

DUKE POWER COMPANY

P.O. BOX 33189
CHARLOTTE, N.C. 28242

TELEPHONE
(704) 373-4531

HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

January 11, 1988

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

Subject: Catawba Nuclear Station, Units 1 and 2
Docket Nos. 50-413 and 50-414
McGuire Nuclear Station, Units 1 and 2
Docket Nos. 50-369 and 50-370
Technical Specification Amendment
Generic Letter 87-09

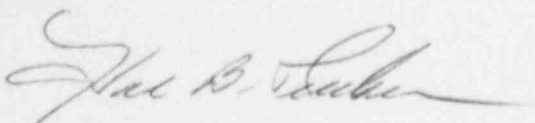
Dear Sir:

This letter contains a proposed amendment to the Technical Specifications for Facility Operating License Nos. NPF-35 and NPF-52 for Catawba Units 1 and 2 and Facility Operating License Nos. NPF-9 and NPF-17 for McGuire Units 1 and 2. The attachment request involves incorporating into the Technical Specifications the recommendations of NRC Generic Letter 87-09 dealing with Sections 3.0 and 4.0. The attachment contains the proposed changes and a discussion of the justification and safety analysis. The analysis is included pursuant to 10 CFR 50.91 and it has been concluded that the proposed amendments do not involve significant hazards considerations.

This request involves one amendment request to Catawba's and McGuire's Technical Specifications. Accordingly, pursuant to 10 CFR 170.21 a check for \$150.00 is enclosed.

Pursuant to 10 CFR 50.91 (b) (1) the appropriate South Carolina and North Carolina State Officials are being provided a copy of this amendment request.

Very truly yours



Hal B. Tucker

RWO/1221/sbn

Enclosure

*Acc'd w/check
1/11 \$150
18439398*

8801150309 880111
PDR ADDCK 05000369
P PDR

U. S. Nuclear Regulatory Commission
January 11, 1988
Page Two

xc: Dr. J. Nelson Grace, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Mr. Heyward Shealy, Chief
Bureau of Radiological Health
South Carolina Department of Health &
Environmental Control
2600 Bull Street
Columbia, South Carolina 29201

American Nuclear Insurers
c/o Dottie Sherman, ANI Library
The Exchange, Suite 245
270 Farmington Avenue
Farmington, CT 06032

M&M Nuclear Consultants
1221 Avenue of the Americas
New York, New York 10020

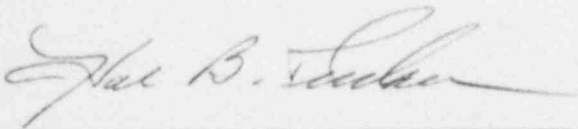
INPO Records Center
Suite 1500
1100 Circle 75 Parkway
Atlanta, Georgia 30339

Mr. P. K. Van Doorn
NRC Resident Inspector
Catawba Nuclear Station

Mr. W. T. Orders
NRC Resident Inspector
McGuire Nuclear Station

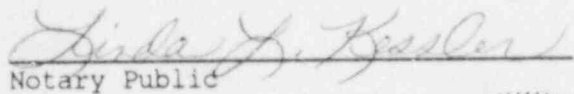
Mr. Dayne Brown, Chief
Radiation Protection Branch
Division of Facility Services
Department of Human Resources
P. O. Box 12200
Raleigh, North Carolina 27605

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 Nuclear Regulatory Commission this revision to the Catawba Nuclear Station Technical Specifications, Appendix A to License No. NPF-35 and NPF-52 and the McGuire Nuclear Station Technical Specifications, Appendix A to 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

Subscribed and sworn to before me this 11th day of January, 1988.


Notary Public

My Commission Expires:

May 1989



ATTACHMENT 1

DISCUSSION AND ANALYSIS OF
NO SIGNIFICANT HAZARDS CONSIDERATIONS

DISCUSSION AND ANALYSIS OF NO SIGNIFICANT HAZARDS CONSIDERATIONS

The proposed amendments to the Catawba and McGuire Technical Specifications would incorporate the recommendations provided in the NRC's Generic Letter 87-09 dated June 4, 1987. The proposal would also add Specification 4.0.6 to the Catawba Technical Specifications. Specification 4.0.6 is clarification necessary due to having the Unit 1 and 2 specifications in a combined document. Specification 4.0.6 is already contained in the McGuire Specifications.

The changes to Specification 3.0.4, 4.0.3 and 4.0.4 are those changes recommended in Generic Letter 87-09.

