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DUKE POWER

October 3, 1988

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

Subject: McGuire Nuclear Station
Docket Nos. 50-369 and 50-370
Proposed Technical Specification Changes - Revision
VP System Automatic Isolation Capability (T.S. 3/4.3.2
and 3/4.3.3.9)

Gentlemen:

My letter of February 17, 1987 (as Supplemented/Revised by letters dated November 19, 1987 and June 3, 1988) submitted proposed license amendments (pursuant to 10CFR50.4 and 50.90) to facility operating licenses NPF-9 and NPF-17 for McGuire Nuclear Station Units 1 and 2, respectively. The proposed amendments addressed a range of issues which were administrative or minor in nature. Some of the proposed amendments have subsequently been approved (ref. license amendment Nos. 83 (unit 1)/69(unit 2)), while others currently remain under NRC review.

Among the proposed amendments which have not yet been approved is a change involving Specification 3/4.3.2 to ensure the operability of the automatic isolation capability of the Containment Purge Ventilation (VP) System from radiation monitor EMF-39 (as required by Specification 3/4.3.3.9) below Mode 4 when the rest of the Solid State Protection System may be taken out of service. The original proposal sought to add the monitor to the Engineered Safety Features Actuation System (ESFAS) Instrumentation Specification (T.S. 3/4.3.2). However, as the monitor is not an ESFAS device and does not serve a safety function (as assumed in the safety analysis), it was determined that it was not appropriate to add the monitor to the specification. Consequently, the November 19, 1987 Supplement/Revision sought to instead add a note in the applicability of the ESFAS Specification to cross-reference the other applicable Specifications (i.e. T.S. 3/4.3.3.9 and 3/4.9.4) involving the operability of the VP System, automatic isolation, and the monitor. The note was to accomplish the intended purpose of maintaining the automatic isolation capability of the VP System (by alerting the users that while the ESFAS may not be required for the existing plant status the monitor and Actuation System are required by other applicable Specifications) without inappropriately adding the monitor to the ESFAS Specification.

Subsequent discussions between members of the Duke and NRC staffs have indicated that cross referencing the Specifications or adding a note to the ESFAS Specification was not considered sufficient by the NRC staff to ensure compliance. The NRC staff reviewer indicates that he finds cross-referencing inappropriate and believes the requirements should be put explicitly in the

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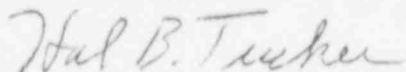
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ESFAS Specification. Accordingly, Duke has decided to include the requirements for VP Isolation explicitly in the ESFAS Specification, though the requirements will be identical and redundant to the requirements of Specification 3/4.3.3.9. Thus, this proposal has been developed that would duplicate the appropriate requirements of Specification 3/4.3.3.9 in Specification 3/4.3.2. Note that the wording of the proposed action statement is requested to be the same as an unrelated Duke McGuire/Catawba proposal dated April 1, 1988 (also currently under NRC review), and that no substantive changes to previous proposals or new requirements are involved.

Attachment 1 contains the revised proposed Technical Specification changes, including an appropriate revision to the Technical Specification bases section. [The proposed note 1 of Table 3.3-3 is part of a separate change contained in the original February 17, 1987 submittal which is also still currently under NRC review, and is not affected by this submittal. The Note is included in this submittal for completeness since the attached revised Technical Specification pages supersede the corresponding pages previously submitted]. Attachment 2 contains a revised justification and safety analysis portion addressing these revised proposals only. The analysis of significant hazards consideration as presented in the referenced previous submittals remain fully valid and need no additional supplement.

Since this submittal revises proposed license amendments provided in my February 17, 1987 submittal, portions of which are still currently under review, no additional amendment fees are necessary. Should there be any questions concerning this matter or if additional information is required, please advise.

Very truly yours,



Hal B. Tucker

PBN/115/mmf

Attachments

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