

ATTACHMENT I

AMENDMENT DESCRIPTION, TECHNICAL DISCUSSION, and SUMMARY OF PROPOSED CHANGES

Duke Power Company
McGuire Nuclear Station
Catawba Nuclear Station
Oconee Nuclear Station

Amendment Description

The purpose of these proposed Technical Specifications amendments for McGuire, Catawba, and Oconee Nuclear Stations is to implement the major changes described below.

1. Under "Technical Review and Control", the proposed amendments remove the specific assignment of responsibilities for the review, distribution, and approval activities contained in the Technical Review and Control Section of each stations' Technical Specifications. The proposed specifications state that these activities will be performed by a knowledgeable individual/organization. Approval of the affected documents is to be at the appropriate manager/superintendent level as specified in Duke administrative controls.
2. The requested amendments move the review of proposed changes in the stations' Technical Specifications and Operating Licenses by the Duke Nuclear Safety Review Board to SLC 16.13-2 and changes the wording of the requirements covering NSRB meeting frequency. The Oconee Technical Specifications covering the NSRB are being rewritten to be consistent with McGuire and Catawba.
3. Under "Procedures and Programs/Station Operating Procedures", the proposed amendments add Technical Review and Control Program implementation and Plant Operations Review Committee (PORC) implementation to the list of required procedures and programs for each nuclear station.
4. Under "Technical Review and Control", "Record Retention/Station Operating Records", and "Procedures and Programs" the proposed amendments change or clarify certain Technical Specification administrative requirements covering identified activities.

U. S. NRC
January 12, 1995
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M. S. Tuckman, being duly sworn, states that he is Senior Vice President of Duke Power Company; that he is authorized on the part of said company to sign and file with the U. S. Nuclear Regulatory Commission these revisions to the McGuire Nuclear Station License Nos. NPF-9 and NPF-17, Oconee Nuclear Station License Nos. NPF-38, NPF-47 and NPF-55, and Catawba Nuclear Station License Nos. NPF-35 and NPF-52; and, that all statements and matters set forth therein are true and correct to the best of his knowledge.

M. S. Tuckman
M. S. Tuckman, Senior Vice President

Subscribed and sworn to before me this date: January 12, 1995

Mary P. Delms
Notary Public

My Commission Expires:

Jan 22, 1996

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5. For Oconee only, under "Station Operating Procedures", the proposed amendment revises the Technical Specification requirements covering the review and approval of station procedures and temporary procedure changes such that these are now consistent with the corresponding requirements for McGuire and Catawba.

Where appropriate, it is a goal of these proposed amendments to provide consistency among the three Duke nuclear stations in the activities covered by the affected Technical Specifications. The major provisions of the requested Technical Specification changes are discussed in the subsequent paragraphs. The details of the proposed changes are shown in the Detailed Summary of the Requested Changes and are marked on the affected Technical Specifications pages contained in Attachments IV, V, and VI for the respective nuclear station.

Technical Discussion

The bases/justification for these proposed changes are provided below.

1. Under "Technical Review and Control", the proposed amendments remove the specific assignment of responsibilities for the review, distribution, and approval activities contained in the Technical Review and Control Section of each stations' Technical Specifications. The proposed specifications state that these activities will be performed by a knowledgeable individual/organization. Approval of the affected documents is to be at the appropriate manager/superintendent level as specified in Duke administrative controls.

Duke is proposing to remove the specific assignment of responsibilities for the review, distribution, and approval activities contained in the Technical Review and Control Sections. Alternately, it is proposed to place these review, distribution, and approval activities in internal Duke administrative controls. The programmatic controls for the Technical Review and Control Program are to be contained in a Duke Selected Licensee Commitment (SLC). The combined SLCs form Chapter 16 of each nuclear stations' Final Safety Analysis Report and are controlled under the provisions of 10CFR50.59. The SLCs have historically been used as the means for controlling significant items that have been removed from the Technical Specifications. Duke feels the details of the Technical Review and Control Program implementation will be adequately controlled in the SLCs. Locating these controls in the

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SLCs will allow timely revisions to be made in response to any changing needs of the nuclear sites by utilizing the provisions of 10CFR50.59. Additionally, the SLC location will help reduce or eliminate the necessity of processing lengthy and resource intensive Technical Specifications amendments related to the Technical Review and Control Program. A copy of SLC 16.13-2, TECHNICAL REVIEW AND CONTROL, is included in Attachment VII of this amendment package.

