

December 15, 2003

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555-0001

Subject: Duke Energy Corporation  
Catawba Nuclear Station, Units 1 and 2  
Docket Nos. 50-413 and 50-414  
Technical Specification Bases Changes

Pursuant to 10CFR 50.4, please find attached changes to the Catawba Nuclear Station Technical Specification Bases. These Bases changes were made according to the provisions of 10CFR 50.59.

Any questions regarding this information should be directed to L. J. Rudy, Regulatory Compliance, at (803) 831-3084.

I certify that I am a duly authorized officer of Duke Energy Corporation and that the information contained herein accurately represents changes made to the Technical Specification Bases since the previous submittal.



Dhiaa M. Jamil

Attachment

A001

U.S. Nuclear Regulatory Commission  
December 15, 2003  
Page 2

xc: L. A. Reyes, Regional Administrator  
U.S. Nuclear Regulatory Commission, Region II

S. E. Peters, Project Manager  
U.S. Nuclear Regulatory Commission  
Office of Nuclear Reactor Regulation, Mail Stop 0-8-G9

E. G. Guthrie  
Senior Resident Inspector  
Catawba Nuclear Station



A Duke Energy Company

DUKE POWER  
Catawba Nuclear Station  
4800 Concord Rd.  
York, SC 29745

803 831 3000

December 15, 2003

Re: Catawba Nuclear Station  
Technical Specifications (TS) Manual

Please replace the corresponding pages in your copy of the Catawba Technical Specifications Manual as follows:

**REMOVE THESE PAGES**

**INSERT THESE PAGES**

**List of Effective Pages**

Pages 12, 15, 17, 21, 31

Pages 12, 15, 17, 21, 31

**Tab 3.0**

**B 3.0-3 - B 3.0-8**

**B 3.0-3 - B 3.0-8**

If you have any questions concerning the contents of this Technical Specification update, contact Jill Ferguson at (803) 831-3938.

  
for Lee Keller  
Manager, Regulatory Compliance

Page Number	Amendment	Revision Date
5.6-5	199/192	7/2/02
5.6-6	173/165	9/30/98
5.7-1	173/165	9/30/98
5.7-2	173/165	9/30/98

#### **BASES**

i	Revision 1	4/08/99
ii	Revision 0	9/30/98
iii	Revision 0	9/30/98
B 2.1.1-1	Revision 0	9/30/98
B 2.1.1-2	Revision 0	9/30/98
B 2.1.1-3	Revision 0	9/30/98
B 2.1.1-4	Revision 0	9/30/98
B 2.1.2-1	Revision 0	9/30/98
B 2.1.2-2	Revision 0	9/30/98
B 2.1.2-3	Revision 0	9/30/98
B 3.0-1	Revision 0	9/30/98
B 3.0-2	Revision 0	9/30/98
B 3.0-3	Revision 1	12/11/03
B 3.0-4	Revision 1	12/11/03
B 3.0-5	Revision 1	12/11/03
B 3.0-6	Revision 0	9/30/98
B 3.0-7	Revision 0	9/30/98
B 3.0-8	Revision 1	12/11/03
B 3.0-9	Revision 0	9/30/98
B 3.0-10	Revision 1	7/31/01
B 3.0-11	Revision 1	8/01/02
B 3.0-12	Revision 1	8/01/02
B 3.0-13	Revision 1	8/01/02
B 3.0-14	Revision 1	8/01/02
B 3.1.1-1	Revision 0	9/30/98
B 3.1.1-2	Revision 0	9/30/98

