



**DUKE POWER**

October 4, 1994

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

Subject: McGuire Nuclear Station  
Unit 1,2 - Docket No: 50-369 & 370  
Proposed Exigent Technical Specification Amendment  
Number of Centrifugal Charging (NV) Pumps in Modes 4,5 and 6  
TS 3.1.2.3, 3.1.2.4, 3.5.3, Bases 3.1.2, Bases 3.5.2 and 3.5.3

Dear Sir:

Pursuant to 10 CFR 50.4, 50.90 and 50.91(6), please find attached (Attachment 1) proposed exigent license amendments to Appendix A (Technical Specifications) of Facility Operating Licenses NPF-9 and NPF-17 for McGuire Nuclear Station. The proposed changes provided by this submittal correct a technical deficiency existing in these Technical Specifications which has caused difficulty to plant operations when swapping of the NV pumps was needed in Modes 4,5 and 6. This difficulty was explained to your staff in telephone conversations on September 30, 1994. This exigent technical specification amendment is requested to avoid a violation of the subject Technical Specifications and to permit flexibility in the operation of the NV pumps during unit startup. McGuire Unit 1 is currently in cycle 10 startup process.

Technical Specification surveillance 4.1.2.3.2 states "All Centrifugal Charging pumps, excluding the above required OPERABLE pump, shall be demonstrated inoperable at least once per 31 days, except when the reactor vessel head is removed, by verifying that the motor circuit breakers are secured in the open position or by verifying the discharge of each charging pump has been isolated from the Reactor Coolant System by at least two isolation valves with power removed from the valve operator."

The footnote associated with Technical Specification 3.1.2.4 states that "A maximum of one Centrifugal Charging pump shall be OPERABLE whenever the temperature of one or more of the NCS cold legs is less than or equal to 300° F".

The footnote associated with Technical Specification 3.5.3 states "A maximum of one Centrifugal Charging pump and one Safety Injection pump shall be OPERABLE whenever the temperature of one or more of the NCS cold legs is less than or equal to 300° F".

The combination of these technical specifications precludes having more than one NV pump operable (i.e. racked in service or operating) until Reactor Coolant (NC) system temperature exceeds 300° F.

During unit startup at temperatures less than 300° F, unforeseen circumstances may sporadically arise, i.e. necessity to change operating trains, chemical additions, etc. which require the Operators to swap

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trains of safety related equipment, including the NV pumps. The NV pumps supply seal injection water to the NC pumps. Since one or more NC pumps are running to support Reactor Coolant system heatup, NC pump seal supply from the NV pump is required to be maintained.

When such circumstances arise, a second NV pump is racked in and started in order to maintain NC pump seal flow until the first NV pump can be shutdown and racked out of service. For a short period during this transition, both NV pumps are operable, and compliance with subject TS requirements is not achieved. Furthermore, the associated Action Statements do not provide any actions directly related to this situation.

The proposed TS Amendment would allow operation of two NV pumps in the above described fashion for up to 15 minutes in order to preserve seal supply to the operating NC pumps. Duke Power believes this approach is in the interest of nuclear safety in that the NV flow to the NC pump is required to maintain the integrity of the NC pump seals thus preventing a potential NC pump seal failure and the accompanying small break Loss Of Coolant Accident (LOCA) event.

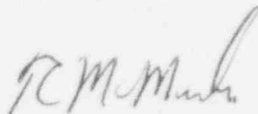
The action described above is reflected in Required Action B.1 of Limiting Condition for Operation 3.4.12 of the new Standardized Technical Specification which has been previously endorsed by the NRC.

McGuire Unit 1 is currently in Mode 5 completing final testing associated with the 1EOC9 refueling outage. Restart heatup activities are scheduled to begin on Saturday, October 1, 1994. McGuire staff personnel had been developing a technical specification interpretation in order to resolve this issue. In a development review meeting on September 29, 1994, it was realized that an interpretation would not be allowed because the interpretation would, in effect, alter the intent of the subject technical specifications.

Approval of the proposed TS Amendment is needed immediately in order to allow simultaneous operation of two NV pumps in support of these startup activities.

Attachment 1 contains the marked up TS pages indicating the proposed changes. Attachment 2 contains the Technical Justification for the proposed changes. Attachment 3 contains the Safety Analysis and No Significant Hazards Analysis. This analysis concluded that the proposed amendment does not involve a significant hazards consideration. By copy of this submittal, this amendment request application and No Significant Hazards Consideration Evaluation are being forwarded to the appropriate North Carolina State Official.

Very truly yours,



T. C. McMeekin

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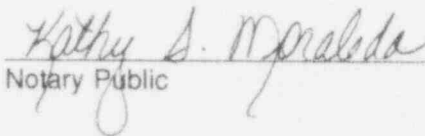
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T.C. McMeekin, being duly sworn, states that he is Vice-President of Duke Power Company; that he is authorized on the part of said company to sign and file with the U.S. Nuclear Regulatory Commission these revisions to the McGuire Nuclear Station license 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.



T.C. McMeekin, Site Vice-President

Subscribed and sworn to before me this 4th day of October 1994.

  
Notary Public

My Commission Expires:

December 13, 1998

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**ATTACHMENT 1**  
**PROPOSED CHANGES**