Duke feels that the contents of the proposed new Technical Specifications will be consistent with the guidance contained in the Standardized Technical Specifications and is also similar in the approach taken by other utilities in writing the "Review and Control" sections of nuclear stations' Technical Specifications. Further, it is believed there will be no decrease in the level of quality given to the review and approval activities covered by the affected technical specifications. The personnel performing the covered reviews and approvals will continue to meet the same qualifications requirements of ANSI N18.1-1971 as required by Duke's Quality Assurance Program (Duke Power Topical Report, Duke-1-A) as approved by the NRC.

The present provisions of the Duke Qualified Reviewer Program applicable to the review of station procedures and modifications are not affected by this proposed amendment. The technical specifications applicable to these review activities are not being changed. Only the future reviews performed by the PORC (described in detail in Item 3 below) and the General Manager, Environmental Services (for McGuire and Oconee only) are being reassigned by the provisions of these proposed amendments. These reassignments are contained in SLC 16.13-2. An administrative change is being made to replace the term "qualified" (as presently used to designate individual/organization or group) with "knowledgeable" to avoid confusion with the Duke Qualified Reviewer Program.

2. **The requested amendments move the review of proposed changes in the stations' Technical Specifications and Operating Licenses by the Duke Nuclear Safety Review Board to SLC 16.13-2 and changes the wording of the requirements covering NSRB meeting frequency. The Oconee Technical Specifications covering the NSRB are being rewritten to be consistent with McGuire and Catawba.**

Duke is proposing to move the requirements covering the NSRB review of proposed changes to the stations' Technical Specifications and Operating Licenses to SLC 16.13-2. The NSRB will continue to review all proposed changes to the stations' Technical Specifications and Operating Licenses consistent with current practice. However, Duke feels that relocating these requirements

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will allow organizational flexibility in the future while maintaining adequate controls under the provisions of 10CFR50.59.

The requested amendment proposes to change the requirements covering the meeting frequency of the NSRB. As currently written, the Technical Specifications require the NSRB to meet once every six months. It is being proposed to change this requirement to twice per year, consistent with the wording of the applicable standard ((ANSI N18.7-1976/ANS-3.2). Duke feels this change will allow additional flexibility in scheduling future NSRB meetings, thereby reducing the administrative burden on the three nuclear sites.

For Oconee Nuclear Station, a rewritten portion of Section 6.1.3, "Nuclear Safety Review Board" is being proposed. These sections are being rewritten to be consistent with the corresponding McGuire and Catawba Technical Specifications.

3. **The proposed amendments add Technical Review and Control Program implementation and Plant Operations Review Committee implementation to the list of required station procedures and programs.**

The addition of "Technical Review and Control Program implementation" to the list of required station procedures and programs is being proposed to contain the specific requirements removed from the Technical Specifications under Item 1 above. Duke will implement the Technical Review and Control Program at each nuclear site by means of approved procedures/programs. The Duke document which will be utilized for this implementation is SLC 16.13-2 and it is included with this amendment package as part of Attachment VII.

The addition of "PORC implementation" to the list of required station procedures and programs is being proposed to contain the administrative controls for the Plant Operations Review Committee. This addition to the stations' Technical Specifications will require that procedures/programs be developed for PORC implementation. Duke will implement the Plant Operations Review Committee at each nuclear site by means of approved procedures/programs. The Duke document which will be utilized for this implementation is SLC 16.13-3, PLANT OPERATIONS REVIEW COMMITTEE and it is also included with this amendment package as part of Attachment VII.

Duke Power feels the establishment of a PORC at each nuclear site will be an enhancement to the review process performed for significant operational activities affecting its three nuclear stations. The major points of consideration leading to the

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establishment of a PORC at the Duke nuclear sites are:

- The 1991 reorganization of the Duke nuclear sites changed the decision making process utilized to address issues affecting the nuclear plants. The Station Manager no longer has line responsibility for the functional areas of Engineering and Safety Assurance. Although the reorganization better distributed the management burden of the nuclear sites' functional units, the dynamics of the decision making process were also affected. The PORC will provide the future structure to formally assemble the personnel from the functional units that are important to the decision making process on a day-to-day basis.
 - The nuclear power industry has recently been emphasizing increased management review and oversight of significant nuclear safety matters, as illustrated by INPO SOER-91-01. The PORC will provide the organizational structure to ensure increased management involvement in a quality manner.
 - Duke has noted other companies' success utilizing a PORC structure. It is management's intention to incorporate proven industry good practices into the Duke nuclear program.
4. **The proposed amendments change or clarify certain technical specification requirements covering technical review and control activities, records retention, or procedures and programs requirements.**

For McGuire and Catawba Nuclear Stations, an administrative change is being proposed which replaces the term ODCM (in Technical Specification 6.8.4 f 1 only) with Offsite Dose Calculation Manual (ODCM). This change provides an initial definition for the term ODCM in the Technical Specifications.

