

July 21, 2003

Mr. D. M. Jamil
Vice President
Catawba Nuclear Station
Duke Energy Corporation
4800 Concord Road
York, South Carolina 29745

SUBJECT: CATAWBA NUCLEAR STATION, UNITS 1 AND 2 RE: FURTHER REQUEST
FOR ADDITIONAL INFORMATION (TAC NOS. MB7842 AND MB7843)

By letter dated June 9, 2003, you provided additional information concerning your February 25, 2003, amendment request that proposed to change the requirements for inspection of the steam generators. Your June 9, 2003, letter responded to our letters dated April 30, and May 29, 2003.

We have reviewed your June 9, 2003, letter and with two exceptions, find it acceptable to complete our review. The first exception involves the reporting requirements in Section 5.6.8 of your proposal. It is our understanding that you plan to modify your submittal to indicate that a report would be submitted that is not dependent on the percentage of tubes satisfying the performance criteria. We find that acceptable.

The second exception is the wording for the structural integrity performance criterion, specifically related to an appropriate safety factor for bending loads. As discussed in meetings, phone calls and the recent NRC Commission meeting, which was held May 29, 2003, the NRC staff has not yet accepted the 1.2 value that you have proposed for the safety factor associated with the structural performance criterion for bending loads. Based on our review of the American Society of Mechanical Engineer Code's philosophy for determining safety factor, as well as past precedent for piping, it is not evident that 1.2 is the correct safety factor or whether some other factor is more appropriate (e.g. 1.4). The Nuclear Energy Institute (NEI) committed at the Commission meeting to provide to the Commission an analysis of the impact of using 1.2 or 1.4 in steam generator tube integrity assessments. This assessment would enable us to evaluate the safety significance of using a safety factor of 1.2 for bending loads for Catawba, as well as for the rest of the industry for which Catawba is a pilot plant for this technical specification change. At the Commission meeting, NEI stated that this analysis was to be completed in a couple of weeks.

Subsequent to that meeting, we tentatively scheduled a public meeting with you to work to resolution of the safety factor issue; the meeting was to be held on July 15, 2003. The draft agenda for this meeting specified that the meeting was being held to understand the impact of using 1.2 or 1.4, and also understand the technical justification of using 1.2 as a safety factor. This meeting was canceled at industry's request because the impact analysis was not going to be completed by that date. We were advised that this analysis would not be completed until the end of August, at the earliest.

At this juncture, we are unable to complete our review of your submittal until we have an opportunity to evaluate the industry's impact analysis of the difference in safety factors of 1.2 and 1.4. It is our hope that this work be completed expeditiously so that we can bring to a close

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the effort on NEI 97-06, "Steam Generator Program Guidelines." It should be noted that we would be receptive to an approach that demonstrates for each type of plant that the bending loads are small and, therefore, do not play a meaningful role in determining structural integrity of the steam generator tubes.

Please contact me at 301-415-1419 if you have any further questions on this matter.

Sincerely,
/RA/

Leonard N. Olshan, Project Manager, Section 1
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-413 and 50-414

cc: See next page

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