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DUKE POWER

August 25, 1994

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

Subject: Catawba Nuclear Station, Units 1 and 2
Docket Nos. 50-413 and 50-414
McGuire Nuclear Station, Units 1 and 2
Docket Nos. 50-369 and 50-370
Proposed Technical Specifications Changes
Increase in Auxiliary Feedwater Pump and System Testing Interval from Monthly
to Quarterly and Adoption of Clarification Note from Revised Standard Technical
Specifications for Westinghouse Plants

Gentlemen:

Pursuant to 10CFR50.4 and 10CFR50.90, attached are license amendment requests to Appendix A, Technical Specifications, of Facility Operating Licenses NPF-35 and NPF-52 for Catawba Nuclear Station Units 1 and 2, respectively and also to Appendix A, Technical Specifications, of Facility Operating Licenses NPF-9 and NPF-17 for McGuire Nuclear Station Units 1 and 2, respectively.

The requested amendments allow the testing interval for auxiliary feedwater (AFW) system pumps to be increased from monthly to quarterly on a staggered test basis. The proposed amendments are consistent with NRC staff recommendations and guidance contained in NUREG-1366, "Improvements to Technical Specifications Surveillance Requirements" and Generic Letter 93-05, "Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operation".

In addition, the requested amendments incorporate a note from Surveillance Requirement 3.7.5.2 of NUREG-1431, "Revised Standard Technical Specifications, Westinghouse Plants" into the existing Catawba and McGuire Technical Specifications governing AFW system pump testing. This note clarifies that the turbine-driven AFW pump cannot be tested until the required pressure exists in the secondary side of the steam generator.

Attachment 1 contains a background and description of the enclosed amendment request.

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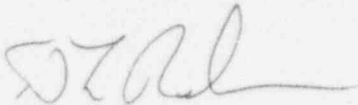
Page 2

August 25, 1994

Attachment 2 contains the required justification and safety evaluation. Pursuant to 10CFR50.91, Attachment 3 provides the analysis performed in accordance with the standards contained in 10CFR50.92 which concludes that the requested amendments do not involve a significant hazards consideration. Attachment 3 also contains an environmental impact analysis for the requested amendments. Attachments 4a and 4b contain the marked-up technical specification amendment pages for Catawba and McGuire, respectively. Duke Power Company is forwarding a copy of this amendment request package to the appropriate North Carolina and South Carolina state officials.

Should there be any questions concerning this amendment request or should additional information be required, please call L.J. Rudy at (803) 831-3084.

Very truly yours,

A handwritten signature in dark ink, appearing to read "D.L. Rehn", with a long horizontal flourish extending to the right.

D.L. Rehn

LJR/s

Attachments

Document Control Desk

Page 3

August 25, 1994

xc (W/Attachments):

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Region II

R.J. Freudenberger, Senior Resident Inspector

Catawba Nuclear Station

G.F. Maxwell, Senior Resident Inspector

McGuire Nuclear Station

R.E. Martin

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Max Batavia, Chief

Bureau of Radiological Health, SC

Dayne Brown, Director

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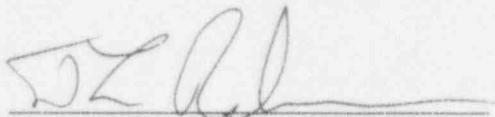
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Page 4

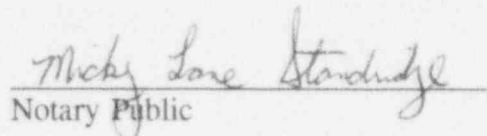
August 25, 1994

D.L. Rehn, 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 Nuclear Regulatory Commission this revision to the Catawba Nuclear Station License Nos. NPF-35 and NPF-52 and to the McGuire Nuclear Station License Nos. NPF-9 and NPF-17; and that all statements and matters set forth therein are true and correct to the best of his knowledge.



D.L. Rehn, Vice President

Subscribed and sworn to before me this 25th day of August, 1994.



Notary Public

My commission expires:

June 26th, 2002

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Page 5

August 25, 1994

bxc (W/Attachments):

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NCMPA-1

NCEMC

PMPA

SREC

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Group File CN/MC-801.01

Group File GL 93-05

ELL-EC050

ATTACHMENT 1

BACKGROUND AND DESCRIPTION OF AMENDMENT REQUEST

Background

The auxiliary feedwater (CA) system assures sufficient feedwater supply to the steam generators in the event of loss of the condensate/feedwater system, to remove energy stored in the core and primary coolant. The CA system is designed to start automatically in the event of loss of offsite electrical power, trip of both main feedwater pumps, safety injection signal, or low-low steam generator water level.