For Oconee Nuclear Station, reviews of changes to the Offsite Dose Calculation Manual and the Process Control Program are being added to the list of permanent station records contained in Technical Specification 6.5.1.

For Oconee Nuclear Station, a rewritten Section 6.1.2, "Technical Review and Control" is being proposed. This new section is consistent with McGuire and Catawba Technical Specifications and includes the changes proposed in this amendment request.

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Additional administrative changes of a minor nature are also being requested for the Technical Review and Control Section. These changes are described in the Detailed Summary of the Proposed Technical Specifications Changes and are shown on the marked pages of the stations' Technical Specifications provided in Attachments IV, V, and VI.

Changes or clarifications are being proposed to the records retention requirements of each nuclear stations' Technical Specifications in order to ensure agreement with the proposed changes to the Technical Review and Control Section.

5. **For Oconee only, under Section 6.4, "Station Operating Procedures", the proposed amendment revises the Technical Specification requirements covering the review and approval of station procedures and temporary procedure changes such that these are now consistent with the corresponding requirements for McGuire and Catawba.**

An administrative change is being proposed to the Technical Specifications such that the Technical Specifications covering the review and approval of station procedures, procedure changes, and temporary changes to procedures, will be consistent with the corresponding McGuire and Catawba Technical Specifications. These procedure review and approval requirements are being moved from Section 6.1.2.1a, "Technical Review and Control Activities", to Section 6.4, "Station Operating Procedures", of the Oconee Technical Specifications.

Detail Summary of Proposed Technical Specifications Changes for McGuire Nuclear Station

Specification/Change:

- 6.5.1 Removes the specific assignment of responsibilities for the required review, approval, and distribution activities. Other changes within Specification 6.5.1 are listed below. Replaces qualified individual/organization or group with knowledgeable individual/organization.
- 6.5.1.1 Adds reference to Specifications 6.8.2 and 6.8.3 for procedures/procedure change approval
- 6.5.1.2 Renumbers this Specification to 6.5.1.4.
- 6.5.1.3 Renumbers this Specification to 6.5.1.2.

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- 6.5.1.4 Clarifies the referenced supervisory staff as being individuals assigned to the site. Renumbers this Specification to 6.5.1.3.
- 6.5.1.8 Deletes this Specification.
- 6.5.1.9 Deletes this Specification.
- 6.5.1.10 Renumbers this Specification to 6.5.1.8.
- 6.5.1.11 Renumbers this Specification to 6.5.1.9.
- 6.5.1.12 Renumbers this Specification to 6.5.1.10.
- 6.5.1.13 Revises references to previous specifications as appropriate. Renumbers this Specification to 6.5.1.11.
- 6.5.2.6 Changes NSRB meeting frequency from at least once per 6 months to at least twice per year.
- 6.5.2.7 Deletes the word "his".
- 6.5.2.8d Deletes the NSRB review of proposed changes in Technical Specifications or this Operating License.
- 6.5.2.8e Renumbers these specifications as needed because of the thru deletion of 6.5.2.8d.
- 6.5.2.8j
- 6.5.2.8j Revises the referenced specification as appropriate.
- 6.8.1.h Adds Technical Review and Control Program implementation to "Procedures and Programs". Renumbers the existing Technical Specification to 6.8.1.i.
- 6.8.1.i Renumbers this specification to 6.8.1.k
- 6.8.1.j Adds PORC implementation to "Procedures and Programs".
- 6.8.4 Changes ODCM to Offsite Dose Calculation
f 1) Manual (ODCM).
- 6.10.2.j Revises references to previous specifications as appropriate.

