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H. B. Barron
Vice President

November 23, 1999

U.S. Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555-0001

SUBJECT: Duke Energy Corporation (DEC)
McGuire Nuclear Station Units 1 and 2
Docket Nos. 50-369/50-370

Proposed Technical Specification Amendment
TS 5.5.11 - Ventilation Filter Testing Program

Pursuant to 10CFR50.90 and 10CFR50.4, this letter submits a license amendment request (LAR) for the McGuire Nuclear Station Facility Operating License (FOL) and Technical Specifications. This amendment is applicable to Facility Operating Licenses NPF-9 and NPF-17 for the McGuire Nuclear Station.

This LAR is being submitted in response to Generic Letter (GL) 99-02 - "Laboratory Testing Of Nuclear-Grade Activated Charcoal". GL 99-02 requested that licensees determine whether their Technical Specifications reference the NRC accepted protocol for laboratory testing of charcoal filters in Engineered Safety Features (ESF) ventilation systems. This protocol is contained in ASTM D3803-1989 - "Standard Test Method for Nuclear-Grade Activated Carbon". Licensees whose Technical Specifications do not reference this standard were directed to either amend their Technical Specifications to reference ASTM D3803-1989 or propose an alternative test protocol.

Upon approval and implementation of this LAR, all Technical Specification required testing of charcoal filters in ESF and non-ESF ventilation systems at McGuire will reference ASTM D3803-1989. GL 99-02 indicates that those systems whose Technical Specifications are revised to incorporate the requirements of ASTM D3803-1989 can use a safety factor as low as 2 when determining the acceptance criteria for charcoal filter efficiencies assumed in their offsite and control room operator dose analyses.

Two ESF ventilation systems, the Annulus Ventilation (VE) System and the Control Area Ventilation (VC) System Technical Specifications already reference the ASTM D3803-1989 protocol. Those systems incorporate a safety factor of 1 in their Technical

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Specification allowable charcoal filter penetrations. The VE and VC systems designs incorporate heaters which reduce humidity and improve filter efficiencies. Reducing the maximum allowed VE and VC charcoal filter methyl iodide penetration to accommodate a safety factor of 2 would result in excessive change out of these charcoal filters without any significant corresponding increase in the health and safety of the public. The current VE and VC maximum methyl iodide penetration values specified in the McGuire Technical Specifications which correlate to the safety factor of 1 were approved by the NRC in a Safety Evaluation Report (SER), dated July 15, 1991, issued in response to McGuire Technical Specification Amendments 122 and 104 (TAC Nos 80129 and 80130). GL 99-02 does not direct licensees to revise systems tested in accordance with ASTM D3803-1989 to incorporate a revised safety factor.

McGuire Technical Specification 5.5.11 - "Ventilation Filter Testing Program" provides the requirements for testing of activated charcoal filters used in the station ESF ventilation systems. With the exception of the Auxiliary Building Filtered Ventilation Exhaust (VA) System, Technical Specification 5.5.11, Section c, references the ASTM D3803-1989 protocol for all ESF ventilation system charcoal testing at McGuire. This LAR will revise Technical Specification 5.5.11, Section c, to ensure it references ASTM D3803-1989 as the test protocol for the VA system charcoal filters. Technical Specification 5.5.11, Section c, also provides requirements for testing of activated charcoal filters used in two non-ESF Systems at McGuire - the Containment Purge and Exhaust (VP) System and the Fuel Building Ventilation (VF) System. This LAR also revises Technical Specification 5.5.11, Section c, to reference ASTM D3803-1989 as the test protocol for these two non-ESF systems.

In addition, this LAR changes the test temperatures and test relative humidity specified in Technical Specification 5.5.11, Section c, to conform to the requirements of the ASTM D3803-1989 test protocol. Finally, using the safety factor of 2 allowed by GL 99-02, the maximum methyl iodide penetration of the VA, VP, and VF charcoal filters specified in Technical Specification 5.5.11, Section c, are being revised to accommodate planned changes in the acceptance criteria for VA, VP, and VF charcoal filter efficiencies assumed in the McGuire offsite and control room operator dose analyses. These future efficiency changes will not result in any degradation in the ability of the affected filters to perform their design function. This LAR will not revise the maximum methyl iodide penetration for the VE and the

VC charcoal filters specified in Technical Specification 5.5.11, Section c, since there are no current plans to revise the acceptance criteria for the VE and VC charcoal filter efficiencies assumed in the McGuire offsite and control room operator dose analyses.

