

Duke Power Company  
Catawba Nuclear Generation Department  
4800 Concord Road  
York, SC 29745

D. L. REHN  
Vice President  
(803)831-3205 Office  
(803)831-3426 Fax



**DUKE POWER**

January 18, 1995

U.S. Nuclear Regulatory Commission  
Attention: 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 (TS) Changes  
Relocation of Seismic Instrumentation, Meteorological Instrumentation,  
and Loose-Part Detection System to Selected Licensee Commitment (SLC)  
Manual

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 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 relocate the requirements for the seismic instrumentation, meteorological instrumentation, and loose-part detection system from the TS to the SLC Manual for each station. The SLC Manual is Chapter 16 of the Final Safety Analysis Report (FSAR).

Attachment 1 contains a background and description of the enclosed amendment requests. 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 TS amendment pages for Catawba and McGuire, respectively. Attachments 5a and 5b contain the proposed SLC Manual sections for Catawba and

270093

9501310435 950118  
PDR ADOCK 05000369  
P PDR

Printed on recycled paper

Aool  
1/1

Document Control Desk

Page 2

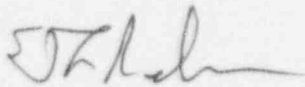
January 18, 1995

McGuire, respectively. Duke Power Company is forwarding a copy of this amendment request package to the appropriate North Carolina and South Carolina state officials.

Duke Power Company requests NRC approval of these proposed amendments by March 31, 1995. Catawba is planning to replace the meteorological tower and this effort will require the relocation of the meteorological instruments to a slightly different elevation (which in turn will require a revision to the associated proposed SLC section for Catawba). Relocation of the meteorological instruments is planned for April 1995.

Should there be any questions concerning these amendment requests 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 'DL Rehn', with a stylized flourish at the end.

D L. Rehn

LJR/s

Attachments

Document Control Desk

Page 3

January 18, 1995

xc (with attachments):

S.D. Ebnetter, Regional Administrator  
Region II

R.J. Freudenberger, Senior Resident Inspector

G.F. Maxwell, Senior Resident Inspector

R.E. Martin, Senior Project Manager  
ONRR

V. Nerses, Senior Project Manager  
ONRR

Max Batavia, Chief  
Bureau of Radiological Health, SC

Dayne Brown, Chief  
Division of Radiation Protection, NC

American Nuclear Insurers

M&M Nuclear Consultants

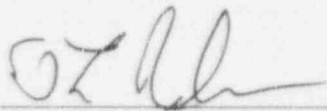
INPO Records Center

Document Control Desk

Page 4

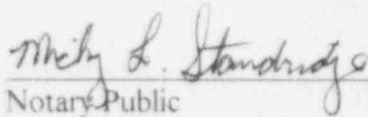
January 18, 1995

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 these revisions 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 18th day of January, 1995.



Notary Public

My commission expires:

6-26-2002

**ATTACHMENT 1**

**BACKGROUND AND DESCRIPTION OF AMENDMENT REQUEST**

## **Background**

Section 3/4.3, Instrumentation, of the Catawba and McGuire TS delineates requirements for various instrumentation throughout the plant. Section 3/4.3.3.3 in the Catawba and McGuire TS governs seismic instrumentation; Section 3/4.3.3.4 in the Catawba and McGuire TS governs meteorological instrumentation; and Sections 3/4.3.3.9 in the Catawba TS and 3/4.3.3.10 in the McGuire TS govern the loose-part detection system. These sections were originally included in the Catawba and McGuire TS due to their being contained in NUREG-0452, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors".

On September 28, 1992, the NRC issued NUREG-1431, "Revised Standard Technical Specifications for Westinghouse Plants". The NRC has encouraged utilities to pursue adoption of the Revised Standard Technical Specifications (RSTS). Where utilities have elected not to adopt the entire RSTS, the NRC has indicated that they will allow the adoption of selected RSTS sections and has encouraged utilities to propose license amendments consistent with the content of the RSTS.

For the meteorological instrumentation at Catawba, it has been determined that in TS Table 3.3-8, Meteorological Monitoring Instrumentation, and Table 4.3-5, Meteorological Monitoring Instrumentation Surveillance Requirements, the elevations specified are actually slightly in error. Slight discrepancies exist among the TS elevations, the actual field elevations, and the elevations specified in design drawings. These slight discrepancies were determined to have no impact upon the operability of the meteorological instrumentation.

