



Duke Power Company
A Duke Energy Company

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April 20, 1998

U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Document Control Desk

Subject: McGuire Nuclear Station
Docket Numbers 50-369 and -370
Improved Technical Specifications, Supplement 3
TAC Nos. M98964 and M98965

By letter dated March 27, 1998, the NRC transmitted a request for additional information related to Sections 1.0, 2.0, 3.0, and 4.0 of the proposed Improved Technical Specifications (ITS) submitted by Duke Energy May 27, 1997. Enclosure 1 of this letter provides responses to the comments on this section. Immediately following each staff comment (or group of comments) are changes to the ITS submittal necessary to resolve the staff's comment and supplement the initial ITS submittal. Changes are denoted by revision bars to facilitate staff review.

Attachments 5 and 6 of the initial ITS submittal identified changes to the current license which were in addition to changes solely necessary to convert to the improved technical specification format. Upon discussion with the staff, the proposed change to the definition of Dose Equivalent Iodine-131 is being withdrawn from consideration at this time. The revised pages are provided in Enclosure 2 along with revised Attachments 5 and 6 which include removal of this item and identifies additional beyond scope changes included in ITS Supplements 1 and 2.

The pages provided in Enclosures 1 and 2 in this response replace the corresponding pages in the May 27, 1997 submittal, Supplement 1 provided March 9, 1998, and Supplement 2 provided March 20, 1998.

In accordance with Duke administrative procedures and the Quality Assurance Program Topical Report, this response to

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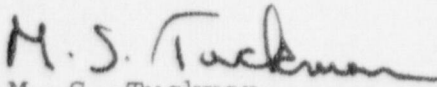
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the request for information has been discussed with representatives of the McGuire Plant Operations Review Committee and the Nuclear Safety Review Board and determined to be within the scope of the original review.

Pursuant to 10 CFR 50.91(b)(1), a copy of this amendment has been provided to the appropriate State of North Carolina officials.

If any additional information is needed, please call Lee A. Keller at 704-382-5826.

Very truly yours,


M. S. Tuckman

Enclosures

xc: w/enclosures

Mr. L. A. Reyes
Administrator, Region II
U. S. Nuclear Regulatory Commission
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Mr. F. Rinaldi
U. S. Nuclear Regulatory Commission
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Mr. S. M. Shaeffer
Senior Resident Inspector
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M. S. Tuckman, being duly sworn, states that he is Executive 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 revisions to the Facility Operating Licenses of McGuire Nuclear Station; and that all the statements and matters set forth herein are true and correct to the best of his knowledge.

M. S. Tuckman

M. S. Tuckman, Executive Vice President

Subscribed and sworn to before me this 20TH day of
April, 1998

Mary P. Nelms

Notary Public

My Commission Expires:

JAN 22, 2001

ENCLOSURE 1

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
SECTIONS 1.0, 2.0, 3.0, and 4.0

Catawba and McGuire Improved TS Review Comments
Section 1.0, Use and Application

1.0-01 JFD 5
Definition of Channel Calibration
Definition of Channel Operational Test (COT)
Definition of Trip Actuating Device Operational Test (TADOT)

The ITS definitions of Channel Calibration, COT, and TADOT omit "display" from the list of items encompassed by these surveillances. Although this is consistent with the CTS definitions, the display should be included. For example, the post-accident monitoring instrumentation channels are display only; the proposed definitions would not seem to apply to those instruments. **Comment:** Revise the two definitions to adopt the word "display" consistent with the STS. Also note that the proposed definitions, if accepted, may require other changes in Section 3.3 and associated Bases.

DEC Response:

The CTS definition is revised to include required displays within the scope of CHANNEL CALIBRATION. The majority of CTS channels which require a calibration are those that perform trip or actuation functions. For those channels, a display is not required to perform the required function, and the display is not required to be calibrated to meet the requirements for OPERABILITY of the channel. However, CTS 4.3.3.6 requires a calibration of the post accident monitoring channels. These required channels are the display portions of the instrument loop only, therefore, the inclusion of required displays within the ITS definition of CHANNEL CALIBRATION is an administrative clarification consistent with current requirements and practices. The COT and TADOT demonstrate the functional ability of actuation devices which change state in response to a change in a monitored parameter, e.g. interlocks, bistables, and or alarms. A display provides indication only information and performs no "actuation" function, therefore, the inclusion of displays within these tests is inappropriate and inconsistent with current technical specifications and current practice. Displays which are required operable by Technical Specifications (e.g. post accident monitoring indicators) are calibrated to ensure their functional ability to display required information.

The NUREG specifications related to displays or indicators are those associated with Post Accident Monitoring and Remote Shutdown. These specifications do not require the performance of a COT. A TADOT is specified by the NUREG for reactor trip breaker indication, but was not adopted by the ITS because it is not part of the current requirements and an indication performs no "actuation" function. Therefore, there are no ITS Bases revisions required by maintaining the current license basis definitions of COT and TADOT.