Attachment 1 provides marked up pages of the existing McGuire Technical Specification 5.5.11 showing the proposed changes. Attachment 2 contains the new McGuire Technical Specification pages. The Description of Proposed Changes and Technical Justification is provided in Attachment 3. Pursuant to 10CFR50.92, Attachment 4 documents the determination that this proposed amendment contains No Significant Hazards Considerations. Pursuant to 10CFR51.22 (c)(9), Attachment 5 provides the basis for the categorical exclusion from performing an Environmental Assessment/Impact Statement. Implementation of this amendment to the McGuire FOL and Technical Specifications will not impact the McGuire UFSAR. Pursuant to 10CFR50.91, a copy of this LAR is being forwarded to the appropriate North Carolina State Officials.

In accordance with Duke internal procedures and the Quality Assurance Program Topical Report, this proposed amendment has been previously reviewed and approved by the McGuire Nuclear Station's Plant Operations Review Committee and the Duke Corporate Nuclear Safety Review Board.

Please direct questions on this LAR to Julius Bryant at 704-875-4162.

Very truly yours,



H. B. Barron, Vice President
McGuire Nuclear Station

Attachments

U. S. Nuclear Regulatory Commission
November 23, 1999
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xc: (w/attachments)

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H. B. Barron, being duly sworn, states that he is Site Vice President of McGuire Nuclear Station Duke Energy Corporation; that he is authorized on the part of Duke Energy Corporation to sign and file with the U.S. Nuclear Regulatory Commission this revision to the McGuire Nuclear Station Facility Operating License No.s NPF-9 and NPF-17; and, that all statements and matters set forth therein are true and correct to the best of his knowledge.

H B Barron

H. B. Barron, Vice President
McGuire Nuclear Station
Duke Energy Corporation

Subscribed and sworn to before me this 23th day of November 1999.

Deborah G. Thrap

Notary Public

Deborah G. Thrap

My Commission Expires:

4/6/2002

ATTACHMENT 1

PROPOSED REVISIONS TO THE MCGUIRE NUCLEAR STATION TECHNICAL SPECIFICATIONS

5.5 Programs and Manuals

5.5.11 Ventilation Filter Testing Program (VFTP) (continued)

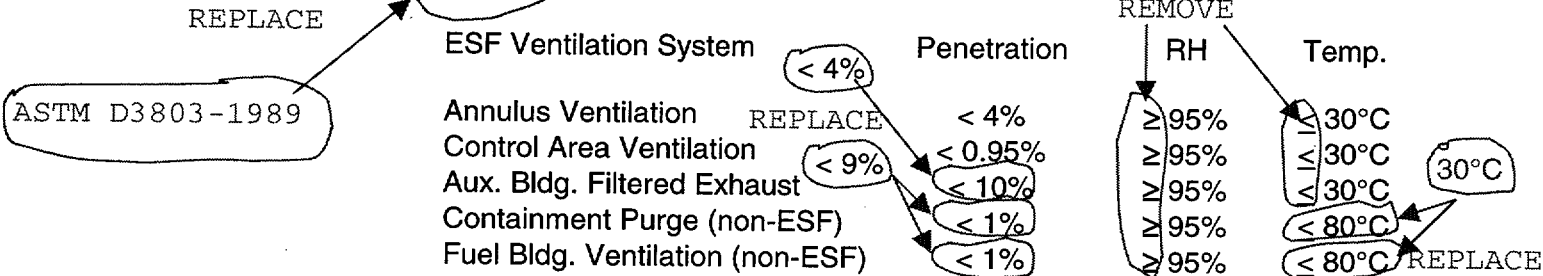
ESF Ventilation System	Penetration	Flowrate
Annulus Ventilation	< 1%	8000 cfm
Control Area Ventilation	< 0.05%	2000 cfm
Aux. Bldg. Filtered Exhaust (2 fans)(Unit 1)	< 1%	45,700 cfm
Aux. Bldg. Filtered Exhaust (2 fans)(Unit 2)	< 1%	40,500 cfm
Containment Purge (non-ESF) (2 fans)	< 1%	21,000 cfm
Fuel Bldg. Ventilation (non-ESF)	< 1%	35,000 cfm

