

September 30, 2003

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

SUBJECT: CATAWBA NUCLEAR STATION, UNITS 1 AND 2 RE: REQUEST FOR
ADDITIONAL INFORMATION (TAC NOS. MB8106, MB8107, MB8109 AND
MB8110)

Dear Mr. Jamil:

By letter dated March 20, 2003, you submitted an application for amendment of the Technical Specifications (TS) for the Catawba Nuclear Station (Catawba), Units 1 and 2, to revise the reactor vessel pressure-temperature (P-T) limits in the Catawba TS. The U. S. Nuclear Regulatory Commission technical staff has reviewed the application and has determined that additional information is required, as identified in the Enclosure.

We discussed these issues with your staff on September 24, 2003. Your staff indicated that you would attempt to provide your response by October 20, 2003.

Please contact me at (301) 415-1493, if you have any other questions on these issues.

Sincerely,

/RA/

Robert E. Martin, Senior Project Manager, Section 1
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-413 and 50-414

Enclosure: As stated

cc w/encl: See next page

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DATE	09/27 /03	09/25/03	09/25 /03

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REQUEST FOR ADDITIONAL INFORMATION

DUKE POWER COMPANY

CATAWBA NUCLEAR STATION, UNITS 1 AND 2

DOCKET NOS. 50-413 AND 50-414

The Nuclear Regulatory Commission (NRC) staff has reviewed the licensee's submittal dated March 20, 2003, regarding proposed changes to the low temperature overpressure (LTOP) Technical Specifications (TS). The NRC staff has identified the following information that is needed to enable the continuation of its review.

1. The Surveillance Requirement (SR) 3.4.12.3 NOTE is proposed to state "Only required to be performed when complying with Required Action G.2." The proposed format is not correct. SRs verify that the limiting condition for operation (LCO) is being met and do not refer to required actions. Since LCO 3.4.12.d for the reactor coolant system (RCS) vent is proposed to be deleted, the proposed revision to the SR 3.4.12.3 NOTE is not acceptable and needs to be revised.
2. NUREG-1431, "Standard Technical Specifications (STS) for Westinghouse Plants," has two surveillance requirements that relate to LCO 3.4.12.b (two residual heat removal suction relief valves) that have the following requirements:

SR 3.4.12.4 Verify [residual heat removal] RHR suction valve is open for each required RHR suction relief valve. Frequency is 12 hours.

SR 3.4.12.7 Verify associated RHR suction isolation valve is locked open with operator power removed for each required RHR suction relief valve. Frequency is 31 days.

In its submittal dated March 20, 2003, the licensee proposed to add the following surveillance requirement to the Catawba TS:

SR 3.4.12.7 Verify both associated RHR suction isolation valves are open with operator power removed for each required RHR suction relief valve. Frequency is 12 hours.

Given that the licensee is proposing to operate with a maximum of two pumps injecting into the RCS during MODES 4 and below, the licensee should either adopt STS SR 3.4.12.4 or explain why it is not necessary to verify that LCO 3.4.12.b is being met. In addition, the licensee should address why the RHR suction isolation valves are not locked open as described in STS 3.4.12.7.

3. Page 2-3 of Attachment 2, "Description of Proposed Changes and Technical Justification," of the licensee's submittal describes the RHR system. Specifically, the licensee's submittal states that "The two inlet isolation valves in each subsystem are separately and independently interlocked with pressure signals to prevent their being opened whenever the RCS pressure is greater than approximately 385 psig." The licensee has proposed a new LCO 3.4.12.b which would state:

Enclosure

“Two residual heat removal (RHR) suction relief valves with lift settings ≥ 417 psig and ≤ 509 psig with an indicated RCS cold leg temperature $\geq 70^{\circ}\text{F}$; or.”

The STS bases for LCO 3.4.12.b state that autoclosure interlocks are not permitted to cause the RHR suction isolation valves to close. Since the proposed lift settings for the RHR suction relief valves are at a higher pressure than the RHR interlock described on Page 2-3, it is not clear whether the interlock for the two inlet isolation valves is bypassed or disabled while two RHR suction relief valves are used to meet LCO 3.4.12.b. Provide a more detailed description of the RHR interlock and its interaction, if any, to an LTOP system that is operating in accordance with proposed LCO 3.4.12.b.

4. Page 2-10 of Attachment 2 describes the results of the analyses of the reactor coolant pump (RCPs) operating restrictions for LTOP. Specifically, with the power operated relief valves (PORVs) providing overpressure protection, the number of RCPs is restricted to two RCPs on Unit 1 and one RCP on Unit 2 at RCS temperatures $\geq 70^{\circ}\text{F}$ (with instrument uncertainty). With the RHR relief valves providing overpressure protection, the number of RCPs is restricted to four RCPs on Units 1 and 2 at RCS temperature $\geq 126^{\circ}\text{F}$ and 140°F (with instrument uncertainty), respectively. These values are presented on TS Table 3.4.12-1. However, there is no indication to the reader of TS Table 3.4.12-1 regarding those values that apply to each method of overpressure protection (PORV or RHR relief valves). Revise TS Table 3.4.12-1 appropriately or provide an explanation as to why further clarification of TS Table 3.4.12-1 is not necessary.

Catawba Nuclear Station

cc:

Mr. Gary Gilbert
Regulatory Compliance Manager
Duke Energy Corporation
4800 Concord Road
York, South Carolina 29745

Ms. Lisa F. Vaughn
Duke Energy Corporation
Mail Code - PB05E
422 South Church Street
P.O. Box 1244
Charlotte, North Carolina 28201-1244

Anne Cottingham, Esquire
Winston and Strawn
1400 L Street, NW
Washington, DC 20005

North Carolina Municipal Power
Agency Number 1
1427 Meadowood Boulevard
P. O. Box 29513
Raleigh, North Carolina 27626

County Manager of York County
York County Courthouse
York, South Carolina 29745

Piedmont Municipal Power Agency
121 Village Drive
Greer, South Carolina 29651

Ms. Karen E. Long
Assistant Attorney General
North Carolina Department of Justice
P. O. Box 629
Raleigh, North Carolina 27602

NCEM REP Program Manager
4713 Mail Service Center
Raleigh, NC 27699-4713

North Carolina Electric Membership
Corporation
P. O. Box 27306
Raleigh, North Carolina 27611

Senior Resident Inspector
U.S. Nuclear Regulatory Commission
4830 Concord Road
York, South Carolina 29745

Henry Porter, Assistant Director
Division of Waste Management
Bureau of Land and Waste Management
Department of Health and Environmental
Control
2600 Bull Street
Columbia, South Carolina 29201-1708

Mr. C. Jeffrey Thomas
Manager - Nuclear Regulatory
Licensing
Duke Energy Corporation
526 South Church Street
Charlotte, North Carolina 28201-1006

Saluda River Electric
P. O. Box 929
Laurens, South Carolina 29360

Mr. Peter R. Harden, IV
VP-Customer Relations and Sales
Westinghouse Electric Company
6000 Fairview Road
12th Floor
Charlotte, North Carolina 28210

Catawba Nuclear Station

cc:

Mr. T. Richard Puryear
Owners Group (NCEMC)
Duke Energy Corporation
4800 Concord Road
York, South Carolina 29745

Richard M. Fry, Director
Division of Radiation Protection
North Carolina Department of
Environment, Health, and
Natural Resources
3825 Barrett Drive
Raleigh, North Carolina 27609-7721