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**DUKE POWER**

April 24, 1990

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

Subject: Proposed Technical Specification Amendment for the Relocation of the Containment Penetration Conductor Overcurrent Protective Device Tables to the FSAR Selected Licensee Commitment Manual for:

McGuire Nuclear Station, Docket Nos. 50-369 and 50-370; and, Catawba Nuclear Station, Docket Nos. 50-413 and 50-414.

Gentlemen:

This letter contains proposed amendments to the Technical Specifications for McGuire Nuclear Station (Facility Operating License Nos. NPF-9 and NPF-17); and, Catawba Nuclear Station (Facility Operating License Nos. NPF-35 and NPF-52). This request involves relocating the Containment Penetration Conductor Overcurrent Protective Device Tables to the respective stations FSAR Chapter 16 Selected Licensee Commitment (SLC) Manual.

Attachment No. 1 contains the justification/technical discussion, no significant hazards analysis, and environmental impact analysis. The proposed changes to each station's Technical Specifications are identified in Attachment No. 2 for McGuire Nuclear Station and No. 3 for Catawba Nuclear Station. Attachments No. 4 for McGuire Nuclear Station and No. 5 for Catawba Nuclear Station provide the Containment Penetration Conductor Overcurrent Protective Device Tables as they would appear when relocated to each station's FSAR Chapter 16 SLC Manual.

We request that the proposed changes in this submittal be reviewed and approved by September 5, 1990. This date coincides with the scheduled refueling outage of McGuire Unit 2 and the implementation of several modifications that will require several new containment penetration conductor overcurrent protective devices to be added to the tables.

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

Very truly yours,

Hal B. Tucker

Attachments

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xc: W/All Attachments

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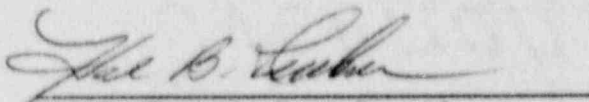
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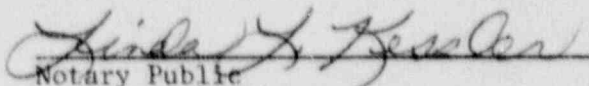
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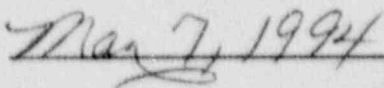
HAL B. TUCKER, being duly sworn, states that he is Vice President of Duke Power Company; that he is authorized on the part of said Company to sign and file with the U.S. Nuclear Regulatory Commission this revision to the McGuire Nuclear Station Technical Specifications, License Nos. NPF-9 and NPF-17; and the Catawba Nuclear Station Technical Specifications, Appendix A to 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.

  
Hal B. Tucker, Vice President

Subscribed and sworn to before me this twenty-fourth day of April 1990.

  
Notary Public

My Commission Expires:

  
May 7, 1994



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Attachment No. 1

McGuire, and Catawba Nuclear Stations  
Technical Discussion, No Significant Hazards Analysis, and  
Environmental Analysis

Justification/Technical Discussion

The purpose of the proposed revision is to relocate the McGuire and Catawba Containment Penetration Conductor Overcurrent Protection Device Tables to the McGuire and Catawba FSAR Chapter 16 Selected Licensee Commitment (SLC) Manuals. Currently, when a containment penetration conductor overcurrent protection device is deleted or added in the plant, a Nuclear Station Modification is required. As part of this requirement, a 10 CFR 50.59 evaluation is performed to determine if an unreviewed safety question is involved as a result of the proposed modification. Additionally, the deletion or addition of a containment penetration conductor overcurrent protection device requires prior NRC approval in the form of a Technical Specification (TS) revision to update the tables. The relocation of these tabular tables to another license document such as the FSAR Chapter 16 SLC Manual would allow Duke to make changes to the tabular table per a 10 CFR 50.59 evaluation. The relocation of these tables is also in keeping with the philosophy of industry/NRC TS improvement program.

This amendment request for the McGuire and Catawba Nuclear Stations will:

- ♦ Change TS 3/4.8.1 for McGuire Nuclear Station and 3/4.8.4 for Catawba Nuclear Station to reference FSAR Chapter 16 instead of TS Table 3.8-1a and 3.8-1b.
- ♦ Change TS 4.8.4.1 for McGuire Nuclear Station and 4.8.4 for Catawba Nuclear Station to reference FSAR Chapter 16 instead of TS Table 3.8-1a and 3.8-1b;
- ♦ Delete the Containment Penetration Conductor Overcurrent Penetration Device Tables from the McGuire and Catawba TSs and relocate them to the respective stations FSAR Chapter 16; and,

As previously stated, Duke proposes to relocate the Containment Penetration Conductor Overcurrent Protection Device Tables to the FSAR Chapter 16 SLC Manual for McGuire and Catawba Nuclear Stations. Currently, the McGuire FSAR Chapter 16 SLC Manual has been developed and implemented. The Catawba FSAR Chapter 16 SLC Manual has been developed and is in the process of being implemented. The latter will be implemented prior to the requested approval date of September 1990, (Approximately June 1990).



