



D.M. JAMIL
Vice President

Duke Power
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November 15, 2005

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

Subject: Duke Energy Corporation
Catawba Nuclear Station, Units 1 and 2
Docket Numbers 50-413 and 50-414
Proposed Technical Specification Amendment
Technical Specification 3.5.2, Emergency Core
Cooling System; 3.6.6, Containment Spray System;
3.6.17, Containment Valve Injection Water System;
3.7.5, Auxiliary Feedwater System; 3.7.7,
Component Cooling Water System; 3.7.8, Nuclear
Service Water System; 3.7.10, Control Room Area
Ventilation System; 3.7.12, Auxiliary Building
Filtered Ventilation Exhaust System; & 3.8.1, AC
Sources - Operating

References: Letters from Duke Energy Corporation to NRC,
same subject, dated November 16, 2004, May 3,
2005, July 6, 2005, September 13, 2005,
October 6, 2005, and October 24, 2005

The reference letters collectively comprise Duke Energy Corporation's license amendment request submittal to allow the "A" and "B" Nuclear Service Water System (NSWS) headers for each unit to be taken out of service for up to 14 days each for system upgrades.

On November 8, 2005, a telephone conversation was held between Duke Energy Corporation personnel and NRC staff concerning the final compilation of licensee commitments associated with this request. At the conclusion of this conversation, Duke Energy Corporation indicated that a final letter would be provided to collectively compile all of the commitments previously made in the reference correspondence. The attachment to this letter constitutes this compilation.

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U.S. Nuclear Regulatory Commission

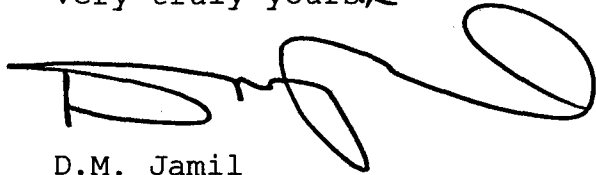
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Pursuant to 10 CFR 50.91, a copy of this letter is being sent to the appropriate State of South Carolina official.

Inquiries on this matter should be directed to L.J. Rudy at (803) 831-3084.

Very truly yours,


A handwritten signature in black ink, appearing to read 'D.M. Jamil', with a large, stylized loop at the end.

D.M. Jamil

LJR/s

Attachment

D.M. Jamil affirms that he is the person who subscribed his name to the foregoing statement, and that all the matters and facts set forth herein are true and correct to the best of his knowledge.


D.M. Jamil, Vice President

Subscribed and sworn to me: _____

11/15/05

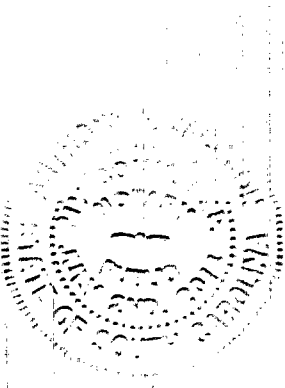
Date


Notary Public

My commission expires: _____

7/2/2014

Date



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xc (with attachment):

W.D. Travers
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H.J. Porter
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bxc (with attachment):

D.M. Jamil (CN01VP)
J.W. Pitesa (CN01SM)
R.T. Repko (CN01EG)
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R.D. Hart (CN01RC)
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K.E. Nicholson (CN01RC)
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L.B. Jones (EC05O)
G.F. Winkel (EC05P)

NCMPA-1

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PMPA

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CATAWBA LIST OF REGULATORY COMMITMENTS

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The following regulatory commitments will be entered into the Catawba regulatory commitment tracking program:

