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DUKE POWER

October 5, 1993

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

Subject: Catawba Nuclear Station, Unit 1
Docket No. 50-413
Technical Specification Amendment
Renewal Of Steam Generator Tube Interim Plugging Criteria for Unit 1 Cycle 8

Attached are proposed changes to the Catawba Nuclear Station Technical Specifications requesting renewal of the voltage based steam generator tube interim plugging criteria for Unit 1, which was approved for Cycle 7 operation, for use during Cycle 8. Some additional changes to the previous Tech Spec are being made to reflect guidance given in draft NUREG-1477 and updated information which was added to the EPRI 3/4 inch steam generator tube data base.

Catawba will need approval of these changes prior to startup following the End-Of-Cycle 7 refueling outage which is scheduled to begin October 30, 1993. Specifically, approval will be needed prior to entry into Mode 4 on the return to power since this is when the steam generators must be operable. Therefore, it is requested that this submittal receive timely review and approval in order to meet the schedule for the Catawba Unit 1, Cycle 8 startup. Startup is currently scheduled for December 24, 1993.

The marked up Technical Specification pages are given on Attachment 1. Attachment 2 contains the Technical Justification for these changes, and Attachment 3 contains the No Significant Hazards Analysis and Environmental Impact Statement.

Enclosed is WCAP-13854, "Technical Support For Cycle 8 Steam Generator Tube Interim Plugging Criteria For Catawba Unit 1", which presents main steam line leakage calculations consistent with draft NUREG-1477. This report updates information submitted under WCAP-13494, Rev. 1, which provided the technical basis for implementing an interim plugging criteria for Cycle 7.

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Enclosed as Attachment 4 are:

1. 3 copies of WCAP-13854, "Technical Support for Cycle 8 Steam Generator Interim Plugging Criteria for Catawba Unit 1" (Proprietary).

2. 6 copies of WCAP-13855, "Technical Support for Cycle 8 Steam Generator Interim Plugging Criteria for Catawba Unit 1" (Non-Proprietary).

Included in Attachment 4 are a Westinghouse authorization letter, CAW-93-522, an accompanying affidavit, a Proprietary Information Notice, and a Copyright Notice.

As item 1 above contains information proprietary to Westinghouse Electric Corporation, it is supported by an affidavit signed by Westinghouse, the owner of the information. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of 10 CFR Section 2.790 of the Commission's regulations.

Accordingly, it is respectfully requested that the information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR Section 2.790 of the Commission's regulations.

Correspondence with respect to the copyright or proprietary aspects of the items listed above or the supporting Westinghouse Affidavit should reference CAW-93-522 and should be addressed to Nicholas J. Liparulo, Manager of Nuclear Safety and Regulatory Activities, Westinghouse Electric Corporation, P.O. Box 355, Pittsburgh, Pennsylvania 15230-0355.

In addition, enclosed as Attachment 5 is the Catawba offsite dose analysis engineering calculation and results which utilizes the value for steam line break steam generator tube leakage given in the enclosed WCAP. Attachment 5 contains proprietary models, equations, calculations and discussions which develop an alternative methodology for demonstrating that offsite dose analyses associated with a postulated main steam line break are within acceptable limits. Duke Power Company requests that this dose analysis calculation be withheld from public disclosure. This document contains information which constitutes "trade secrets and commercial or financial information obtained and developed by Duke Power Company which is privileged or confidential" and is therefore exempt from disclosure pursuant to Section 552 (b)(4) of the Freedom of Information Act, 5 U.S.C. § 552, as amended, and applicable NRC regulations (10 CFR 2.790 (a)(4) and (b)).

Duke Power Co. pany requests that the dose analysis calculation in Attachment 5 be withheld from public disclosure because it contains trade secrets and confidential commercial information, disclosure of which would result in substantial harm to Duke Power Company's competitive position and its ability to obtain technical information necessary to maximize the effectiveness of its nuclear operations. Duke Power Company believes that nondisclosure of this proprietary information would not detract from the ability of the public to be fully apprised as to the basis for and affects of this dose analysis calculation.

Included in Attachment 5 is the sworn declaration of D. L. Rehn, Site Vice-President, Catawba Nuclear Station, Duke Power Company which provides the basis for withholding from public disclosure the proprietary dose a:alysis calculation given in A"achment 5. Should the NRC deem it necessary to allow inspection of these materials by NRC contractor personnel who may be asked to review this request, Duke Power Company would be willing, in that limited instance, to supply a protective agreement under the terms of which the document could be so inspected.

In issuing draft NUREG-1477, the NRC staff recommended that licensees requesting approval of an interim plugging criteria provide certain information on various programs, procedures, and policies related to the implementation of an interim plugging criteria. Attachment 6 is Catawba Nuclear Station's response to the issues raised in this draft report.

Pursuant to 10 CFR 50.91 (b)(1), the appropriate South Carolina official is being provided a copy of this amendment request.

Very truly yours,

D. L. Rehn

Attachments

RKS/

xc: Mr. S. D. Ebneter
Regional Administrator, Region II
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D. L. Rehn, being duly sworn, states that he is Site Vice-President, Catawba Nuclear Station; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission this revision to the Catawba Nuclear Station Technical Specifications, Appendix A to License Nos. NPF-35 and NPF-52; and that all statements and matters set forth therein are true and correct to the best of his knowledge.

D. L. Rehn

Subscribed and sworn to before me this 5th day of Oct., 1993.

Notary Public

My Commission Expires:

Nov. 24, 2000

bxc: D. B. Mayes
Z. L. Taylor
J. S. Forbes
D. A. Wellbaum
R. C. Futrell
G. B. Swindlehurst
R. O. Sharpe
L. R. Davison
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