b. Demonstrate for each of the ESF systems that an inplace test of the charcoal adsorber shows the following penetration and system bypass when tested in accordance with Regulatory Guide 1.52, Revision 2, and ANSI N510-1975 (N510-1980 for Auxiliary Building Filtered Exhaust) at the flowrate specified below $\pm 10\%$.

ESF Ventilation System	Penetration	Flowrate
Annulus Ventilation	< 1%	8000 cfm
Control Area Ventilation	< 0.05%	2000 cfm
Aux. Bldg. Filtered Exhaust (2 fans)(Unit 1)	< 1%	45,700 cfm
Aux. Bldg. Filtered Exhaust (2 fans)(Unit 2)	< 1%	40,500 cfm
Containment Purge (non-ESF) (2 fans)	< 1%	21,000 cfm
Fuel Bldg. Ventilation (non-ESF)	< 1%	35,000 cfm

c. Demonstrate for each of the ESF systems that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, shows the methyl iodide penetration less than the value specified below when tested in accordance with ASTM D3803-1979 (ASTM D3803-1989 for Annulus and Control Area Systems) at the temperature and relative humidity (RH) specified below.

ESF Ventilation System	Penetration	RH	Temp.
Annulus Ventilation	< 4%	$\geq 95\%$	$\leq 30^\circ\text{C}$
Control Area Ventilation	< 0.95%	$\geq 95\%$	$\leq 30^\circ\text{C}$
Aux. Bldg. Filtered Exhaust	< 10%	$\geq 95\%$	$\leq 30^\circ\text{C}$
Containment Purge (non-ESF)	< 1%	$\geq 95\%$	< 80°C
Fuel Bldg. Ventilation (non-ESF)	< 1%	$\geq 95\%$	< 80°C



d. Demonstrate for each of the ESF systems that the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers is less than the value specified below when tested in accordance with Regulatory Guide 1.52, Revision 2, and ANSI N510-1975 at the flowrate specified below $\pm 10\%$.

(continued)

ATTACHMENT 2

**REVISED MCGUIRE NUCLEAR
STATION TECHNICAL
SPECIFICATIONS**

5.5 Programs and Manuals

5.5.11 Ventilation Filter Testing Program (VFTP) (continued)

ESF Ventilation System	Penetration	Flowrate
Annulus Ventilation	< 1%	8000 cfm
Control Area Ventilation	< 0.05%	2000 cfm
Aux. Bldg. Filtered Exhaust (2 fans)(Unit 1)	< 1%	45,700 cfm
Aux. Bldg. Filtered Exhaust (2 fans)(Unit 2)	< 1%	40,500 cfm
Containment Purge (non-ESF) (2 fans)	< 1%	21,000 cfm
Fuel Bldg. Ventilation (non-ESF)	< 1%	35,000 cfm

- b. Demonstrate for each of the ESF systems that an inplace test of the charcoal adsorber shows the following penetration and system bypass when tested in accordance with Regulatory Guide 1.52, Revision 2, and ANSI N510-1975 (N510-1980 for Auxiliary Building Filtered Exhaust) at the flowrate specified below $\pm 10\%$.

ESF Ventilation System	Penetration	Flowrate
Annulus Ventilation	< 1%	8000 cfm
Control Area Ventilation	< 0.05%	2000 cfm
Aux. Bldg. Filtered Exhaust (2 fans)(Unit 1)	< 1%	45,700 cfm
Aux. Bldg. Filtered Exhaust (2 fans)(Unit 2)	< 1%	40,500 cfm
Containment Purge (non-ESF) (2 fans)	< 1%	21,000 cfm
Fuel Bldg. Ventilation (non-ESF)	< 1%	35,000 cfm

- c. Demonstrate for each of the ESF systems that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, shows the methyl iodide penetration less than the value specified below when tested in accordance with ASTM D3803-1989 at the temperature and relative humidity (RH) specified below.

