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86 FEB 25 A10:06

February 11, 1986

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

Re: McGuire Nuclear Station, Unit 2
Docket No. 50-370
Relief From Technical Specification LCO (Temporary Waiver)

Dear Dr. Grace:

This letter constitutes written followup of a request for temporary waiver of technical specification requirements which was made (and subsequently granted) via telecons between Duke Power Company personnel and members of your staff on February 7, 1986. This temporary emergency relief from compliance with technical specification Limiting Conditions for Operation (LCO) avoided unnecessarily shutting down McGuire Unit 2 since the LCO's allowed outage time (AOT) was exceeded prior to completion of corrective actions.

During an exit interview held on February 7, 1986 for NRC/OIE Inspection Report Nos. 50-369/86-05 and 50-370/86-05 a concern was raised by the NRC inspector regarding periodic testing of valves. Upon further investigation by Duke it was determined that valves NI-184 and NI-185 (Train B and Train A Containment Sump Isolation valves) on both McGuire units had not been tested per the requirements of ASME Boiler and Pressure Vessel Code 1980 Edition Section XI paragraph IWV-3300 which states that valves with remote position indicators shall be observed at least once every 2 years to verify that valve operation is accurately indicated. Consequently, since Units 1 and 2 were both in Mode 1 valves 1NI-184 and 185 (Unit 1) and 2NI-184 and 185 (Unit 2) were declared inoperable at 1415 on February 7, 1986 pursuant to Technical Specification 3.5.2 "ECCS Subsystems - Tave $\geq$ 350°F". With one ECCS subsystem inoperable this specification provides for a 72 hour allowed outage time after which the valve (i.e. flow path) would have to be restored to operable status or the unit(s) placed in at least hot standby within the next 6 hours and in hot shutdown within the following 6 hours. However, since both the Train A and B valves were inoperable this LCO action requirement was not met and both units entered Technical Specification 3.0.3 under which action had to be initiated within 1 hour to place the unit(s) in at least hot standby within the next 6 hours and at least hot shutdown within the following 6 hours.

Successful testing of one train's valve within 1 hour would allow declaring that train operable resulting in the unit(s) being in the longer (72 hour) T.S. 3.5.2 action statement until the other train's valve could be tested. Accordingly, Duke initiated efforts to test the Train B valve (NI-184) on each unit within the hour, with the Train A valves (NI-185) to follow. However, since testing of these valves involves isolating and depressurizing the residual heat removal (ND) pumps as well as the valves

being located in a contaminated area it was not certain whether the testing could be accomplished within the allowed time to reach hot standby conditions. Consequently, on February 7, 1986 following discussions between Duke Power Company personnel and members of your staff a 24 hour extension to the requirements of T.S. 3.0.3 was verbally granted for both units. This relief was based on the low probability of an accident requiring use of the ECCS subsystems during this short time period, the fact that periodic testing had been satisfactorily performed on these valves in the past using limit switch indications in the control room (as opposed to the direct visual observation required by the IWV paragraph), and the desire to avoid a thermal cycle on the reactors and associated systems which has real benefits in terms of availability, component lifetime, and safety.

Testing of Unit 1 Train B valve 1NI-184 was satisfactorily completed and the ECCS subsystem train declared operable at 1525 on February 7, 1986; with the Unit 1 Train A ECCS subsystem declared operable at 1655 following completion of testing to its valve (1NI-185). Testing of Unit 2 Train B valve 2NI-184 was begun at 1450 on February 7, 1986, but as a result of problems occurring during this testing the Train B ECCS subsystem was not declared operable until 2255 on February 7, 1986. The Unit 2 Train A valve (2NI-185) was then successfully tested and the ECCS subsystem declared operable at 2340 on February 7, 1986.

A Licensee Event Report will be submitted detailing this event. Duke would like to express its appreciation for the NRC's timely cooperation in this matter. Should there be any questions or if additional information is required, please advise.

Very truly yours,

Hal B. Tucker

Hal B. Tucker

PBN/jgm

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