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Selected licensee commitments are defined as commitments to control important plant equipment and operating conditions, primarily derived from former station TSs. These commitments involve systems and components that are part of the licensing basis, as described in the FSAR, but are not of such a level of importance that the rigorous controls provided by the TSs are required. A selected licensee commitment typically includes the commitment (corresponding with the TS Limiting Condition of Operation), the applicability, remedial action (corresponding to the TS Action Statement), testing requirements (corresponding to the TS Surveillance Requirements), a list of references, and a Basis. The selected licensee commitments are part of FSAR Chapter 16; however, for user convenience, they are located in a separate binder entitled (station name) Selected Licensee Commitment Manual. This manual is located in the station control room along with the TS Manual. Other manual holders include holders of the FSAR and key station personnel that are holders of the TSs. Station activities required by these commitments are implemented by approved station procedures and/or directives. In this revision to the TSs, the controls regarding the conditions for operation and surveillance of the devices listed in the Containment Penetration Conductor Overcurrent Protective Device tables will remain in the TSs, only the tables will be relocated to the FSAR Chapter 16 SLC Manual. There will be no substantive changes to the tables as part of this revision, only format changes.

The controls provided by the existing TSs, and the FSAR Selected Licensee Commitments and associated procedures and/or directives for the relocated Containment Penetration Conductor Overcurrent Protective Device Tables, will provide an adequate level of administrative control. Any changes to the relocated Containment Penetration Conductor Overcurrent Protective Device tables will require the performance of a 10 CFR 50.59 evaluation prior to the change. This requirement is consistent with the requirement for other changes to the FSAR Chapter 16 SLC Manual. As part of the FSAR Chapter 16 SLC manual controls, any changes that involve a change to the commitment, applicability, testing requirements, or remedial action portions of a selected licensee commitment require the performance of a 10 CFR 50.59 evaluation. The relocated tables will be considered a commitment. All changes to the FSAR Chapter 16 SLC Manual must receive Station Manager approval. Upon approval of a revision to the FSAR Chapter 16 SLC Manual, the revision is distributed to all manual holders, including Regional and ONRR NRC manual holders.

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### No Significant Hazards Analysis

10 CFR 50.91 requires that the following analysis be provided concerning whether the proposed amendment request does not involve a significant hazards consideration as defined in 10 CFR 50.92. Standards for determination that an amendment request does not involve a significant hazards consideration are if operation of the facility in accordance with the proposed amendment would not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or,
- 2) Create the possibility of a new or different kind of accident from any previously evaluated; or,
- 3) Involve a significant reduction in the margin of safety.

Operation of the McGuire and Catawba facilities in accordance with the proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated.

This change is administrative in nature. The Containment Penetration Conductor Overcurrent Protective Device tables will only be reformatted for relocation to the FSAR Chapter 16 SLC Manual. No substantive changes will be made. The existing TSs will still provide the limiting condition for operation of these devices and will provide surveillance requirements. There will be no changes to these items as a result of this revision. Additionally, there will be no hardware changes or additions made to the stations as a result of this proposed amendment. Any future changes to the tables will be performed in compliance with the requirements specified by the directive governing changes to the FSAR Chapter 16 SLC Manual.

Operation of the McGuire and Catawba facilities in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated. As stated above, this change is administrative in nature. The function of the devices listed in the tables will not change as a result of this revision. The existing TSs will continue to provide the same requirements with regards to the operation and surveillance of these devices.

The directive governing changes to the FSAR Chapter 16 SLC Manual requires that any changes made to the table must be performed only after the completion of a 10 CFR 50.59 evaluation. Additionally, there will be no hardware changes or additions made to the stations as a result of this proposed amendment.

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Operation of the McGuire and Catawba facilities in accordance with the proposed amendment would not involve a significant reduction in a margin of safety. The proposed changes do not decrease the margin of safety. The existing TS requirements will remain unchanged. Any future changes to the tables in the way of adding or deleting devices will be performed in compliance with the directive governing changes to the FSAR Chapter SLC Manual. Specifically, a 10 CFR 50.59 evaluation must be performed prior to the deletion or addition of device to the table.

#### Environmental Impact Analysis

The proposed TS 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 TS amendment meets the criteria given in 10 CFR 51.22(c)(9) for a categorical exclusion from the requirement for an Environmental Impact Statement.