



Steven D. Capps
Vice President
McGuire Nuclear Station

Duke Energy
MG01VP | 12700 Hagers Ferry Road
Huntersville, NC 28078

o: 980.875.4805
f: 980.875.4809
Steven.Capps@duke-energy.com

May 5, 2016
Serial: MNS-16-020

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

10 CFR 50.90

Subject: Duke Energy Carolinas, LLC (Duke Energy)
McGuire Nuclear Station (MNS), Units 1 and 2
Docket Numbers 50-369 and 50-370
Renewed Facility Operating License Nos. NPF-9 and NPF-17
Removal of Superseded Technical Specification (TS) Requirements

Pursuant to Section 50.90 of Title 10 of the Code of Federal Regulations (10 CFR), Duke Energy herein submits a license amendment request (LAR) for the Renewed Facility Operating Licenses (FOL) and Technical Specifications (TS) for MNS to remove superseded TS requirements.

This LAR affects two separate MNS TSs. The LAR addresses the removal of a note which is no longer applicable from TS Table 3.3.2-1.6.f and the removal of an expired note from TS 3.8.1.

By letter dated September 12, 2013, Duke Energy submitted a LAR for MNS TS 3.3.2. The license amendment was needed for plant modifications which installed new plant equipment in support of NRC Order EA 12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond Design Basis External Events. Because the modifications were implemented on a staggered basis for each of the units, a temporary TS modification in the form of a note was implemented to allow the applicable TS requirements to be applicable or non-applicable, depending upon implementation status of the modification. The LAR contained a commitment for Duke Energy to submit a follow-up administrative LAR to delete the superseded temporary TS note within one year following implementation of the modification on the final unit. By letter dated August 27, 2014, the NRC issued a license amendment regarding the TS changes requested in the September 12, 2013, LAR. Implementation of the final modification was completed during the MNS Unit 2 End-Of-Cycle 23 refueling outage (Fall 2015). This LAR satisfies the MNS commitment to delete the TS note described in the September 12, 2013, LAR.

ADD1
NRR

By letter dated June 7, 2007, supplemented by letter dated June 8, 2007, Duke Energy submitted a one-time emergency TS change LAR for MNS TS 3.8.1. The license amendment was needed to support unanticipated repairs on the 1A Emergency Diesel Generator (EDG). The repairs covered by this amendment have been completed. This note expired on June 15, 2007 and is no longer applicable.

In accordance with Duke's administrative procedures and Quality Assurance Program, this LAR has been reviewed and approved by the MNS Plant Operations Review Committees.

Attachment 1 provides an evaluation of the changes proposed in this LAR. Attachment 2 provides a marked-up version of the affected TS 3.3.2 page. Attachment 3 provides a marked-up version of the affected TS 3.8.1 page. Reprinted (clean) TS pages will be provided to the NRC prior to issuance of the approved amendment.

This LAR contains no regulatory commitments.

Implementation of this proposed LAR will not impact the MNS Updated Final Safety Analysis Report (UFSAR).

Pursuant to 10 CFR 50.91, a copy of this LAR is being sent to the designated official of the State of North Carolina.

If you have any questions or require additional information, please contact George Murphy at (980) 875-5715.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 5, 2016.

Sincerely,



Steven D. Capps

Attachments:

1. Evaluation of the Proposed Changes
2. MNS Marked-Up TS 3.3.2 Page 14
3. MNS Marked-Up TS 3.8.1 Page 3

U.S. Nuclear Regulatory Commission
Page 3
May 5, 2016

cc:

C. Haney, Region II Administrator
U.S. Nuclear Regulatory Commission
Marquis One Tower
245 Peachtree Center Avenue NE, Suite 1200
Atlanta, Georgia 30303-1257

G. E. Miller, Project Manager (MNS)
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Mail Stop O-8 G9A
Rockville, MD 20852-2738

J. Zeiler
NRC Senior Resident Inspector
McGuire Nuclear Station

North Carolina Department of Health and Human Services
Division of Health Service Regulation
Radiation Protection Section
1645 Mail Service Center
Raleigh, NC 27699-1645

