

SURVEILLANCE REQUIREMENTS (Continued)

- b. At least once per 31 days and within 6 hours after each solution volume increase of greater than or equal to 1% of tank volume by verifying the boron concentration of the accumulator solution;
- c. At least once per 31 days when the RCS pressure is above 2000 psig by verifying that power to the isolation valve operator is disconnected by removal of the breaker from the circuit.

4.5.1.1.2 Each cold leg injection accumulator water level and pressure channel shall be demonstrated OPERABLE:

- a. At least once per 31 days by the performance of an ANALOG CHANNEL OPERATIONAL TEST, and
- b. At least once per 18 months by the performance of a CHANNEL CALIBRATION.

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Attachment 2

Justification and Safety Analysis

The proposed amendment would delete the requirement to test the automatic actuation feature of the cold leg accumulator isolation valves. The automatic actuation feature has been made obsolete by a Westinghouse approved operating procedure.

The cold leg accumulators are designed to automatically inject borated water into the Reactor Coolant System (RCS) cold legs in the case of a rapid RCS depressurization. As required by the operating procedure, during a planned depressurization, the cold leg accumulator isolation valves are manually closed after the RCS pressure is reduced below 1000 psig to prevent inadvertent injection of the accumulator contents into the RCS. During subsequent start-ups, the valves must be opened to place the cold leg accumulators in service before exceeding 1000 psig.

The current procedures at McGuire require that the Cold Leg Accumulator Isolation valves are open during normal operation. The possibility of inadvertent closure of the isolation valves is eliminated by disconnecting the power during normal operation, as the valves require no movement to fulfill their safety function. The testing requirement that the valves open upon generation of an Engineered Safeguards Signal is not necessary since the valves are kept open during normal operation. The testing of the automatic actuation feature of these isolation valves is not required as this feature is not used during plant operation above 1000 psig or for any other safety function. The proposed amendment removes an unnecessary specification and does not adversely affect plant safety.

Attachment 3

Analysis of Significant Hazards Consideration

As required by 10CFR50.91, this analysis provides a determination that the proposed amendment of the Technical Specifications does not involve significant hazards consideration as defined by 10CFR50.92.

The testing requirement for the automatic actuation feature of the isolation valves on the cold leg accumulator discharge lines is not necessary as these valves are kept open during normal operation of the plant. The automatic actuation feature is not required to perform any safety function during normal operation or under accident conditions.

The operability of the automatic actuation feature is only necessary when its operability is being tested. The proposed amendment deletes the testing requirement for the automatic actuation feature as the feature is not necessary and fulfills no safety function.

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 accident previously evaluated; or
- 3) involve a significant reduction in a margin of safety.

Based upon the preceding analysis, Duke Power Company concludes that the proposed amendment does not involve a significant hazards consideration.