1. The proposed changes to the Catawba TS will be implemented within 60 days of NRC approval.
2. During each 14-day period when operating with only one operable NSWS header, no major maintenance or testing will be planned on the remaining operable NSWS header. In addition, during each 14-day period, no major maintenance or testing will be planned on the operable equipment that relies upon NSWS as a support system. To the maximum extent practicable, routine tests (e.g., quarterly pump tests) and preventive maintenance work (e.g., motor checks) will be scheduled prior to or following each 14-day period. Certain tests may have to be performed during each 14-day period.
3. Diesel Generator Jacket Water Heat Exchanger - A temporary Engineering Change will be installed on each train of EDGs on both units to maintain the technically inoperable EDG capable of being manually started while the normal NSWS supply piping is out of service. This will be accomplished by using water from the fire protection system.
4. Diesel Generator Starting Air - An Engineering Change will be installed on each train of EDGs on both units to maintain the cooling water to the EDG starting air system aftercoolers while the normal NSWS supply piping is out of service. This will be accomplished by using drinking water to supply the aftercooler. This cooling water flow rate is adequate to maintain the non-safety related function of the starting air compressors.
5. No major maintenance or testing will be planned on the operable offsite power sources during each 14-day period. Switchyard activities will be coordinated to ensure that the operable offsite power supply and main transformer on both units are protected to the maximum extent practicable.
6. Appropriate training will be provided to Operations personnel on this TS change, contingency measures to be implemented during each 14-day period, and actions to be taken in the event of flooding in the turbine building. Also, Operations will review the loss of NSWS and loss of CCW procedures as well as perform extra rounds on the CCW system.

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7. During each 14-day period, no major maintenance or testing will be planned on the SSF. To the maximum extent practicable, routine tests and preventive maintenance work for the SSF will be scheduled prior to or following each 14-day period.
8. During each 14-day period, no major maintenance or testing will be planned on the operable trains of ECCS, CSS, CVIWS, AFW, CCW, CRAVS, ABFVES, and EDG. Routine tests and preventive maintenance work for these systems will be scheduled prior to or following each 14-day period. These items are being done to ensure the operable trains are protected to the maximum extent practicable.
9. During each 14-day period that a NSWS header is out of service, the operable trains remaining in service will be considered protected trains. Operations will increase their routine monitoring of these trains to help ensure their operability. This increase in routine monitoring will also include the turbine building to ensure no flooding in this area.
10. Plant procedures will be used to cross tie selected CCW system loads during the time period a CCW heat exchanger will be out of service during each NSWS header outage.
11. Catawba has installed permanent flood protection barriers in the turbine building to mitigate turbine building flooding. In addition, to help reduce any potential flooding issues, no major maintenance or testing will be planned on the Condenser Circulating Water System. Operators will also review actions to be taken in the event of flooding in the turbine building.
12. An action taken by Catawba to reduce the likelihood of an operator failing to get to the SSF and performing the required actions is to station an individual in the SSF continuously. This individual is trained on how to operate the SSF diesel generator and the standby makeup pump to establish an alternate method of reactor coolant pump seal injection. This will provide additional assurance that the SSF will be available during each NSWS header outage.
13. To mitigate the risk of a potential core damage event, two separate operator actions have been identified that either are or will be incorporated into existing plant procedures. The first involves dispatching operators

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to throttle key AFW valves to supply the flow to the steam generators prior to the depletion of the vital batteries, thereby preventing steam generator overfill and thus protecting the steam supplies to the AFW turbine driven pump. The second involves the CCW system in cross-train alignment, where if the operable 4160 VAC bus is lost, operators would be instructed to align the available CCW pumps in the maintenance train through the CCW heat exchanger corresponding to the train without power. This will provide cooling to a CCW essential header.

14. No major maintenance or testing will be planned on the portions of the fire protection system and drinking water system that are relied upon to provide backup cooling to the EDGs and the "A" charging pumps.
15. Catawba will monitor the National Weather Service reports prior to and throughout the NSWS outages to ensure, to the maximum extent practicable, that any potential outbreaks of severe weather are factored into the schedule, and if severe weather should occur, that appropriate personnel are notified and appropriate actions are taken. If either sustained high winds (greater than 50 miles per hour for greater than 15 minutes) or ice accumulation (greater than .25 inch) is forecast to occur during the planned NSWS outage periods, then implementation of the planned outage would be delayed until such time that favorable weather conditions are forecast.

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List of acronymns:

NSWS	Nuclear Service Water System
EDG	Emergency Diesel Generator
CCW	Component Cooling Water
SSF	Standby Shutdown Facility
ECCS	Emergency Core Cooling System
CSS	Containment Spray System
CVIWS	Containment Valve Injection Water System
AFW	Auxiliary Feedwater
CRAVS	Control Room Area Ventilation System
ABFVES	Auxiliary Building Filtered Ventilation Exhaust System