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DUKE POWER

Date: January 18, 1995

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

Subject: McGuire Nuclear Station, Units 1 and 2
Docket Nos.
Proposed Technical Specifications Changes
Increase in Radiation Monitoring Instrumentation Surveillance Interval
from Monthly to Quarterly

Gentlemen:

Pursuant to 10CFR50.4 and 10CFR50.90, attached are license amendment requests 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 analog channel operational test interval for radiation monitoring instrumentation to be increased from monthly to quarterly. The proposed amendments are consistent with NRC staff recommendations and guidance contained in NUREG-1366, "Improvements to Technical Specification Surveillance Requirements" and Generic Letter 93-05 "Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operation."

Attachment 1 contains a background and description of the enclosed amendment request. 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. Attachment 4 contains the marked-up technical specification amendment pages for McGuire. Duke Power Company is forwarding a copy of this amendment request package to the appropriate North Carolina state official.

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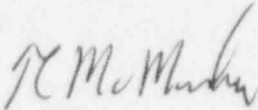
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Relaxation of the annalog channel operational test interval for radiation monitoring instrumentation from monhtly to quarterly will result in an increase in the availability of the instruments. This amendment request is also being submitted as a Cost Beneficial Licensing Action (CBLA) item. Approval and implementation of this amondment request is expected to result in substantial savings in resources relative to conducting surveillance activities for radiation monitoring instrumentation. Accordingly, timely approval of this proposed amendment is requested. An implementation date of 30 days from the date of NRC approval is requested.

Should there be any questions concerning this amendment request or should additional information be required, please call Dwin Caldwell at (704) 875-4328.

Very truly yours,



T. C. McMeekin

LJR/s

Attachments

xc(W/Attachments):

S. D. Ebnetter, Regional Administrator
Region II

George Maxwell , Senior Resident Inspector

R. E. Martin
ONRR

Dayne Brown, Chief
Division of Radiological Protection, N.C.

American Nuclear Insurers

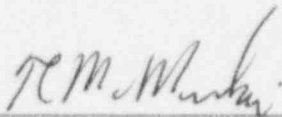
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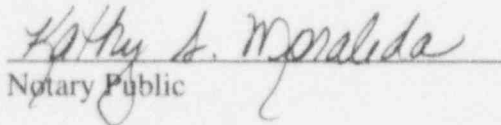
Date: January 18, 1995

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 Nuclear Regulatory Commission this revision 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, Vice President

Subscribed and sworn to before me this 18th day of JAN., 1995.



Notary Public

My commission expires:

December 13, 1998

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bxc: (with attachments)

A. V. Carr

J. E. Snyder

G. A. Copp

Z. L. Taylor

J. W. Boyle

ELL-EC050

G. A. Frix

Reg. Comp. File: Technical Specifications

ATTACHMENT 1

BACKGROUND AND DESCRIPTION OF AMENDMENT REQUEST

Background

Radiation monitoring (EMF) instrumentation at McGuire is divided into basic types: process radiation monitors and area radiation monitors.

Process radiation monitors monitor primary and secondary systems within the station during normal operations, including anticipated operational occurrences. They provide continuous monitoring of radioactive liquid and gas discharge to the environment. They also provide interlocks to automatically terminate discharge from waste systems at preset activity levels. Finally, they provide monitoring of airborne and liquid activity in selected locations and effluent paths during postulated loss of coolant accidents.

Area radiation monitors indicate radiation levels at various locations throughout the station where personnel exposure is likely. In addition, they sound local and Control Room alarms when radiation levels exceed the respective alarm setpoint.

Technical specifications delineate surveillance requirements for certain EMFs at McGuire. Included in the specified surveillance requirements is a monthly analog channel operational test.

In December 1992, the NRC issued NUREG-1366, "Improvements to Technical Specifications Surveillance Requirements." In Section 5.14 of the NUREG, "Radiation Monitors," the NRC recommended that the frequency of radiation monitor channel functional tests be changed from monthly to quarterly. This would result in increased availability of radiation monitoring equipment, as well as decreased licensee burden relative to testing requirements.

On September 26, 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.

Description of Amendment Request

In Technical Specification Table 4.3-3, Radiation Monitoring Instrumentation for Plant Operations Surveillance Requirements, the frequency of the analog channel operational test specified is changed from monthly (M) to quarterly (Q) for all EMFs listed in the table.

No changes to the associated Bases section for this technical specification are required.

ATTACHMENT 2

JUSTIFICATION AND SAFETY EVALUATION

Justification and Safety Evaluation

The proposed amendments 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 surveillance history of the radiation monitors at McGuire.

McGuire personnel performed a review of a sample of completed analog channel operational test procedures for the radiation monitors listed in McGuire's Technical Specifications. Approximately 12 consecutive monthly tests were analyzed by reviewing text descriptions of work performed via McGuire's computer based Work Management System (WMS) and by reviewing test data from several completed procedures per channel via microfilm. These procedures had been completed in calendar years 1993 and 1994. This emphasized the most recent test history of the radiation monitors. No problems were found which would preclude lengthening the surveillance interval for Analog Channel Operational Tests from monthly to quarterly. The radiation monitor performance history as observed over the review period is typical of performance history over the plant operating life. The completed analog channel operational test procedures are available for NRC inspection.

The proposed amendments will not be detrimental from a safety standpoint. The change in surveillance frequency for the radiation monitors listed in Technical Specification Table 4.3-3 from monthly to quarterly will not affect any accident analyses contained in Chapter 15 of the Final Safety Analysis Report. The data reviewed for this amendment request supports this conclusion. Further, no credit is taken in the plant accident analyses for any automatic actuation function generated as a result of a signal generated by a monitor covered by this amendment. Finally, changing the surveillance interval from monthly to quarterly will increase the availability of the affected radiation monitors as indicated in NUREG-1366 and Generic Letter 93-05.

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 increase the surveillance interval (i.e., decrease the analog channel operational test frequency) of radiation monitoring instrumentation (EMFs) from monthly to quarterly.

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. While the issuance of NUREG-1366 and Generic Letter 93-05 does not constitute a change in existing regulations, it nevertheless establishes the NRC staff's position concerning the acceptability of increasing the surveillance interval for radiation monitoring instrumentation from monthly to quarterly. The requested amendments are consistent with the position of NUREG-1366 and with the guidance of Generic Letter 93-05.

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 the radiation monitor analog channel operational test from monthly to quarterly will have no impact upon the probability of any accident, since the radiation monitors are not accident initiating equipment. Analysis of the previous test data, as described in Attachment 2, shows that no significant degradation of performance is to be expected by the decrease in frequency. Therefore, the requested amendments will have no adverse impact upon the consequences of any accident.

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 radiation monitors 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.

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. No safety equipment which is taken credit for in accident analyses will be affected by the requested amendments. The availability of the affected radiation monitors will be increased as a result of the proposed amendments because the monitors will not have to be made unavailable for testing as frequently. In addition, radiation monitor operating experience supports the proposed amendments. Finally, the proposed amendments are consistent with the NRC position and guidance set forth in NUREG-1366 and Generic Letter 93-05.

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.