ESF Ventilation System	Penetration	RH	Temp.
Annulus Ventilation	< 4%	95%	30°C
Control Area Ventilation	< 0.95%	95%	30°C
Aux. Bldg. Filtered Exhaust	< 4%	95%	30°C
Containment Purge (non-ESF)	< 9%	95%	30°C
Fuel Bldg. Ventilation (non-ESF)	< 9%	95%	30°C

- d. Demonstrate for each of the ESF systems that the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers is less than the value specified below when tested in accordance with Regulatory Guide 1.52, Revision 2, and ANSI N510-1975 at the flowrate specified below $\pm 10\%$.

(continued)

ATTACHMENT 3

DESCRIPTION OF PROPOSED CHANGES AND TECHNICAL JUSTIFICATION

Background

10CFR50, Appendix A, General Design Criteria (GDC) 19, 41, 42, 43, and 61 provide requirements for ensuring that offsite and control room operator doses are maintained with the limits of 10CFR100, Subpart A and 10CFR50, Appendix A, GDC 19. NRC Regulatory Guide 1.52, Revision 2 - "Design, Testing, And Maintenance Criteria For Post Accident Engineered-Safety-Feature Atmosphere Cleanup System Air Filtration And Adsorption Units Of Light-Water-Cooled Nuclear Power Plants" presents methods acceptable to the NRC staff for implementing the Commission's regulations in 10CFR50, Appendix A, with regard to design, testing, and maintenance criteria for air filtration and adsorption units of engineered-safety-feature (ESF) atmosphere cleanup systems in light-water-cooled nuclear power plants. The Auxiliary Building Filtered Ventilation Exhaust (VA) System, Containment Purge Ventilation (VP) System, and the Fuel Handling Building Ventilation (VF) System at McGuire are designed to satisfy the guidelines provided in Regulatory Guide 1.52, Revision 2.

The VA system (ESF system) creates a negative pressure in the Emergency Core Cooling system (ECCS) pump room areas and provides filtration for the ECCS pump room areas under post Loss Of Coolant Accident (LOCA) conditions. Credit is taken for the filtering of ECCS leakage using the VA charcoal filters in postulating control room and offsite dose consequences when evaluating compliance with the requirements of 10CFR100, Subpart A.

The purpose of the VP system (non-ESF system) is to reduce the airborne radioactivity levels in containment by purging the upper containment atmosphere to the environment via the unit vent during periods of sustained personnel access (including refueling). This system also has the capacity to purge lower containment and the in-core instrumentation room atmosphere to the unit vent during refueling when periods of personnel access are required. Credit is taken in the offsite dose calculation for the VP charcoal filters in maintaining offsite dose within the limits of 10CFR100, Subpart A, during a postulated fuel handling accident.

The VF system (non-ESF system) serves to control airborne radioactivity in the fuel pool areas during normal operation, anticipated operational transients, and following postulated fuel handling accidents. Credit is taken in the offsite dose calculation for the VF system being operable during a postulated fuel handling accident and maintaining offsite dose within the limits of 10CFR100, Subpart A.

Proposed Changes

In accordance with the requirements of 10CFR50.90 and 10CFR50.4, Duke Energy Corporation (DEC) proposes to revise the McGuire Nuclear Station Technical Specifications as stated below. The changes proposed by DEC in this License Amendment Request (LAR) are submitted in response to Generic Letter (GL) 99-02. That GL provided the NRC accepted protocol for testing of activated charcoal filters used in ESF ventilation systems. Note that GL 99-02 indicates that it is only applicable to ESF related ventilation systems. However, two non-ESF ventilation systems at McGuire, VP and VF, are designed to meet the guidance provided in Regulatory Guide 1.52, Revision 2. Consequently, these two non-ESF systems will be included in the scope of the proposed changes.

The proposed changes are as follows:

1. The first paragraph of Technical Specification 5.5.11, Section c, would be revised to remove the phrase

"..tested in accordance with ASTM D3803-1979 (ASTM D3803-1989 for Annulus and Control Area Systems) at the temperature and relative humidity (RH) specified below."

and replace it with the phrase

"..tested in accordance with ASTM D3803-1989 at the temperature and relative humidity (RH) specified below."