Page Number	Amendment	Revision Date
B 3.2.2-8	Revision 1	3/01/00
B 3.2.2-9	Revision 2	3/01/00
B 3.2.2-10	Revision 1	3/01/00
B 3.2.3-1	Revision 0	9/30/98
B 3.2.3-2	Revision 0	9/30/98
B 3.2.3-3	Revision 0	9/30/98
B 3.2.3-4	Revision 1	10/01/02
B 3.2.4-1	Revision 1	10/02/00
B 3.2.4-2	Revision 1	2/26/99
B 3.2.4-3	Revision 0	9/30/98
B 3.2.4-4	Revision 0	9/30/98
B 3.2.4-5	Revision 1	2/26/99
B 3.2.4-6	Revision 1	11/5/03
B 3.2.4-7	Revision 1	11/5/03
B 3.3.1-1	Revision 1	8/13/99
B 3.3.1-2	Revision 1	8/13/99
B 3.3.1-3	Revision 0	9/30/98
B 3.3.1-4	Revision 1	8/13/99
B 3.3.1-5	Revision 0	9/30/98
B 3.3.1-6	Revision 0	9/30/98
B 3.3.1-7	Revision 0	9/30/98
B 3.3.1-8	Revision 0	9/30/98
B 3.3.1-9	Revision 0	9/30/98
B 3.3.1-10	Revision 1	2/26/02
B 3.3.1-11	Revision 0	9/30/98
B 3.3.1-12	Revision 0	9/30/98
B 3.3.1-13	Revision 0	9/30/98
B 3.3.1-14	Revision 0	9/30/98
B 3.3.1-15	Revision 0	9/30/98
B 3.3.1-16	Revision 0	9/30/98
B 3.3.1-17	Revision 0	9/30/98
B 3.3.1-18	Revision 1	3/01/00

Page Number	Amendment	Revision Date
B 3.3.1-51	Revision 1	4/22/02
B 3.3.2-1	Revision 0	9/30/98
B 3.3.2-2	Revision 1	8/13/99
B 3.3.2-3	Revision 1	8/13/99
B 3.3.2-4	Revision 0	9/30/98
B 3.3.2-5	Revision 0	9/30/98
B 3.3.2-6	Revision 0	9/30/98
B 3.3.2-7	Revision 0	9/30/98
B 3.3.2-8	Revision 0	9/30/98
B 3.3.2-9	Revision 0	9/30/98
B 3.3.2-10	Revision 0	9/30/98
B 3.3.2-11	Revision 0	9/30/98
B 3.3.2-12	Revision 0	9/30/98
B 3.3.2-13	Revision 0	9/30/98
B 3.3.2-14	Revision 1	2/26/99
B 3.3.2-15	Revision 0	9/30/98
B 3.3.2-16	Revision 0	9/30/98
B 3.3.2-17	Revision 0	9/30/98
B 3.3.2-18	Revision 1	11/5/03
B 3.3.2-19	Revision 2	11/5/03
B 3.3.2-20	Revision 2	11/5/03
B 3.3.2-21	Revision 2	11/5/03
B 3.3.2-22	Revision 2	11/5/03
B 3.3.2-23	Revision 2	11/5/03
B 3.3.2-24	Revision 1	9/10/03
B 3.3.2-25	Revision 1	9/10/03
B 3.3.2-26	Revision 1	9/10/03
B 3.3.2-27	Revision 1	9/10/03
B 3.3.2-28	Revision 1	9/10/03
B 3.3.2-29	Revision 1	9/10/03
B 3.3.2-30	Revision 1	9/10/03
B 3.3.2-31	Revision 1	8/13/99

Page Number	Amendment	Revision Date
B 3.4.8-2	Revision 2	7/29/03
B 3.4.8-3	Revision 2	7/29/03
B 3.4.9-1	Revision 0	9/30/98
B 3.4.9-2	Revision 0	9/30/98
B 3.4.9-3	Revision 0	9/30/98
B 3.4.9-4	Revision 1	4/27/99
B 3.4.10-1	Revision 0	9/30/98
B 3.4.10-2	Revision 0	9/30/98
B 3.4.10-3	Revision 0	9/30/98
B 3.4.10-4	Revision 0	9/30/98
B 3.4.11-1	Revision 0	9/30/98
B 3.4.11-2	Revision 1	11/5/03
B 3.4.11-3	Revision 1	11/5/03
B 3.4.11-4	Revision 1	11/5/03
B 3.4.11-5	Revision 0	9/30/98
B 3.4.11-6	Revision 0	9/30/98
B 3.4.11-7	Revision 0	9/30/98
B 3.4.12-1	Revision 0	9/30/98
B 3.4.12-2	Revision 0	9/30/98
B 3.4.12-3	Revision 0	9/30/98
B 3.4.12-4	Revision 0	9/30/98
B 3.4.12-5	Revision 0	9/30/98
B 3.4.12-6	Revision 0	9/30/98
B 3.4.12-7	Revision 0	9/30/98
B 3.4.12-8	Revision 0	9/30/98
B 3.4.12-9	Revision 0	9/30/98
B 3.4.12-10	Revision 0	9/30/98
B 3.4.12-11	Revision 0	9/30/98
B 3.4.13-1	Revision 0	9/30/98
B 3.4.13-2	Revision 0	9/30/98
B 3.4.13-3	Revision 0	9/30/98
B 3.4.13-4	Revision 0	9/30/98