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Detail Summary of Proposed Technical Specifications Changes for Catawba Nuclear Station

Specification/Change:

- 6.5.1 Removes the specific assignment of responsibilities for the required review, approval, and distribution activities. Other individual changes within Specification 6.5.1 are listed below. Replaces qualified individual/organization or group with knowledgeable individual/organization.
- 6.5.1.1 Adds reference to Specifications 6.8.2 and 6.8.3 for procedures/procedure change approval
- 6.5.1.2 Renumbers this Specification to 6.5.1.4.
- 6.5.1.3 Renumbers this Specification to 6.5.1.2.
- 6.5.1.4 Clarifies the referenced supervisory staff as being individuals assigned to the site. Renumbers this Specification to 6.5.1.3.
- 6.5.1.8 Deletes this Specification.
- 6.5.1.9 Deletes this Specification.
- 6.5.1.10 Renumbers this Specification to 6.5.1.8.
- 6.5.1.11 Renumbers this Specification to 6.5.1.9.
- 6.5.1.12 Renumbers this Specification to 6.5.1.10.
- 6.5.1.13 Revises references to previous specifications as appropriate. Renumbers this Specification to 6.5.1.11.
- 6.5.2.6 Changes NSRB meeting frequency from at least once per 6 months to at least twice per year.
- 6.5.2.7 Deletes the word "his".
- 6.5.2.8d Deletes the NSRB review of proposed changes in Technical Specifications or this Operating License.
- 6.5.2.8e Renumbers these specifications as needed because of the thru deletion of 6.5.2.8d.
- 6.5.2.8j
- 6.5.2.8j Revises the referenced specification as appropriate..

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- 6.8.1.h Adds Technical Review and Control Program implementation to "Procedures and Programs". Renumbers the existing Technical Specification to 6.8.1.i.
- 6.8.1.i Renumbers this specification to 6.8.1.k
- 6.8.1.j Adds PORC implementation to "Procedures and Programs".
- 6.8.4 Changes ODCM to Offsite Dose Calculation
f 1) Manual (ODCM).
- 6.10.2.j Revises references to previous specifications as appropriate.

Detail Summary of Proposed Technical Specifications Changes for Oconee Nuclear Station

Specification/Change:

- 6.1.2 This technical specification section, which is entitled "Technical Review and Control" is being rewritten to be consistent with the corresponding specifications (Section 6.5.1 with proposed changes) for McGuire and Catawba.
- 6.1.3 A portion of this technical specification section, which is entitled "Nuclear Safety Review Board" is being rewritten to be consistent with the corresponding specifications (Section 6.5.2 with proposed changes) for McGuire and Catawba.
- 6.4.1 Adds Technical Review and Control Program implementation to "Station Operating Procedures" as Item o.
- 6.4.1 Adds Plant Operations Review Committee implementation to "Station Operating Procedures" as Item p.
- 6.4.2 This proposed new specification section contains requirements covering the review and approval of station procedures. This new section is consistent with the corresponding requirements (Technical Specification Section 6.8.2) for McGuire and Catawba. The current Section 6.4.2 is being renumbered as Section 6.4.4 and an editorial change is also being proposed.
- 6.4.3 This is a proposed new specification section which contains requirements covering the review and approval of temporary changes to station procedures. This new section is consistent with the corresponding requirements (Technical Specification Section 6.8.3) for McGuire and

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Catawba. The existing specification is being renumbered.

6.4.4 This specification is being renumbered.

6.4.5 This specification is being renumbered.

6.4.6 This specification is being renumbered.

6.4.7 This specification is being renumbered.

6.5.1 Records of reviews performed for changes made to the ODCM
and the Process Control Program are being added as
Item n.

Records of meetings of the NSRB and reports required by
Specification 6.1.2.1k are being added as Item o.

6.5.2i The requirements of this specification, which cover NSRB
records, are being moved to 6.5.1 (as item o) for
permanent retention.

6.5.2j This specification is being renumbered.

6.5.2k This specification is being renumbered.

6.5.2l This specification is being renumbered.

ATTACHMENT II

NO SIGNIFICANT HAZARDS ANALYSIS

Duke Power Company
McGuire Nuclear Station
Catawba Nuclear Station
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10 CFR 50.91 requires that the following be provided addressing whether the proposed amendment involves a significant hazards consideration as defined in 10 CFR 50.92. Standards for the determination that a significant hazards consideration is not involved are that the proposed amendment would NOT: 1) Involve a significant increase in the probability or consequences of an accident previously evaluated; 2) Create the possibility of a new or different kind of accident from any previously evaluated; or, 3) Involve a significant reduction in a margin of safety.