2. The penetration value shown in Technical Specification 5.5.11, Section c, for the VA, VP, and VF systems would be revised to < 4%, < 9%, and < 9%, respectively.
3. The test temperature and relative humidity for the systems shown in Technical Specification 5.5.11, Section c, would be revised to 30°C and 95%, respectively.

Note that GL 99-02 indicated that any Technical Specification changes submitted should specify the face velocity of any affected system that has a face velocity greater than 110% of 0.203 m/s (40 ft/min). None of the systems at McGuire for which GL 99-02 is applicable have a face value in excess of 110% of 0.203 m/s (40 ft/min).

Basis for Proposed Changes

A) Proposed Change #1

GL 99-02 alerted addressees that the NRC had determined that testing nuclear-grade activated charcoal to standards other than ASTM D3803-1989 does not provide assurance for complying with the dose limits of 10CFR50, Appendix A, GDC 19 and 10CFR100, Subpart A. As a result, by December 1, 1999, licensees whose Technical Specifications do not reference this standard were to either amend their Technical Specifications to reference ASTM D3803-1989 or propose an alternative test protocol. In the interim, the NRC indicated in GL 99-02 that it would exercise enforcement discretion for those plants which utilize protocol other than ASTM D3803-1989 when performing Technical Specification required testing of charcoal filters.

Section c of McGuire Technical Specification 5.5.11 - "Ventilation Filter Testing Program" provides the requirements for testing charcoal filters in ventilation systems designed as per the guidance provided in Regulatory Guide 1.52, Revision 2. At present, Technical Specification 5.5.11, Section c, references ASTM D3803-1979 as the protocol to be used when performing the Technical Specification required testing of the VA, VP, and VF charcoal filters. Prior to issuance of GL 99-02, the test protocol specified in ASTM D3803-1979 was judged as acceptable for meeting the guidance provided in NRC Regulatory Guide 1.52, Revision 2, related to testing of the charcoal filters. However, as requested by GL 99-02, Proposed Change #1 would revise Technical Specification 5.5.11, Section c, to reference ASTM D3803-1989 as the protocol to be used for Technical Specification required testing of activated charcoal filters used in the VA, VP, and VF systems. Upon implementation of Proposed Change #1, all Technical Specification 5.5.11, section c, related testing will reference ASTM D3803-1989.

B) Proposed Change #2

GL 99-02 states that licensees who revise their Technical Specifications to reference ASTM D3803-1989 as the test protocol for charcoal filters will be able to use a safety factor as low as 2 when determining the acceptance criteria for charcoal filter efficiency assumed in their analyses of offsite and control room operator doses following design-basis accidents. The basis for this allowance is the safety factor built in to the ASTM D3803-1989 acceptance criteria and the improved accuracy of the results obtained using that protocol.

McGuire intends to revise the acceptance criteria for VA, VP, and VF charcoal filter efficiencies assumed in the McGuire analyses of offsite and control room operator doses following design-basis accidents to 90%, 80%, and 80%, respectively. Using the safety factor of 2 allowed by GL 99-02 and the in-place testing penetration and system bypass requirement of 1% for the VA, VP, and VF systems shown in Technical Specification 5.5.11, Section b., the charcoal adsorber maximum methyl iodide penetration shown in Technical Specification 5.5.11, Section c, for the VA, VP, and VF systems must be revised as per Proposed Change #2 (to < 4%, < 9%, and < 9%, respectively) to allow the intended revision of the filter efficiency acceptance criteria. Note that the above efficiency changes will not result in any degradation in the ability of the affected filters to perform their design function.