Page Number	Amendment	Revision Date
B 3.8.4-2	Revision 1	2/26/99
B 3.8.4-3	Revision 0	9/30/98
B 3.8.4-4	Revision 1	4/27/99
B 3.8.4-5	Revision 1	2/18/02
B 3.8.4-6	Revision 2	11/5/03
B 3.8.4-7	Revision 5	11/5/03
B 3.8.4-8	Revision 3	11/5/03
B 3.8.4-9	Revision 4	11/5/03
B 3.8.4-10	Revision 0	11/5/03
B 3.8.5-1	Revision 0	9/30/98
B 3.8.5-2	Revision 2	7/29/03
B 3.8.5-3	Revision 1	7/29/03
B 3.8.6-1	Revision 0	9/30/98
B 3.8.6-2	Revision 0	9/30/98
B 3.8.6-3	Revision 0	9/30/98
B 3.8.6-4	Revision 0	9/30/98
B 3.8.6-5	Revision 0	9/30/98
B 3.8.6-6	Revision 0	9/30/98
B 3.8.6-7	Revision 0	9/30/98
B 3.8.7-1	Revision 0	9/30/98
B 3.8.7-2	Revision 0	9/30/98
B 3.8.7-3	Revision 1	2/26/99
B 3.8.8-1	Revision 0	9/30/98
B 3.8.8-2	Revision 0	9/30/98
B 3.8.8-3	Revision 2	7/29/03
B 3.8.8-4	Revision 0	7/29/03
B 3.8.9-1	Revision 0	9/30/98
B 3.8.9-2	Revision 0	9/30/98
B 3.8.9-3	Revision 0	9/30/98
B 3.8.9-4	Revision 0	9/30/98
B 3.8.9-5	Revision 0	9/30/98
B 3.8.9-6	Revision 0	9/30/98
B 3.8.9-7	Revision 0	9/30/98



**BASES**

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**LCO 3.0.3 (continued)**

corresponds to the actual condition of the unit. Sometimes, possible combinations of Conditions are such that entering LCO 3.0.3 is warranted; in such cases, the ACTIONS specifically state a Condition corresponding to such combinations and also that LCO 3.0.3 be entered immediately.

This Specification delineates the time limits for placing the unit in a safe MODE or other specified condition when operation cannot be maintained within the limits for safe operation as defined by the LCO and its ACTIONS. It is not intended to be used as an operational convenience that permits routine voluntary removal of redundant systems or components from service in lieu of other alternatives that would not result in redundant systems or components being inoperable.

Upon entering LCO 3.0.3, 1 hour is allowed to prepare for an orderly shutdown before initiating a change in unit operation. This includes time to permit the operator to coordinate the reduction in electrical generation with the load dispatcher to ensure the stability and availability of the electrical grid. The LCO phrase, "Action shall be initiated within 1 hour..." does not mean that an actual change in load must be commenced by the end of the 1-hour period (Reference 1). The action initiated at the end of the 1-hour period may be administrative in nature, such as preparing shutdown procedures. If at the end of 1 hour, corrective measures which would allow exiting LCO 3.0.3 are not complete, but there is reasonable assurance that they will be completed with enough time remaining to still allow for an orderly unit shutdown, if required, commencing a load decrease may be delayed until that time. The time limits specified to reach lower MODES of operation permit the shutdown to proceed in a controlled and orderly manner that is well within the specified maximum cooldown rate and within the capabilities of the unit, assuming that only the minimum required equipment is OPERABLE. This reduces thermal stresses on components of the Reactor Coolant System and the potential for a plant upset that could challenge safety systems under conditions to which this Specification applies. The use and interpretation of specified times to complete the actions of LCO 3.0.3 are consistent with the discussion of Section 1.3, Completion Times.

