

December 22, 1983

Note to: J. Scinto

From: R. Rawson

SUBJECT: MCGUIRE AMENDMENT PACKAGE CONCERNING AMENDMENT OF APPENDIX R
REQUIREMENT

This package appears straightforward on its surface, but concerns me nevertheless. An amendment is sought to except from Appendix R, III.J ("Emergency Lighting") requirements the Safe Shutdown Facility and certain access and egress routes. The justification given for the proposed NSHCD is that "implicit in the requirement for the 8-hour battery-powered emergency lights . . . is the assumption that a fire could simultaneously disable the existing emergency lights and safe shutdown equipment." This justification would be valid if the SSF were intended only for the situation of a fire disabling the normal shutdown equipment. If the SSF is required for other situations, however, then equally implicit in the regulation is the assumption that a fire could disable existing emergency lights at a time when the SSF is otherwise needed to shut down the plant, regardless of the cause of the normal shutdown equipment being unavailable. If the SSF at McGuire is required for situations other than fire, then I find it difficult to agree that this amendment does not increase the consequences of an accident or reduce a margin of safety. I also wonder about the precedent being set here. This rationale would appear to apply to every SSF in the country.

I recommend that ELD not concur in this package in its present form.


R.R.

cc: J. Gray

8502090187 840518
PDR FOIA
ADAT084-166 PDR

Description of amendment request: The facility operating licenses for both McGuire Unit 1 and Unit 2 require that the units meet the requirements of 10 CFR 50, Appendix R, III.J, Emergency Lighting. The proposed amendments would allow operation of the facilities without 8-hour battery-powered emergency lights provided in the Standby Shutdown Facility (SSF) and in the access and egress routes through the yard area west of the Turbine Building.

Basis for proposed no significant hazards consideration determination:

The McGuire SSF was provided in order to ensure that an alternative means of shutdown existed in the event that a fire disabled the normal safe shutdown equipment. The SSF is not required by the regulations for any other purpose. The location of the SSF at McGuire is such that a fire which disables the normal safe shutdown equipment cannot simultaneously disable the existing emergency lights. For this reason, adequate lighting would be available for any fire event requiring the SSF to be used without installing additional 8-hour battery-powered emergency lights. Because emergency lights serve only to assist in the mitigation of accidents, the proposed amendments would not involve a significant increase in the probability or consequences of an accident previously evaluated nor do they create the possibility of a new or different kind of accident. Because a fire which disables the normal safe shutdown equipment cannot simultaneously disable the existing emergency lights for the SSF and the access and egress routes through the yard area west of the Turbine Building, the proposed amendments would not involve a significant reduction in a margin of safety. Based on the above, the Commission proposes to find that the proposed amendments do not involve a significant hazards consideration.