Note that this LAR will not revise the maximum methyl iodide penetration of the Annulus Ventilation System (VE) and the Control Area Ventilation System (VC) charcoal filters specified in Technical Specification 5.5.11, Section c, since there are no plans to revise the acceptance criteria for the VE and VC charcoal filter efficiencies assumed in the McGuire offsite and control room operator dose analyses. Note that any reduction in these efficiencies would not allow McGuire to meet the offsite and control room operator dose requirements of 10CFR100, Subpart A and 10CFR50, Appendix A, GDC 19. In addition, this LAR will not reduce these maximum penetration values to accommodate any increase in the VE and VC safety factor used for determining filter efficiency acceptance criteria from the current value of 1 to the minimum safety factor of 2 suggested in GL 99-02. The current maximum methyl iodide penetration values specified in Technical Specification 5.5.11, Section c, which correlate to the current safety factor of 1 used for the VE and VC system were approved by an NRC in a Safety Evaluation Report (SER) dated July 15, 1991 issued in response to McGuire Technical Specification Amendments 122 and 104 (TAC Nos 80129 and 80130). As stated in that SER, there are conservatisms in the ASTM D3803-1989 test protocol. In addition, that SER noted the availability of heaters in the VE and VC systems to reduce humidity and improve filter efficiencies. Based upon the SER's findings, reductions in the maximum allowed VE and VC charcoal filter methyl iodide penetration to accommodate a safety factor of 2 would result in excessive change out of these charcoal filters without any significant corresponding increase in the health and safety of the public.

D. Proposed Change #3

ASTM D3803-1989 requires that charcoal testing be performed at 30°C and 95% relative humidity (+/- the temperature and relative humidity tolerances allowed by that standard). As stated in GL

99-02, testing performed at 30°C yields results that give a realistic assessment of the capability of the charcoal to ensure that the offsite and control room operator doses are maintained within the limits of 10CFR100, Subpart A and 10CFR50, Appendix A, GDC 19. Testing at temperatures other than 30°C could produce results that cannot be repeated or that overestimate the actual iodine removal capability of the charcoal. ASTM D3803-1989 requires that charcoal testing be performed at 95% relative humidity if licensees do not take credit for humidity control in their ventilation systems. McGuire does not take credit for humidity control.

At present, Technical Specification 5.5.11, Section c, indicates that the charcoal filters in the VE, VC, and the VA system shall be tested at $< 30^{\circ}\text{C}$, the VP and VF systems shall be tested at a temperature of $< 80^{\circ}\text{C}$, and all of these systems will be tested at a relative humidity of $\geq 95\%$. Proposed Change #3 would ensure that Technical Specification 5.5.11 complies with the test temperature and test relative humidity requirements of ASTM D3803-1989. This will ensure that the required Technical Specification testing of charcoal filters in those McGuire ventilation systems designed to meet the guidelines provided in Regulatory Guide 1.52, Revision 2, is performed at temperature and humidity conditions that will provide an accurate assessment of the charcoal's capability to ensure that offsite and control room operator doses are maintained with the limits of 10CFR100, Subpart A and 10CFR50, Appendix A, GDC 19.

Note that, as per GL 99-02, the proposed revisions in the temperature and relative humidity requirements for the Technical Specification 5.5.11, Section c, related ventilation systems do not incorporate inequalities. However, any test results will be judged acceptable by McGuire if testing was performed in accordance with the requirements of ASTM D3803-1989 and the test temperature and relative humidity are 30°C and 95% respectively, plus or minus the tolerances allowed by that standard.

Summary

The revisions to the McGuire Technical Specifications as shown in Proposed Changes #1, #2, and #3 would ensure that the McGuire Technical Specifications, which provide the test requirements for charcoal filters in ventilation systems designed to meet the guidance provided in Regulatory Guide 1.52, Revision 2, are in compliance with the requirements of ASTM D3803-1989. This will ensure that the Technical Specification related charcoal filters in ESF and non-ESF ventilation systems at McGuire are capable of maintaining offsite and control room operator dose within the limits of 10CFR100, Subpart A and 10CFR50, Appendix A, GDC 19.

99-02, testing performed at 30°C yields results that give a realistic assessment of the capability of the charcoal to ensure that the offsite and control room operator doses are maintained within the limits of 10CFR100, Subpart A and 10CFR50, Appendix A, GDC 19. Testing at temperatures other than 30°C could produce results that cannot be repeated or that overestimate the actual iodine removal capability of the charcoal. ASTM D3803-1989 requires that charcoal testing be performed at 95% relative humidity if licensees do not take credit for humidity control in their ventilation systems. McGuire does not take credit for humidity control.

