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# CHANGES TO ITS SUBMITTAL

MCGUIRE NUCLEAR STATION

**ENCLOSURE 2** 

# CHANGES TO MCGUIRE ITS SUBMITTAL

 Special Test Exceptions CTS 3.10.5 for Position Indication System – Shutdown was incorrectly shown in the CTS markup for ITS 3.1.8 as being deleted (DOC A26). This LCO provides an exception during testing for the rod position indication system during shutdown. The rod position system LCO, CTS 3.1.3.3, was previously relocated to the Selected Licensee Commitments Manual (UFSAR Chapter 16). Discussion of Change R7 is revised to indicate that the associated test exception, CTS 3.10.5, is also relocated to the Selected Licensee Commitments Manual.

SPECIFICATION 3.1.8 SPECIAL TEST EXCEPTIONS 3/4.10.5 POSITION INDICATION SYSTEM - SHUTDOW LIMITING CONDITION FOR OPERATION 3.10.5 The limitations of Specification 3.1.3.3 may be suspended during the performance of individual full-length shutdown and control rod drop time measurements provided: Only one shatdown or control bank is withdrawn from the fully а. inserted position at a time, and b. The rog position indicator is OPERABLE during the withdrawal of the rods/ APPLICABILITY: MODES 3, 4, and 5 during performance of rod drop time measurements. ACTION; With the Position Indication System inoperable or with more than one bank of roas withdrawn, immediately open the Reactor trip breakers. SURVEILLANCE REQUIREMENTS 4.10.5 The above required Rod Position Indication Systems shall be determined to be OPERABLE within 24 hours prior to the start of and at least once per 24 hours thereafter during rod drop time measurements by verifying the Demand Position Indication System and the Rod Position Indication Systems agree Within 12 steps when the rods are stationary, and a. b. Within 24 steps during rod motion. This requirement is not applicable during the initial calibration of the Rod Position Indication System provided: (1)  $K_{eff}$  is maintained less than or equal to 0.95, and (2) only one shutdown or coptrol rod bank is withdrawn from the fully inserted position at one time. McGUIRE - UNIT 1 3/4 10-5 Amendment No. 166

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Specification 31,8 SPECIAL TEST EXCEPTIONS 3/4.10.5 POSITION INDICATION SYSTEM / SHUTDOWN LIMITING CONDITION FOR OPERATION. 3.10.5 The limitations of Specification 3.1.3.3 may be suspended during the performance of individual foll-length shutdown and control rod drop time, measurements provided: Only one shutdown or control bank is withdrawn from the fully a. inserted position at a time, and The rod position indicator is OPERABLE during the withdrawal of the b. rods.\* MODES 3, 4, and 5 during performance of rod drop time APPLICABILITY: measurements. ACTION: With the Position Indication System inoperable or with more than one bank of rods withdrawn, immediately open the Reactor trip breakers. SURVE MLANCE REQUIREMENTS 4.10.5 The above required Rod Position Indication Systems shall be determined to be OPERABLE within 24 hours prior to the start of and at least once per 24 hours thereafter during rod drop time measurements by verifying the Demand Position Indication System and the Rod Position Indication Systems agree: Within 12 steps when the rods are stationary, and a., Within 24 steps during rod motion. b. \*This requirement is not applicable during the initial calibration of the Rod Position Indication System provided: (1)  $K_{eff}$  is maintained less than or equal to 0.95, and (2) only one shutdown or control rod bank is withdrawn from the fully inserted position at one time. MCGUIRE - UNIT 2 3/4 10-5 Amendment No. 148

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to shutdown to MODE 3 is retained as ITS 3.1.5 Action B. The changes are considered administrative and are consistent with NUREG-1431.

- A.22 Not used.
- A.23 Specific requirements for the control bank sequence and overlap limits have been added to CTS 3.1.3.6 and 4.1.1.1.1.b on control bank insertion limits. ITS 3.1.6 clearly identifies that these parameters are required to be met by including specific actions and surveillance requirements. These parameters have always been a part of the control bank insertion limit as detailed by the figure in the COLR. No technical requirements are modified and the change is considered administrative in nature since it clarifies information already contained within the existing requirements. The change is consistent with NUREG-1431.
- A.24 CTS 3.10.3 allows exceptions to rod alignment and insertion limits during PHYSICS TESTING in MODE 2. With the deletion of CTS 3.1.1.1 SDM is MODE 1 and 2 (see Doc A.2), it is necessary to add appropriate requirements, actions, and surveillances to the test exception LCO. These requirements are retained as ITS LCO 3.1.8. The change is administrative in nature, and no technical change is made. This change is consistent with NUREG-1431.
- A.25 CTS 3.10.3.b requires the reactor trip setpoints of the intermediate and power range channels to be set at 25% during performance of PHYSICS TESTS. This information is redundant to the LCO 3.3.1, "RTS Instrumentation" which requires that the trip setpoints for the channels be set to 25% for the intermediate and power ranges in MODE 2. The deletion of redundant requirements is administrative and does not represent a technical change. This change is consistent with NUREG-1431.
- A.26 The exceptions to SDM provided by CTS 3.10.1, the exceptions for rod insertion and power distribution limits provided by CTS 3.10.2, and the exceptions for rod position indication provided by CTS 3.10.5 are no longer needed and are deleted. SDM will be maintained within the limits specified in the COLR during PHYSICS TESTS. PHYSICS TESTS will be conducted in MODE 2, thus the MODE 1 exception provided by CTS 3.10.2 is not needed. Rod position exception is no longer needed in MODES 3. 4. or 5 and in MODE 2