ATTACHMENT 1
EVALUATION OF PROPOSED AMENDMENT

- 1.0 SUMMARY DESCRIPTION
- 2.0 DETAILED DESCRIPTION
- 3.0 TECHNICAL EVALUATION
- 4.0 REGULATORY EVALUATION
 - 4.1 Applicable Regulatory Requirements/Criteria
 - 4.2 Significant Hazards Consideration
 - 4.3 Conclusions
- 5.0 ENVIRONMENTAL CONSIDERATIONS
- 6.0 REFERENCES

ATTACHMENT 1
EVALUATION OF PROPOSED AMENDMENT

1. SUMMARY DESCRIPTION

Pursuant to Section 50.90 of Title 10 of the Code of Federal Regulations (10 CFR), Duke Energy Carolinas, LLC (Duke Energy) herein submits a license amendment request (LAR) for the Renewed Facility Operating Licenses (FOLs) and Technical Specifications (TS) for McGuire Nuclear Station (MNS) to remove superseded TS requirements.

This LAR affects two separate MNS TSs. The LAR addresses the removal of Note (c) from TS Table 3.3.2-1.6.f which is no longer applicable and the removal of an expired note from TS 3.8.1.

By letter dated September 12, 2013, Duke Energy submitted a LAR for MNS TS 3.3.2. The license amendment was needed for plant modifications which installed new plant equipment in support of NRC Order EA 12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond Design Basis External Events. Because the modifications were implemented on a staggered basis for each of the units, a temporary TS modification in the form of a note was implemented to allow the applicable TS requirements to be applicable or non-applicable, depending upon implementation status of the modification. The LAR, as supplemented by a letter dated May 20, 2010, contained a commitment for Duke Energy to submit a follow-up administrative LAR to delete the superseded temporary TS note within one year following implementation of the modification on the final unit.

By letter dated August 27, 2014, the NRC issued a license amendment regarding the TS changes requested in the September 12, 2013, LAR. Implementation of the final modification was completed during the MNS Unit 2 End-Of-Cycle 23 refueling outage (Fall 2015). This LAR satisfies the MNS commitment to delete the superseded TS described in the September 12, 2013, LAR.

By letter dated June 7, 2007, supplemented by Duke Energy letter dated June 8, 2007, Duke Energy submitted a one-time emergency TS change LAR for MNS TS 3.8.1. The license amendment was needed to support unanticipated repairs on the 1A Emergency Diesel Generator (EDG). The repairs covered by this amendment have been completed. This note expired on June 15, 2007, and is no longer applicable.

2. DETAILED DESCRIPTION

The proposed changes to TS Table 3.3.2-1.6.f and TS 3.8.1 described below are administrative non-technical changes only.

The change to TS Table 3.3.2-1.6.f is consistent with the proposed changes in Duke Energy's September 12, 2013, LAR and the subject commitment in that LAR. In addition, this change is consistent with the change approved by the NRC in their SER issued on August 27, 2014. This proposed change supports the commitment to the NRC to delete the temporary TS Note (c) within one year following implementation of the modification on the final unit.

ATTACHMENT 1
EVALUATION OF PROPOSED AMENDMENT

The change to TS 3.8.1 is consistent with the proposed changes in Duke Energy's one-time emergency TS change LAR dated June 7, 2007. The 1A EDG repairs covered by this amendment have been completed. This note expired on June 15, 2007, and is no longer applicable.

Proposed Changes-McGuire:

TS Table 3.3.2-1. 6.f. Note (c) and the associated footnote will be deleted. This note allowed for unit staggered implementation of the license amendment based on the modification schedule. The note is no longer necessary since the modifications have been completed on both units and the license amendment is applicable on both units.

TS 3.8.1 Condition B Note identified by a single asterisk will be deleted. This note allowed the completion time for condition B.4 to be extended one time to a total of 10 days as part of the 1A EDG Jacket/Intercooler Water Pump Motor repair. The note expired June 15, 2007.

3. TECHNICAL EVALUATION

The proposed changes to TS Table 3.3.2-1.6.f and TS 3.8.1 described below are administrative non-technical changes only.

The proposed change to TS Table 3.3.2-1.6.f is an administrative non-technical change which removes a temporary TS note previously inserted as part of the MNS September 12, 2013, LAR. The temporary note, which accommodated the staggered implementation of the modifications on both MNS Units, is no longer necessary given that the modifications have been implemented on both units. Upon approval and implementation of the proposed changes, the MNS TSs will continue to reflect the changes justified in the Regulatory Evaluation associated with Duke Energy's September 12, 2013, LAR and approved by the NRC as part of their August 27, 2014, SER.