The change to 3.0.4 would alleviate unnecessary restrictions on mode changes. This proposal would now allow mode changes when in an ACTION statement that allows continued operation for an unlimited period of time. With the change to Specification 3.0.4, individual exceptions to 3.0.4 where the ACTION statement does not require a shutdown are no longer necessary. Exceptions to 3.0.4 in Specifications that do require a plant shutdown will be retained. Deletion of the appropriate exceptions are provided in the attached marked-up Specifications.

The proposed change to 4.0.3 would eliminate unnecessary shutdowns which are now required due to inadvertent surpassing of surveillance intervals. The change would allow delaying compliance with an ACTION statement for up to 24 hours in order to allow performance of a missed surveillance. Therefore, if a missed surveillance can be performed within 24 hours, the plant will not have to be placed in a shutdown condition.

The proposed change to 4.0.4 is necessary to allow the plant to proceed through or to required operational modes to comply with ACTION requirements even though applicable surveillance requirements may not have been performed.

The Staff, in their Generic Letter, concluded that these modifications would result in improved Technical Specifications and encouraged licensees to propose these changes.

Modification of the Bases sections for Catawba's and McGuire's Specifications are also proposed. These changes are also taken from Generic Letter 87-09.

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 from any accident previously evaluated; or
 - (3) Involve a significant reduction in a margin of safety.
- (1) The proposed amendment does not involve an increase in the probability or consequences of any previously evaluated accident.

The change to Specification 3.0.4 will allow mode changes while the Unit is in an ACTION statement which does not prohibit power operation. Exception to 3.0.4 has already been taken in many of the individual ACTION statements.

DISCUSSION AND ANALYSIS OF NO SIGNIFICANT HAZARDS CONSIDERATIONS (Continued)

Incorporating the proposed change into 3.0.4 will ensure that exceptions will be consistently applied when justified. Deletion of the individual exceptions will have no impact upon the requirements in the Specifications since the exception to 3.0.4 will now be contained within 3.0.4.

The change to Specification 4.0.3 will allow delay of compliance with ACTION requirements for up to 24 hours when a surveillance has been missed. This is not significant in that surveillances normally verify system or component operability as opposed to discovering inoperability. Without the 24 hour delay it is very likely that a missed surveillance would force the Unit to be placed in a shutdown condition. Avoidance of this thermal cycling is beneficial and far outweighs any disadvantages associated with the additional 24 hours in which to perform a missed surveillance.

The change to Specification 4.0.4 will not result in a change to the design or operation of the facility and is administrative in nature. This change will not result in an increase in the probability or consequences of an accident.

The addition of Specification 4.0.6 to the Catawba Technical Specifications provides clarification to the requirements outlined in the Specifications and will not increase the probability or consequences of an accident.

- (2) The proposed changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The change to 3.0.4 will allow the plant to continue operation in an ACTION statement which already allows continued operation. As such, no new modes of operation are being introduced by this change.

The change to 4.0.3 would allow the plant to continue operation for an additional 24 hours after discovery of a missed surveillance. Missing a surveillance does not mean that a component or system is inoperable. In most cases surveillances demonstrate the continued operability of the components and systems. All systems and components currently required to be verified operable by Technical Specification requirements will continue to be maintained operable. This change will not effect the design of the plant and will not allow the plant to be operated outside the currently allowed modes of operation.

The change to 4.0.4 will alleviate a contradiction within the specifications. This change is administrative in nature and does not effect any of the accident analyses.

The addition of 4.0.6 to the Catawba Specifications is also administrative in nature and does not effect any of the accident analyses.

- (3) The proposed amendments will not involve a significant reduction in a margin of safety.

The change to Specification 3.0.4 will allow mode changes in ACTION statements that do not require plant shutdowns. Exceptions to 3.0.4 are

DISCUSSION AND ANALYSIS OF NO SIGNIFICANT HAZARDS CONSIDERATIONS (Continued)

already contained within many of the applicable ACTION statements. Incorporating the exception to 3.0.4 within 3.0.4 will ensure consistent application of the exception.

The change to 4.0.3 will allow up to 24 hours to perform a missed surveillance. In most cases this will eliminate the need for a plant shutdown. The overall effect is a net gain in plant safety due to avoidance of unnecessary shutdowns due to missed surveillances.

The change to 4.0.4 is administrative in nature and therefore does not effect any margin of safety.

The addition of 4.0.6 to Catawba's Specifications is also administrative and does not effect any margin of safety.

The NRC in issuing Generic Letter 87-09 recommended these changes and concluded that they would result in improved Technical Specifications. Duke Power concurs with this conclusion.

For the reasons stated above, it is concluded that the proposed amendment does not involve significant hazards considerations.