Three CA pumps per unit are provided for Catawba and McGuire. The pumps are powered from separate and diverse power sources. Two full-capacity motor-driven pumps are powered from two separate trains of emergency onsite electrical power, each normally supplying feedwater to two steam generators. One full-capacity turbine-driven pump, supplying feedwater to steam generators B and C at Catawba and to all four steam generators at McGuire, is driven from steam from steam generators B and C. Sufficient diversity and redundancy is provided such that the CA system is capable of delivering the minimum required flowrate to the steam generators during all required modes of operation.

For Catawba, Technical Specification Surveillance Requirement 4.7.1.2.1a delineates the requirements for demonstrating operability of the auxiliary feedwater pumps on a monthly basis. For McGuire, Technical Specification Surveillance Requirement 4.7.1.2a delineates the requirements for demonstrating operability of the auxiliary feedwater pumps on a monthly basis. These surveillance requirements include pump head or discharge pressure verifications and verifications of flow path and suction line valve position.

In December 1992, the NRC issued NUREG-1366, "Improvements to Technical Specifications Surveillance Requirements". In Section 9.1 of the NUREG, "Auxiliary Feedwater Pump and System Testing (PWR)", the NRC recommended that the frequency of auxiliary feedwater pump testing be changed from monthly to quarterly on a staggered test basis. This would result in increased availability of auxiliary feedwater system components, as well as decreased licensee burden relative to testing requirements.

On September 27, 1993, the NRC issued Generic Letter 93-05, "Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operation". In this generic letter, the NRC transmitted guidance to assist licensees in preparing license amendment requests to implement the recommendations of NUREG-1366 as line-item technical specifications improvements.

On September 28, 1992, the NRC issued NUREG-1431, "Revised Standard Technical Specifications, Westinghouse Plants, Revision 0". The NRC has encouraged the adoption of the new standard technical specifications (STS) by individual plants. Where utilities have chosen not to pursue wholesale adoption of the entire new STS, the NRC has indicated that they will review license amendment requests that incorporate selected elements or sections from the new STS.

Description of Amendment Request

Technical Specification Surveillance Requirements 4.7.1.2.1 (Catawba) and 4.7.1.2 (McGuire) are modified according to the example contained in Generic Letter 93-05 to specify that the motor-driven and turbine-driven pumps are to be tested at least once per 92 days on a staggered test basis.

Also, for Catawba, two obsolete footnotes on pages 3/4 7-4 and 3/4 7-5 have been deleted.

Finally, the above surveillance requirements for Catawba and McGuire are modified to incorporate the note contained in Surveillance Requirement 3.7.5.2 of the new Westinghouse STS. This note clarifies that the surveillance for the turbine-driven AFW pump is not required to be performed until 24 hours after reaching sufficient secondary side pressure (600 psig for Catawba and 900 psig for McGuire).

The associated Bases sections for Catawba and McGuire are modified to reflect the addition of the above clarification note.

ATTACHMENT 2

JUSTIFICATION AND SAFETY EVALUATION

Justification and Safety Evaluation

The proposed amendments to increase the AFW pump surveillance interval from monthly to quarterly on a staggered test basis are consistent with the NRC staff position set forth in NUREG-1366 and also with the guidance transmitted in Generic Letter 93-05. In addition, they are also compatible with observed plant operating experience as it pertains to the pump head or discharge pressure versus flow test histories at Catawba and McGuire. Finally, increasing the surveillance interval to quarterly will result in increased availability of the AFW system pumps at Catawba and McGuire, since they will not have to be made inoperable for testing as frequently.

Both Catawba and McGuire conducted a review of auxiliary feedwater performance test history in support of the proposed amendments. The review encompassed the most recent three-year period. For the monthly tests required by technical specifications, in all cases the test acceptance criteria were met for each pump at both stations.