At present, Technical Specification 5.5.11, Section c, indicates that the charcoal filters in the VE, VC, and the VA system shall be tested at $< 30^{\circ}\text{C}$, the VP and VF systems shall be tested at a temperature of $< 80^{\circ}\text{C}$, and all of these systems will be tested at a relative humidity of $\geq 95\%$. Proposed Change #3 would ensure that Technical Specification 5.5.11 complies with the test temperature and test relative humidity requirements of ASTM D3803-1989. This will ensure that the required Technical Specification testing of charcoal filters in those McGuire ventilation systems designed to meet the guidelines provided in Regulatory Guide 1.52, Revision 2, is performed at temperature and humidity conditions that will provide an accurate assessment of the charcoal's capability to ensure that offsite and control room operator doses are maintained with the limits of 10CFR100, Subpart A and 10CFR50, Appendix A, GDC 19.

Note that, as per GL 99-02, the proposed revisions in the temperature and relative humidity requirements for the Technical Specification 5.5.11, Section c, related ventilation systems do not incorporate inequalities. However, any test results at other than 30°C or 95% relative humidity will be judged acceptable by McGuire if testing was performed in accordance with the requirements of ASTM D3803-1989 and the results are plus or minus the tolerances allowed by that standard.

Summary

The revisions to the McGuire Technical Specifications as shown in Proposed Changes #1, #2, and #3 would ensure that the McGuire Technical Specifications, which provide the test requirements for charcoal filters in ventilation systems designed to meet the guidance provided in Regulatory Guide 1.52, Revision 2, are in compliance with the requirements of ASTM D3803-1989. This will ensure that these charcoal filters are capable of maintaining offsite and control room operator dose within the limits of 10CFR100, Subpart A and 10CFR50, Appendix A, GDC 19.

ATTACHMENT 4

NO SIGNIFICANT HAZARDS CONSIDERATIONS

No Significant Hazards Considerations:

In accordance with the criteria set forth in 10 CFR 50.91 and 50.92, McGuire Nuclear Station has evaluated this proposed Technical Specification change and determined it does not represent a significant hazards consideration. The following is provided in support of this conclusion.

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

No. The proposed changes will ensure that the Technical Specification 5.5.11, Section c, required testing of charcoal filters in McGuire ventilation systems designed to meet the guidance provided in Regulatory Guide 1.52, Revision 2, are performed as per ASTM D3803-1989. This will ensure that these filters are capable of performing their design function to maintain offsite and control room operator doses within the limits of 10CFR100, Subpart A and 10CFR50, Appendix A, GDC 19, following a LOCA or a postulated fuel handling accident. Consequently, the proposed changes only deal with the performance of these systems during an accident and have no impact on accident probabilities. In addition, since the proposed changes help ensure the capability of the subject ventilation systems to perform their design function, there will be no reduction in the ability of these systems to minimize the consequences of a previously evaluated accident.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

No. The proposed changes only help ensure the performance of the subject ventilation systems during an accident and have no impact on accident possibilities. No changes are being made to actual plant hardware or the way in which the plant is being operated. Therefore, no new accident causal mechanisms will be generated. Consequently, plant accident analyses will not be affected by these changes.

3. Does this change involve a significant reduction in a margin of safety?

No. Margin of safety is related to the confidence in the ability of the fission product barriers to perform their design functions during and following accident conditions. These barriers include the fuel cladding, the reactor coolant system, and the containment system. The performance of these barriers will not be degraded by the proposed changes. In addition, the proposed changes to the maximum methyl iodide requirements to accommodate planned changes in filter efficiencies will not result in any degradation in the capability of the affected charcoal filters to

perform their design function. As a result of the above, plant safety analyses will not be affected by the changes proposed in this LAR.

ATTACHMENT 5

**ENVIRONMENTAL IMPACT
ASSESSMENT**

Environmental Impact Assessment:

The proposed Technical Specification amendment has been reviewed against the criteria of 10 CFR 51.22 for environmental considerations. The proposed amendment does not involve a significant hazards consideration, nor increase the types and amounts of effluents that may be released offsite, nor increase individual or cumulative occupational radiation exposures. Therefore, the proposed amendment meets the criteria given in 10 CFR 51.22(c)(9) for a categorical exclusion from the requirement for an Environmental Impact Assessment.