraph #1.

These amendments were requested by the licensee in a letter dated August 1, 1983.

2. Replace paragraphs #2 & 3 with these paragraphs.

One amendment would change Technical Specification 4.3.1.1.2.d. to permit certain diesel generator surveillance testing during each shutdown for refueling rather than during shutdown at least once each 18 + 25% (22½) months. The change would allow a diesel generator surveillance test on Unit 1 that currently is required by October 27, 1983 to be delayed until the refueling outage scheduled for January 1984 and future tests on both units to be scheduled on a refueling-outage rather than on a calendar-months basis.

A second amendment would change Technical Specification 4.3.4.2.a to permit the cycling of certain turbine valves in the Turbine Overspeed Protection System on a monthly rather than on a weekly basis, consistent with the recommendations of the turbine manufacturer.

3. In place of paragraph 6 substitute these two paragraphs.

Because the increase in diesel generator surveillance test intervals under the amended technical specification will be small compared to the allowed interval under the current technical specification, the proposed amendment to Technical Specification 4.8.1.1.2.d does not involve a significant increase in the probability of an accident previously

8502090090 840518 PDR FOIA ADATO84-156 PDR evaluated or a significant reduction in a margin of safety. Because no changes in operating conditions will result from the increase in the surveillance test interval, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated. Because no changes in any accident analyses will result from the increase in the surveillance test interval, the proposed amendment does not involve any increase in the consequences of an accident previously evaluated.

That no failures to function have occurred during previous surveillance testing of turbine valves on Units 1 and 2 provides confidence that the proposed increase in the surveillance test interval in Technical Specification 4.3.4.2 a does not involve a significant increase in the probability or consequences of an accident previously evaluated or a significant reduction in a margin of safety. Because no changes in operating conditions or accident analyses will result from the increase in the surveillance test interval, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated. Because no changes in any accident analyses will result from the increase in the surveillance test interval, the proposed amendment does not involve any increase in the consequences of an accident previously evaluated.

After such changes are made, I could recommend OELD concurrence in the proposed notice.

cc: J. Gray

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