The proposed amendments to incorporate the note of clarification from Surveillance Requirement 3.7.5.2 of the new Westinghouse STS are consistent with the NRC staff position of encouraging utilities to adopt the new STS, either in its entirety, or on a selective basis. Incorporation of the note will provide needed clarification to the existing Catawba and McGuire Technical Specifications. The existing specifications have contributed to a difference in operational practices between Catawba and McGuire concerning testing of the turbine-driven AFW pump. Catawba's practice has been to declare the pump inoperable upon entering Mode 3 and achieving 500 psig in the secondary side of the steam generator and to enter Action a of Limiting Condition for Operation 3.7.1.2 prior to performing the surveillance. McGuire's practice has been to conduct the surveillance at slightly less than 900 psig, thereby avoiding entry into the corresponding action statement. Incorporating the described note will clarify the existing specifications for both plants and will result in consistency of practice relative to testing of the turbine-driven pump at both stations.

ATTACHMENT 3

**NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION
AND ENVIRONMENTAL IMPACT ANALYSIS**

No Significant Hazards Consideration Determination

As required by 10CFR50.91, this analysis is provided concerning whether the requested amendments involve significant hazards considerations, as defined by 10CFR50.92. Standards for determination that an amendment request involves no significant hazards considerations are if operation of the facility in accordance with the requested 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 accident previously evaluated; or 3) Involve a significant reduction in a margin of safety.

The requested amendments decrease from monthly to quarterly the frequency at which the motor-driven and turbine-driven AFW pumps must be demonstrated operable as specified in TSs 4.7.1.2.1 (Catawba) and 4.7.1.2 (McGuire). They also incorporate a note of clarification from the new Westinghouse STS into the existing Catawba and McGuire specifications concerning when the pump head or discharge pressure versus flow verification for the turbine-driven pump is required to be performed.

In 48FR14870, the Commission has set forth examples of amendments that are considered not likely to involve significant hazards considerations. Example vii describes a change to make a license conform to changes in regulations, where the license change results in very minor changes to facility operations clearly in keeping with the regulations. The requested amendments are similar to example vii in that they result in minor changes to plant surveillance requirements and are consistent with the existing NRC position and guidance contained in NUREG-1366 and Generic Letter 93-05, as well as NUREG-1431. While the issuance of NUREG-1366 and Generic Letter 93-05, as well as NUREG-1431 does not constitute a change in existing regulations, it nevertheless establishes the NRC staff's position concerning the acceptability of decreasing the surveillance frequency of AFW pumps from monthly to quarterly and concerning the acceptability of adopting all or part of the new STS. The requested amendments are consistent with the position of NUREG-1366 and with the guidance of Generic Letter 93-05, as well as with NUREG-1431.

Criterion 1

The requested amendments will not involve a significant increase in the probability or consequences of an accident previously evaluated. Decreasing the frequency of AFW pump testing as specified in TS from monthly to quarterly will have no impact upon the probability of any accident, since the AFW pumps are not accident initiating equipment. Also, since Catawba's and McGuire's AFW pump performance histories support making the proposed change, system response following an accident will not be adversely affected. Therefore, the requested amendments will not result in increased accident consequences. Deletion of the obsolete footnotes as indicated in the Catawba technical specification markups is purely an administrative change, and therefore will have no impact upon either the probability or consequences of any accident. Incorporating the new STS note will only serve to clarify when the turbine-driven pump is required to be tested and will not have any impact upon either the probability or consequences of any accident. The pump will still be tested as before and its acceptance criteria will be unaffected.

Criterion 2

The requested amendments will not create the possibility of a new or different kind of accident from any accident previously evaluated. As stated above, the AFW pumps are not accident initiating equipment. No new failure modes can be created from an accident standpoint. The plant will not be operated in a different manner. Deletion of the Catawba obsolete footnotes has no bearing on any accident initiating mechanisms. Incorporating the clarifying note from the new STS will not result in any new accident sequences, since plant operation will be unaffected.

Criterion 3

The requested amendments will not involve a significant reduction in a margin of safety. Plant safety margins will be unaffected by the proposed changes. The AFW pumps will still be capable of fulfilling their required safety function, since plant operating experience supports the proposed change. The availability of the AFW pumps will be increased as a result of the proposed amendments because they will not have to be made unavailable for testing as frequently. Finally, the proposed amendments are consistent with the NRC position and guidance set forth in NUREG-1366 and Generic Letter 93-05. Deletion of the Catawba obsolete footnotes will not result in any impact to plant safety margins. Incorporating the note from the new STS will not impact any safety margins.

Based upon the preceding analyses, Duke Power Company concludes that the requested amendments do not involve a significant hazards consideration.

Environmental Impact Analysis

The proposed technical specification amendment has been reviewed against the criteria of 10CFR51.22 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 10CFR51.22(c)(9) for a categorical exclusion from the requirement for an Environmental Impact Statement.