A unit shutdown required in accordance with LCO 3.0.3 may be terminated and LCO 3.0.3 exited if any of the following occurs:

- a. The LCO is now met.
- b. A Condition exists for which the Required Actions have now been performed.

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BASES

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LCO 3.0.3 (continued)

- c. ACTIONS exist that do not have expired Completion Times. These Completion Times are applicable from the point in time that the Condition is initially entered and not from the time LCO 3.0.3 is exited.

The time limits of Specification 3.0.3 allow 37 hours for the unit to be in MODE 5 when a shutdown is required during MODE 1 operation. If the unit is in a lower MODE of operation when a shutdown is required, the time limit for reaching the next lower MODE applies. If a lower MODE is reached in less time than allowed, however, the total allowable time to reach MODE 5, or other applicable MODE, is not reduced. For example, if MODE 3 is reached in 2 hours, then the time allowed for reaching MODE 4 is the next 11 hours, because the total time for reaching MODE 4 is not reduced from the allowable limit of 13 hours. Therefore, if remedial measures are completed that would permit a return to MODE 1, a penalty is not incurred by having to reach a lower MODE of operation in less than the total time allowed.

In MODES 1, 2, 3, and 4, LCO 3.0.3 provides actions for Conditions not covered in other Specifications. The requirements of LCO 3.0.3 do not apply in MODES 5 and 6 because the unit is already in the most restrictive Condition required by LCO 3.0.3. The requirements of LCO 3.0.3 do not apply in other specified conditions of the Applicability (unless in MODE 1, 2, 3, or 4) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.

Exceptions to LCO 3.0.3 are provided in instances where requiring a unit shutdown, in accordance with LCO 3.0.3, would not provide appropriate remedial measures for the associated condition of the unit. An example of this is in LCO 3.7.14, "Spent Fuel Pool (SFP) Water Level."

LCO 3.7.14 has an Applicability of "During movement of irradiated fuel assemblies in the spent fuel pool." Therefore, this LCO can be applicable in any or all MODES. If the LCO and the Required Actions of LCO 3.7.14 are not met while in MODE 1, 2, or 3, there is no safety benefit to be gained by placing the unit in a shutdown condition. The Required Action of LCO 3.7.14 of "Suspend movement of irradiated fuel assemblies in the spent fuel pool" is the appropriate Required Action to complete in lieu of the actions of LCO 3.0.3. These exceptions are addressed in the individual Specifications.

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LCO 3.0.4

LCO 3.0.4 establishes limitations on changes in MODES or other specified conditions in the Applicability when an LCO is not met. It precludes placing the unit in a MODE or other specified condition stated in that Applicability (e.g., Applicability desired to be entered) when the following exist:

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**BASES**

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**LCO 3.0.4 (continued)**

- a. Unit conditions are such that the requirements of the LCO would not be met in the Applicability desired to be entered; and
- b. Continued noncompliance with the LCO requirements, if the Applicability were entered, would result in the unit being required to exit the Applicability desired to be entered to comply with the Required Actions.

Compliance with Required Actions that permit continued operation of the unit for an unlimited period of time in a MODE or other specified condition provides an acceptable level of safety for continued operation. This is without regard to the status of the unit before or after the MODE change. Therefore, in such cases, entry into a MODE or other specified condition in the Applicability may be made in accordance with the provisions of the Required Actions. The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

The provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS.

Exceptions to LCO 3.0.4 are stated in the individual Specifications. The exceptions allow entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered do not provide for continued operation for an unlimited period of time. Exceptions may apply to all the ACTIONS or to a specific Required Action of a Specification.

Surveillances do not have to be performed on the associated inoperable equipment (or on variables outside the specified limits), as permitted by SR 3.0.1. Therefore, changing MODES or other specified conditions while in an ACTIONS Condition, in compliance with LCO 3.0.4 or where an exception to LCO 3.0.4 is stated, is not a violation of SR 3.0.1 or SR 3.0.4 for those Surveillances that do not have to be performed due to the associated inoperable equipment. However, SRs must be met to ensure OPERABILITY prior to declaring the associated equipment OPERABLE (or variable within limits) and restoring compliance with the affected LCO.