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with  $K_{eff} < 1.0$ . The ITS 3.1.8 test exceptions for PHYSICS TESTS in MODE 2 provides an exception to rod alignment requirements. This change is consistent with NUREG-1431.

- A.27 CTS 3.10.3.a allows exceptions to certain LCOs for the performance of physics tests provided power is limited to  $\leq 5\%$  of Rated Thermal Power (RTP). This statement is redundant because the Applicability for this LCO is MODE 2 ( $\leq 5\%$  RTP). ITS LCO 3.1.8 retains this same applicability during PHYSICS TESTS. With this deletion, no technical requirements are modified and the change is considered to be administrative in nature. This change is consistent with NUREG-1431.
- A.28 CTS 4.1.1.1.1.a and 4.1.1.2.a require verifying SDM when an inoperable (immovable or untrippable) control rod is discovered. This requirement is already contained in CTS 3.1.3.1 and is retained in ITS LCO 3.1.4 for an untrippable control rod. These requirements already provide adequate assurance that SDM is verified and therefore, the requirements of 4.1.1.1.1.a and 4.1.1.2.a are redundant and eliminated. No technical requirements are deleted by the elimination of this redundant requirement and the change is considered administrative. This change is consistent with NUREG-1431.
- A.29 CTS 3.1.3.1 Action c.2 and c.3 contain the phrase, "The rod is declared inoperable" when a rod is not within alignment limits. This wording does not add any clarity to the actions and is eliminated. The format in the ITS is such that actions are only entered when the LCO is not met, i.e. the component is inoperable. Therefore, the additional wording is not necessary for inclusion within ITS 3.1.4. No technical requirements are deleted by the elimination of this wording and the change is considered administrative. This change is consistent with NUREG-1431.
- A.30 CTS 3.1.3.6 requires that an out of limit control bank be restored within 2 hours or that power be reduced to match the power limit for the existing insertion position. ITS 3.1.6 only requires that the insertion limit be restored. The existing actions are somewhat redundant. Since there are only two ways to restore compliance (i.e., withdraw the control banks or reduce power to match control bank position), the requirement to restore limits is

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is required before the shutdown margin is lost. Operations of the boration subsystem is not assumed to mitigate this event.

The CVCS System is not used for, nor is capable of, detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA. The CVCS System is not used to indicate status of, or monitor a process variable, design feature, or operating restriction that is an initial condition of a DBA or transient. The CVCS System is not part of a primary success path in the mitigation of a DBA or transient. As discussed in Section 4.0 (Appendix A, page A-6) and summarized in Table 1 of WCAP-11618, the loss of the CVCS System was found to be a non-significant risk contributor to core damage frequency and offsite releases. Duke Power Company has reviewed this evaluation, considers it applicable to the plant, and concurs with the assessment.

fince the screening criteria have not been satisfied, the Borated Water Sources - Operating LCO and Surveillances may be relocated to the Selected Licensee Commitments Manual (UFSAR Chapter 16).

R.7 CTS 3.1.3.3 specifies requirements for rod position indication in MODES 3, 4, and 5. CTS 3.10.5 provides an exception during testing for rod position indication. Control rod operability is assumed for all transients in which a reactor trip is assumed to occur. However, the ±12 step alignment is not assumed when in MODES 3, 4 or 5, since no reactor power is being generated and the reactor is subcritical. The rod alignment and position indication is only necessary when the reactor is critical, to ensure proper power distribution.

The position indication system is not used for, nor capable of, detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a design basis accident (DBA). The position indication system is not used to indicate status of, or monitor a process variable, design feature, or operating restriction that is an initial condition of a DBA or transient. The position indication system is not part of a primary success path in the mitigation of a DBA or transient. As discussed in Section 4.0 (Appendix A, page A-12) and summarized in Table 1 of WCAP-11618, the loss of the position indication system was found to be a non-significant risk contributor to core damage frequency

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and offsite releases. Duke Power Company has reviewed this evaluation, considers it applicable to the plant, and concurs with the assessment.

Since the screening criteria have not been satisfied, the Position Indication System - Shutdown LCO 3.1.3.3 and its associated testing exception 3.10.5 may be relocated to the Selected Licensee Commitments Manual (UFSAR Chapter 16). Surveillance 4.1.3.3 will be retained in ITS SR 3.1.7.1 for rod position indication in MODES 1 and 2.