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REFERENCE
CATAWBA NUCLEAR STATION
SELECTED LICENSEE COMMITMENTS

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VICE PRESIDENT
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A001

EB



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Catawba Nuclear Station
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March 22, 2001

RE: Catawba Nuclear Station
Selected Licensee Commitments Manual
Revision Date 06/10/99 (Reissue)

Attached are revisions to the Catawba Nuclear Station Selected Licensee Commitments Manual.
Please remove and replace the following pages:

REMOVE

INSERT

LIST OF EFFECTIVE PAGES

Page 4 dated 11/30/00

Page 4 dated 11/30/00

TAB 16.9

Chapter 16.9-3, pages 1-4

Chapter 16.9-3, pages 1-4

This revision is being made to correct an editorial error concerning revision dates and placement of change bars on certain pages. The actual information contained in the revised SLC is unchanged as a result of this revision.

If you have any questions concerning the contents of this package update, contact Toni Pasour at (803) 831-3566.

Gary D. Gilbert
Regulatory Compliance Manager

**CATAWBA NUCLEAR STATION
SELECTED LICENSEE COMMITMENTS MANUAL**

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16.9 AUXILIARY SYSTEMS - FIRE PROTECTION SYSTEMS

16.9-3 CO2 SYSTEMS

COMMITMENT:

The following High Pressure and Low Pressure CO₂ Systems shall be OPERABLE:

- a. Low Pressure CO₂ System - Diesel generator rooms, and
- b. High Pressure CO₂ System - Auxiliary feedwater pump rooms

APPLICABILITY:

Whenever equipment protected by the Systems is required to be OPERABLE.

REMEDIAL ACTION:

- a. With one or more of the Low Pressure CO₂ System (Diesel Generator Rooms) inoperable, within one hour establish an hourly fire watch with backup fire suppression equipment as long as the fire barrier between the affected A and B train D/G rooms is intact. If the fire barrier between the affected A and B train D/G rooms is not intact or backup fire suppression equipment is not available, establish a continuous fire watch
- b. With one or more of the High Pressure CO₂ Systems (Aux. Feedwater Pump Rooms) inoperable, within one hour establish a continuous fire watch.

TESTING REQUIREMENTS:

- a. Each of the above required CO₂ Systems shall be demonstrated OPERABLE by visual verification that each valve (manual, power operated, or automatic) in the flow path is in the correct position.
The frequency of the verification shall be determined by the performance based criteria in the Bases Section.
- b. Each of the above required Low Pressure CO₂ Systems shall be demonstrated OPERABLE:
 - i. At least once per 31 days by verifying the CO₂ storage tank level to be greater than 44% of full capacity, and

TESTING REQUIREMENTS (cont'd)

- ii. At least once per 18 months by verifying:
 - 1) Each system actuates manually and automatically, upon receipt of a simulated actuation signal,
 - 2) Normal and Emergency Ventilation System Fans receive an "off" signal upon system operation, and
 - 3) By a visual inspection of discharge nozzles to assure no blockage.
- c. Each of the above required High Pressure CO₂ Systems shall be demonstrated OPERABLE:
 - i. At least once per 6 months by verifying the weight of each CO₂ storage cylinder to be at least 90% of full charge weight, and
 - ii. At least once per 18 months by:
 - 1) Verifying each system actuates manually and automatically upon receipt of a simulated actuation signal,
 - 2) Verifying that damper closure devices receive an actuation signal upon system operation, and
 - 3) A visual inspection of the discharge nozzles to assure no blockage.
- d. Each of the initiating device circuits for both the Low Pressure CO₂ and the High Pressure CO₂ Systems shall be demonstrated OPERABLE:
 - i. At least once per 6 months by performing a visual inspection of all spot type heat detectors.
 - ii. At least once per 6 months by simulating actuation of the system by applying a heat source to one restorable spot type heat detector in the circuit. A different detector shall be selected for each test.
 - iii. For non-restorable spot type heat detectors, at least 2%, or fraction thereof, shall be removed and functionally tested once every 15 years. For each failure that occurs on the detectors removed, two additional detectors shall be removed and tested. An acceptable alternative is to

TESTING REQUIREMENTS (cont'd)

replace all non-restorable spot type heat detectors at least once every 15 years.

- iv. At least once per 6 months by verifying the supervisory function of the alarm circuits operate properly and provide the correct alarm responses.

REFERENCES

- 1) Catawba FSAR, Section 9.5.1
- 2) Catawba SER, Section 9.5.1
- 3) Catawba SER, Supplement 3, Section 9.5.1

BASES:

The OPERABILITY of the Fire Suppression Systems ensures that adequate fire suppression capability is available to confine and extinguish fires occurring in any portion of the facility where safety-related equipment is located. The Fire Suppression System consists of the water system, spray, and/or sprinklers, CO₂, and fire hose stations. The collective capability of the Fire Suppression Systems is adequate to minimize potential damage to safety-related equipment and is a major element in the facility Fire Protection Program.

The proper positioning of RF/RV valves is critical to delivering fire suppression CO₂ at the fire source as quickly as possible. The option of increasing or decreasing the frequency of valve position verification allows the ability to optimize plant operational resources. Should an adverse trend develop with CO₂ Systems valve positions, the frequency of verification shall be increased. Similarly if the CO₂ Systems valve position trends are positive, the frequency of verification could be decreased. Through programmed trending of CO₂ Systems as found valve positions, the CO₂ fire protection systems will be maintained at predetermined reliability standards. The RF/RV System Engineer is responsible for trending and determining verification frequencies based on the following:

Initially the frequency will be monthly.

Annually review the results of the completed valve position verification procedures.

- If the results demonstrates that the valves are found in the correct position at least 99% of the time, the frequency of conducting the valve position verification may be decreased from - monthly to quarterly or - quarterly to semiannually or –

BASES (cont'd)

semiannually to annually - as applicable. The frequency shall not be extended beyond annually (plus grace period).

- If the results demonstrates that the valves are not found in the correct position at least 99% of the time, the frequency of conducting the valve position verification shall be increased from - annually to semiannually or - semiannually to quarterly or - quarterly to monthly - as applicable. The valve position verification need not be conducted more often than monthly.

The main bank (9 cylinders) or the reserve bank (9 cylinders) provides a sufficient quantity of CO₂ to totally flood any of the three CA pump pits with the required design concentration. Therefore, the high pressure CO₂ system is operable with the system aligned to either the main or the reserve bank of cylinders. The system is aligned to the main or reserve bank of cylinders by means of a local manual toggle switch.

In the event that portions of the Fire Suppression Systems are inoperable, alternate backup fire-fighting equipment is required to be made available in the affected areas until the inoperable equipment is restored to service. When the inoperable fire-fighting equipment is intended for use as a backup means of fire suppression, a longer period of time is allowed to provide an alternate means of fire fighting than if the inoperable equipment is the primary means of fire suppression.

This Selected Licensee Commitment is part of the Catawba Fire Protection Program and therefore subject to the provisions of the Catawba Facility Operating License Conditions #6 for NPF-52 and #8 for NPF-35.