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**LCO 3.0.5**

LCO 3.0.5 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The sole purpose of this Specification is to provide an exception to LCO 3.0.2 (e.g., to not comply

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**BASES**

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**LCO 3.0.5 (continued)**

with the applicable Required Action(s)) to allow the performance of SRs to demonstrate:

- a. The OPERABILITY of the equipment being returned to service; or
- b. The OPERABILITY of other equipment.

The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTIONS is limited to the time absolutely necessary to perform the allowed SRs. This Specification does not provide time to perform any other preventive or corrective maintenance.

An example of demonstrating the OPERABILITY of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply with Required Actions and must be reopened to perform the SRs.

An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of an SR on another channel in the other trip system. A similar example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of an SR on another channel in the same trip system.

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**LCO 3.0.6**

LCO 3.0.6 establishes an exception to LCO 3.0.2 for support systems that have an LCO specified in the Technical Specifications (TS). This exception is provided because LCO 3.0.2 would require that the Conditions and Required Actions of the associated inoperable supported system LCO be entered solely due to the inoperability of the support system. This exception is justified because the actions that are required to ensure the unit is maintained in a safe condition are specified in the support system LCO's Required Actions. These Required Actions may include entering the supported system's Conditions and Required Actions or may specify other Required Actions.

When a support system is inoperable and there is an LCO specified for it in the TS, the supported system(s) are required to be declared inoperable if determined to be inoperable as a result of the support system inoperability. However, it is not necessary to enter into the supported systems' Conditions and Required Actions unless directed to do so by the

**BASES**

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**LCO 3.0.6 (continued)**

support system's Required Actions. The potential confusion and inconsistency of requirements related to the entry into multiple support and supported systems' LCOs' Conditions and Required Actions are eliminated by providing all the actions that are necessary to ensure the unit is maintained in a safe condition in the support system's Required Actions.

However, there are instances where a support system's Required Action may either direct a supported system to be declared inoperable or direct entry into Conditions and Required Actions for the supported system. This may occur immediately or after some specified delay to perform some other Required Action. Regardless of whether it is immediate or after some delay, when a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

Specification 5.5.15, "Safety Function Determination Program (SFDP)," ensures loss of safety function is detected and appropriate actions are taken. Upon entry into LCO 3.0.6, an evaluation shall be made to determine if loss of safety function exists. Additionally, other limitations, remedial actions, or compensatory actions may be identified as a result of the support system inoperability and corresponding exception to entering supported system Conditions and Required Actions. The SFDP implements the requirements of LCO 3.0.6.

Cross train checks to identify a loss of safety function for those support systems that support multiple and redundant safety systems are required. The cross train check verifies that the supported systems of the redundant OPERABLE support system are OPERABLE, thereby ensuring safety function is retained. If this evaluation determines that a loss of safety function exists, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

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**LCO 3.0.7**

There are certain special tests and operations required to be performed at various times over the life of the unit. These special tests and operations are necessary to demonstrate select unit performance characteristics, to perform special maintenance activities, and to perform special evolutions. Test Exception LCOs 3.1.8 and 3.4.17 allow specified Technical Specification (TS) requirements to be changed to permit

## BASES

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### LCO 3.07 (continued)

performances of these special tests and operations, which otherwise could not be performed if required to comply with the requirements of these TS. Unless otherwise specified, all the other TS requirements remain unchanged. This will ensure all appropriate requirements of the MODE or other specified condition not directly associated with or required to be changed to perform the special test or operation will remain in effect.

The Applicability of a Test Exception LCO represents a condition not necessarily in compliance with the normal requirements of the TS. Compliance with Test Exception LCOs is optional. A special operation may be performed either under the provisions of the appropriate Test Exception LCO or under the other applicable TS requirements. If it is desired to perform the special operation under the provisions of the Test Exception LCO, the requirements of the Test Exception LCO shall be followed.

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### LCO 3.0.8

LCO 3.0.8 delineates the applicability of each specification to Unit 1 and Unit 2 operations.

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### REFERENCES

1. Letter from Christopher I. Grimes, Chief, Technical Specifications Branch, Division of Operating Reactor Support, to Frederick J. Hebdon, Director, Project Directorate II-4, Division of Reactor Projects I/II, "Use of Shutdown Times for Corrective Maintenance (TIA 92-08)," December 11, 1992.