Standard #1. The proposed amendments will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The provisions of these proposed amendments concern administrative changes in the stations' Technical Specifications involving the Technical Review and Control, Procedures and Programs/Station Operating Procedures, and Records Retention/Station Operating Records portions of the Administrative Controls Section. The requested changes primarily affect review and control activities, but also include other administrative changes affecting the approval of station procedures (Oconee only), records retention, and definition of the term ODCM (McGuire and Oconee). The provisions of the proposed amendment primarily involve the relocation of existing Technical Specifications review, distribution, or approval requirements to internal Duke administrative controls. However, implementation of the proposed amendment does involve changes to several review/distribution activities. These review/distribution activities are primarily for: 1) Proposed changes to the stations' Technical Specifications, 2) Proposed tests and experiments which affect nuclear safety and are not addressed in the stations' FSAR or Technical Specifications, 3) Environmental radiological procedures, 4) Reportable events documentation and reports of violations of Technical Specifications, 5) Reports of special reviews and investigations, and 6) Reports of unplanned onsite releases of radiological material to the environs. Planned implementation of the proposed Technical Specifications amendments utilizing Selected Licensee Commitments will result in the above items being reviewed/received by a different organizational unit in the future. The organizational unit is to be either the recently initiated Plant Operations Review Committee (PORC) or the General Manager, Environmental Services. Personnel serving on the PORC, and the

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General Manager, Environmental Services will be qualified based upon education and experience to review the operational and technical considerations involved with the applicable items listed above. No required reviews are being eliminated by the requested amendments, only the organizational units responsible for performing the reviews will be changed. Future reviews of these items under the auspices of the PORC or the General Manager, Environmental Services will maintain a quality level equivalent to that being currently achieved by Duke's Qualified Reviewer Program, the Station Managers, or the Duke Nuclear Safety Review Board as applicable. Consequently, merely changing the organizational units performing future reviews, or making the additional administrative changes described above, results in no increase in the probability or consequences of an accident previously evaluated because the review function will continue to be conducted in an equivalent manner.

The implementing SLC will also permit proposed amendments to the stations' Technical Specifications and Operating Licenses to be approved for the Station Manager by a designee. However, this individual will occupy a position equivalent to, or higher, in the Duke organization as the Station Manager.

Additionally, the proposed changes do not directly impact the design or operation of any plant systems or components any more so than the review and approval processes currently being conducted in accordance with existing approved Technical Specifications.

Standard #2. The proposed amendments will not create the possibility of a new or different kind of accident from any previously evaluated.

The proposed changes are administrative in nature and primarily cover the review, distribution, and/or approval function performed for items identified in existing Technical Specifications. The quality level of the future reviews will not decrease and the ability of Duke to identify the possibility for the occurrence of new or different kinds of accidents prior to implementation will be maintained. Of specific interest in the consideration of Standard #2 is the review of proposed tests and experiments which affect station nuclear safety and are not addressed in the FSAR or Technical Specifications. The Technical Specifications required reviews of these tests and experiments are not being proposed for removal by these requested amendments. Only the organizational unit conducting the review of proposed tests and experiments is being changed by the requested amendments. The PORC, instead of the Station Manager, is being assigned the responsibility for

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conducting the reviews of proposed tests and experiments in the future. It is believed that the combined expertise of the PORC membership will enhance Duke's ability to identify potential situations which could possibly involve a new, or different, kind of accident.

Standard #3. The proposed amendments will not involve a significant reduction in any margin of safety.

The changes contained in the requested amendments are administrative in nature and do not impact the design capabilities or operation of any plant structures, systems, or components. There will be no reduction in margin of safety as a result of implementing these requested amendments. Impact upon margin of safety is a consideration primarily included in the 10CFR50.59 evaluation process conducted for station procedures, procedure changes, and nuclear station modifications. The 10CFR50.59 evaluation process is conducted under the auspices of the Duke Qualified Reviewer Program and is not affected by these requested amendments. The impact on margin of safety for future Technical Specifications and Operating License changes will be reviewed by the PORC, but these reviews will be equivalent in quality to the reviews presently conducted by the Qualified Reviewers.

ATTACHMENT III
ENVIRONMENTAL IMPACT ANALYSIS

Duke Power Company
McGuire Nuclear Station
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An evaluation of the requested amendments has been performed to determine if the regulatory criteria for categorical exclusion is applicable. Since the provisions of the requested amendments only involve changes to administrative procedures or requirements, in accordance with 10CFR51.22(c)(10)(ii) the requested amendments meet the requirements for categorical exclusion and the preparation of an Environmental Impact Statement is not required.