The proposed change to TS 3.8.1 Condition B Note identified by a single asterisk is also an administrative non-technical change which removes temporary TS requirements added as part of the MNS June 7, 2007, LAR. The note will be deleted.

The proposed changes implement administrative non-technical editorial changes.

Given the above, additional Technical Evaluation of the administrative non-technical changes proposed in this LAR is not necessary.

ATTACHMENT 1
EVALUATION OF PROPOSED AMENDMENT

4. REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

The proposed changes in this LAR are administrative and non-technical in nature. Upon approval and implementation of the proposed changes, the MNS TSs will continue to comply with the applicable regulatory requirements and criteria discussed in the Regulatory Evaluation associated with Duke Energy's September 12, 2013, and June 7, 2007, LARs which were approved by the NRC as part of their August 27, 2014, and June 8, 2007, SERs. Therefore, additional discussion of the applicable regulatory requirements and criteria is not required.

4.2 Significant Hazards Consideration

The proposed changes to TS Table 3.3.2-1.6.f and TS 3.8.1 described below are administrative non-technical changes only.

The change to TS Table 3.3.2-1.6.f is an administrative non-technical change only and is consistent with the commitment in Duke Energy's September 12, 2013, LAR. In addition, these changes are consistent with the changes approved by the NRC in their August 27, 2014, SER. The change supports the commitment made to the NRC in the LAR to delete the temporary TS note within one year after implementation of the modification on the final unit.

The removal of the expired TS 3.8.1 Condition B Note is also an administrative non-technical change which removes temporary TS requirements added as part of the MNS June 7, 2007, LAR.

Duke Energy has evaluated whether or not a significant hazard consideration is involved with the proposed changes by analyzing the three standards set forth in 10 CFR 50.92(c) as discussed below:

Criterion 1:

Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

This LAR proposes administrative non-technical changes only. These proposed changes do not adversely affect accident initiators or precursors nor alter the design assumptions, conditions, or configurations of the facility. The proposed changes do not alter or prevent the ability of structures, systems and components (SSCs) to perform their intended function to mitigate the consequences of an initiating event within the assumed acceptance limits.

Given the above discussion, it is concluded the proposed amendment does not significantly increase the probability or consequences of an accident previously evaluated.

ATTACHMENT 1
EVALUATION OF PROPOSED AMENDMENT

Criterion 2:

Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

This LAR proposes administrative non-technical changes only. The proposed changes will not alter the design requirements of any Structure, System or Component (SSC) or its function during accident conditions. No new or different accidents result from the proposed changes. The changes do not involve a physical alteration of the plant or any changes in methods governing normal plant operation. The changes do not alter assumptions made in the safety analysis.

Given the above discussion, it is concluded the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Criterion 3:

Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No.

This LAR proposes administrative non-technical changes only. The proposed changes do not alter the manner in which safety limits, limiting safety system settings or limiting conditions for operation are determined. The safety analysis acceptance criteria are not affected by these changes. The proposed changes will not result in plant operation in a configuration outside the design basis. The proposed changes do not adversely affect systems that respond to safely shutdown the plant and to maintain the plant in a safe shutdown condition.

Given the above discussion, it is concluded the proposed amendment does not involve a significant reduction in the margin of safety.

4.3 Conclusions

Based on the above, Duke Energy concludes that the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of no significant hazards consideration is justified.

ATTACHMENT 1
EVALUATION OF PROPOSED AMENDMENT

5. ENVIRONMENTAL CONSIDERATION

This LAR proposes administrative non-technical changes only. Duke Energy has determined that the proposed amendment does change requirements with respect to the installation or use of a facility component located within the restricted area, as defined by 10 CFR 20. Duke Energy has evaluated the proposed changes and has determined that they do not involve: (1) a significant hazards consideration, (2) a significant change in the types or a significant increase in the amounts of any effluents that may be released offsite, or (3) a significant increase in individual or cumulative occupational radiation exposures. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the proposed amendment.