Duke Power Company is planning to replace the meteorological tower at Catawba. When the meteorological instruments are relocated from the old to the new tower, the above elevation discrepancies will be corrected. This will require changes to the values currently in the TS tables. Duke Power Company is therefore proposing that the controls presently contained in the TS for the meteorological instrumentation (as well as for the seismic instrumentation and the loose-part detection system) be relocated to the SLC Manual. This will allow future changes to these controls to be performed under the provisions of 10CFR50.59.

## **Description of Amendment Request**

TS sections 3/4.3.3.3, Seismic Instrumentation, 3/4.3.3.4, Meteorological Instrumentation, and 3/4.3.3.9 (Catawba) and 3/4.3.3.10 (McGuire), Loose-Part Detection System, along with all corresponding Bases sections, are relocated from the TS to the SLC Manual. The TS Index for each station is also modified to reflect the above changes. No changes are being made to the technical content of the affected TS sections.

**ATTACHMENT 2**

**JUSTIFICATION AND SAFETY EVALUATION**

### **Justification and Safety Evaluation**

As no technical changes are being proposed to the TS sections being relocated to each station's SLC Manual, the requested amendments are considered purely administrative in nature. The only ACTION requirement contained in the affected TS sections pertains to the submittal of a Special Report when the corresponding instrumentation is inoperable for more than the specified time period. This requirement will continue to be met when the affected TS sections are relocated to the SLC Manual. In addition, all SURVEILLANCE REQUIREMENTS for the instrumentation will continue to be met.

The instrumentation contained in the affected TS sections is not safety-related and performs no safety-related function. The reliability of the instrumentation will not be impacted by the proposed amendments. No changes to the manner in which the instrumentation is used are being made, so plant operation will not be affected.

Finally, the proposed changes are consistent with the Westinghouse Revised Standard Technical Specifications in that the affected TS sections are no longer contained in the RSTS. When the RSTS was developed, the NRC did not consider the seismic instrumentation, meteorological instrumentation, or loose-part detection system to warrant technical specification control. Further, the NRC has encouraged licensees to pursue changes to technical specifications to make them consistent with the RSTS, either through wholesale adoption of the RSTS, or through adoption of selected sections of the RSTS. The proposed amendments are consistent with that philosophy.

Duke Power Company maintains that approval of the proposed amendments will not be inimical to the health and safety of the public.



**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 relocate the controls for the seismic instrumentation, meteorological instrumentation, and loose-part detection system for Catawba and McGuire from the TS to the SLC Manual.

In 48FR14870, the Commission has set forth examples of amendments that are considered not likely to involve significant hazards considerations. Example (i) describes a change to technical specifications which is purely administrative in nature, such as a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature. In this case, the proposed amendments are similar to example (i) in that they merely relocate the controls for selected instrumentation from the TS to the SLC Manual. They will make the Catawba and McGuire TS more consistent with the Westinghouse RSTS.

#### Criterion 1

The requested amendments will not involve a significant increase in the probability or consequences of an accident previously evaluated. Relocation of the affected TS sections to the SLC Manual will have no effect on the probability of any accident occurring. In addition, the consequences of an accident will not be impacted since the above instrumentation will continue to be utilized in the same manner as before. No impact on the plant response to accidents will be created.

#### Criterion 2

The requested amendments will not create the possibility of a new or different kind of accident from any accident previously evaluated. No new accident causal mechanisms will be created as a result of relocating the affected TS requirements to the SLC Manual. Plant operation will not be affected by the proposed amendments and no new failure modes will be created.

#### Criterion 3

The requested amendments will not involve a significant reduction in a margin of safety. No impact upon any plant safety margins will be created. Relocation of the affected TS requirements to the SLC Manual is consistent with the content of the Westinghouse RSTS, as the NRC did not require technical specification controls for the affected instrumentation in the RSTS. The proposed amendments are consistent with the NRC

philosophy of encouraging utilities to propose amendments that are consistent with the content of the RSTS.

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 license amendments have been reviewed against the criteria of 10CFR51.22 for environmental considerations. The proposed amendments do not involve a significant hazards consideration, nor do they increase the types and amounts of effluents that may be released offsite, nor do they increase individual or cumulative occupational radiation exposures. Therefore, the proposed amendments meet the criteria given in 10CFR51.22(c)(9) for a categorical exclusion from the requirement for an Environmental Impact Statement.

**ATTACHMENT 4a**

**PROPOSED TECHNICAL SPECIFICATION AMENDMENTS FOR CATAWBA**