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U. S. Nuclear Regulatory Commission  
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Subject: Removal of Safety Injection on Low Steam Line Pressure

Reference: McGuire Nuclear Station  
Docket Numbers 50-369, 50-370  
License Amendments 182 and 164  
(TAC No. MA99882 and MA9883)

Catawba Nuclear Station  
Docket Numbers 50-413, 50-414  
License Amendments 158 and 150  
(TAC No. M97538 and M97539)

The Nuclear Regulatory Commission (NRC) issued the above referenced License Amendments for Catawba Nuclear Station on April 3, 1997 and for McGuire Nuclear Station on September 22, 1998. The subject amendments were associated with removal of safety injection on low steam line pressure at McGuire Nuclear Station. The amendments relied in part, on information in a Westinghouse Topical Report "Secondary Side Safety Injection Function Deletion Modification"<sup>1</sup>.

These amendments deleted all of the safety injection functions associated with low steam line pressure, except for Steam Line Isolation;<sup>2</sup> After implementation, Duke engineering staff identified the removal of the reactor trip associated with these amendments as a potential condition adverse to quality.<sup>3</sup> In resolving this issue, Duke

<sup>1</sup> WCAP 12762 December 1990 Sechrist et al.

<sup>2</sup> See McGuire Page 3/4 3-33 Markup, Amendment Request Barron to USNRC October 6, 1997  
See Catawba Page 3/4 3-40 Markup, Amendment Request Tuckman to USNRC January 3, 1997

<sup>3</sup> Corrective Action Program Entry PIP M-99-03102  
Corrective Action Program Entry PIP C-99-2754

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engineering staff reviewed postulated plant transients with a main steam isolation in the absence of a reactor trip.

A review was conducted of all design basis accidents to evaluate the potential effect of steam line isolation prior to reactor trip. This review verified that a safety injection and subsequent reactor trip on low steam line pressure are not credited in any design basis accident analyses. A steam line isolation prior to a reactor trip is not a bounding design basis accident and all accident analysis acceptance criteria are met. Neither the Westinghouse report nor the NRC Safety Evaluation Report address removal of the reactor trip as part of this change.

The Technical Specification change package provided by Duke, in the amendment request, indicates removal of the reactor trip on low steam line pressure safety injection.<sup>2</sup> However, there is no explanatory description in the supporting amendment text highlighting removal of the reactor trip. Duke is providing this letter to provide further clarification as to the specific implementation of this change at McGuire. Duke is not requesting any NRC action in response to this letter.

This issue has been discussed with the Senior Resident Inspector at McGuire Nuclear Station. Please contact Julius Bryant (704 875 4162, [jwbryant@duke-energy.com](mailto:jwbryant@duke-energy.com)) or Mike Cash (704 875 4117, [mtcash@duke-energy.com](mailto:mtcash@duke-energy.com)) for questions regarding this issue.



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