6. REFERENCES

1. Duke Energy letter, dated September 12, 2013, License Amendment Request for a revision to Technical Specification 3.3.2 in support of NRC Order EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events", dated March 12, 2012, (Agency wide Documents Access and Management System (ADAMS) Accession No. ML13262A500)
2. NRC letter dated, August 27, 2014, "McGuire Nuclear Station, Units 1 and 2- Issuance of Amendments Regarding Technical Specification 3.3.2 in Support of Compliance with NRC Order EA-12-049 (TAC NOS. MF2741 and MF2742)", ADAMS Accession No. ML14211A403)
3. Duke Energy letter, dated June 7, 2007, supplemented by Duke Energy letter dated June 8, 2007, Emergency License Amendment Request for One-Time Limited Duration Extension of Allowed Outage Time for Unit 1A Emergency Diesel Generator (Agency wide Documents Access and Management System (ADAMS) Accession No. ML071590038), supplemented by Duke Energy letter dated June 8, 2007, ADAMS Accession No. ML071640098.
4. NRC letter dated June 8, 2007, McGuire Nuclear Station, Unit1 - Issuance of Emergency Amendment Regarding One-Time Extension of Emergency Diesel Generator Allowed Outage Time, (TAC No. MD5724) ADAMS Accession No. ML071570599.

Attachment 2

MNS Marked-Up TS 3.3.2 Page 14

Table 3.3.2-1 (page 5 of 6)
Engineered Safety Feature Actuation System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	NOMINAL TRIP SETPOINT
6. Auxiliary Feedwater (continued)						
e. Trip of all Main Feedwater Pumps	1,2	1 per MFW pump	K	SR 3.3.2.7 SR 3.3.2.9	NA	NA
f. Auxiliary Feedwater Pump Suction Transfer on Suction Pressure - Low (c)	1,2,3	2 per MDP, 4 per TDP	N,O	SR 3.3.2.7(a)(b) SR 3.3.2.8(a)(b) SR 3.3.2.9	≥ 6.5 psig ≥ 7.5 psig (2A MDP only)	7.0 psig 8.0 psig (2A MDP only)
7. Automatic Switchover to Containment Sump						
a. Refueling Water Storage Tank (RWST) Level - Low	1,2,3	3	P,S	SR 3.3.2.1 SR 3.3.2.3(a)(b) SR 3.3.2.8(a)(b) SR 3.3.2.9	≥ 92.3 inches	95 inches
Coincident with Safety Injection	Refer to Function 1 (Safety Injection) for all initiation functions and requirements.					

(continued)

(a) If the as-found channel setpoint is outside its predefined as-found tolerance, then the channel shall be evaluated to verify that it is functioning as required before returning the channel to service.

(b) The instrument channel setpoint shall be reset to a value that is within the as-left tolerance around the Nominal Trip Setpoint (NTSP) at the completion of the surveillance; otherwise, the channel shall be declared inoperable. Setpoints more conservative than the NTSP are acceptable provided that the as-found and as-left tolerances apply to the actual setpoint implemented in the Surveillance procedures (field setting) to confirm channel performance. The methodologies used to determine the as-found and the as-left tolerances are specified in the UFSAR.

~~(c) Prior to completion of the AC independent AFW pump suction transfer scheme modification on the respective Unit, the Allowable Value for this Function is ≥3 psig (≥4 psig 2A MDP only) and the Nominal Trip Setpoint for this Function is 3.5 psig (4.5 psig 2A MDP only).~~

NOTE 1: The Trip Setpoint for the Containment Pressure Control System start permissive/termination (SP/T) shall be ≥ 0.3 psig and ≤ 0.4 psig. The allowable value for the SP/T shall be ≥ 0.25 psig and ≤ 0.45 psig.

Attachment 3

MNS Marked-Up TS 3.8.1 Page 3

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	B.4 Restore DG to OPERABLE status.	72 hours * <u>AND</u> 6 days from discovery of failure to meet LCO *
C. Two offsite circuits inoperable.	C.1 Declare required feature(s) inoperable when its redundant required feature(s) is inoperable. <u>AND</u> C.2 Restore one offsite circuit to OPERABLE status.	12 hours from discovery of Condition C concurrent with inoperability of redundant required feature(s) 24 hours

(continued)

* For Unit 1 only, the Completion Time that the 1A EDG can be inoperable as specified by Required Action B.4 may be extended beyond the "72 hours and 6 days from discovery of failure to meet the LCO" up to a total of 10 days as part of the 1A EDG Jacket/Intercooler Water Pump Motor repair. Upon completion of the repair and restoration, this footnote is no longer applicable and will expire at 1741 hours on June 15, 2007