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July 26, 1983

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Ms. E. G. Adensam, Chief
Licensing Branch No. 4

Re: Catawba Nuclear Station
Docket Nos. 50-413 and 50-414

Dear Mr. Denton:

Section 15.4.6 of the Catawba Safety Evaluation Report provides a discussion of Confirmatory Item 41, ESF Grade Containment Purge Filter System Design. Attached are revised Catawba FSAR pages which respond to this item.

Very truly yours,

H. B. Tucker / HBT

Hal B. Tucker

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Attachment

cc: Mr. James P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
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NRC Resident Inspector
Catawba Nuclear Station

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TABLE 6.2.4-1

CONTAINMENT ISOLATION VALVE AND ACTUATOR DATA (PAGES 5)

Item Number	Service	Pen. No	(1,17)	Nominal Line Size Inches	Flow Direction Relative to Containment	(7) Seismic Connections		(5,15) Valve Number	(19) Valve Location	Type Valve & Size	(4,16)	(2,3) Actuation		(4) Valve Position			Post Shutdown Accident	FSAR Figure No	Vent And Drain For Type A Test	(18)	Justification For Not Testing
			Valve Arrangements			Inside	Outside				Type Actuator	Signal	Type	Normal	Failsafe	Type C Leakage Test					
67	Nuclear Service Wtr. to MC Pump and Lower Cont. Vent. Units	M240	B6	12	In	Yes	Yes	RN437B RN438	Outside Inside	Gate 12" Check 12"	E -	P -	A, R, M -	O O	AI -	O O	C C	9.2.1-6	Yes	Yes	----
68	Nuclear Service Wtr. from MC Pump and Lower Cont Vent Units	M230	A9	12	Out	Yes	Yes	RN404A RN407B RN405	Inside Outside Inside	Gate 12" Gate 12" Check 3/4"	E E -	P P -	A, R, M A, R, M -	O AI C	AI O -	O O C	C C C	9.2.1-7	Yes	Yes	----
69	Nuclear Service Wtr. to Upper Cont. Vent. Units	M305	B6	6	In	Yes	Yes	RN404B RN405	Outside Inside	Gate 6" Check 6"	E -	P -	A, R, M -	O O	AI -	O O	C C	9.2.1-7	Yes	Yes	----
70	Nuclear Service Wtr. from Upper Cont. Vent. Units	M308	A9	6	Out	Yes	Yes	RN429A RN432B RN430	Inside Outside Inside	Gate 6" Gate 6" Check 3/4"	E E -	P P -	A, R, M A, R, M -	O AI C	AI O -	O O C	C C C	9.2.1-6	Yes	Yes	----
71	Incore Instrumentation Re. Purge In	M213	A5	12	In	Yes	No	VP17A VP10B	Inside Outside	Butterfly 12" Butterfly 12"	D D	T (14) T (14)	A, R A, R	C LC	C C	C C	C C	9.4.5-1	No	Yes	----
72	Incore Instrumentation Re. Purge Out	M140	A5	12	Out	Yes	Yes	VP19A VP20B	Inside Outside	Butterfly 12" Butterfly 12"	D D	T (15) T (14)	A, R A, R	C LC	C C	C C	C C	9.4.5-1	No	Yes	----
73	Upper Compartment Purge Inlet	M456	A5	24	In	Yes	No	VP21B VP2A	Outside Inside	Butterfly 24" Butterfly 24"	D D	T (31) T (31)	A, R A, R	C C	C C	C C	C C	9.4.5-1	No	Yes	----
74	Upper Compartment Purge Inlet	M432	A5	24	In	Yes	No	VP3B VP4A	Outside Inside	Butterfly 24" Butterfly 24"	D D	T (31) T (31)	A, R A, R	C C	C C	C C	C C	9.4.5-1	No	Yes	----
75	Lower Compartment Purge Inlet	M357	A5	24	In	Yes	No	VP6B VP7A	Outside Inside	Butterfly 24" Butterfly 24"	D D	T (31) T (31)	A, R A, R	LC C	C C	C C	C C	9.4.5-1	No	Yes	----
76	Lower Compartment Purge Inlet	M434	A5	24	In	Yes	No	VP8C VP9A	Outside Inside	Butterfly 24" Butterfly 24"	D D	T (31) T (31)	A, R A, R	LC C	C C	C C	C C	9.4.5-1	No	Yes	----
77	Containment Purge Exhaust	M36A	A5	24	Out	Yes	Yes	VP10A VP11B	Inside Outside	Butterfly 24" Butterfly 24"	D D	T (31) T (31)	A, R A, R	C C	C C	C C	C C	9.4.5-1	No	Yes	----
78	Containment Purge Exhaust	M433	A5	24	Out	Yes	Yes	VP12C VP13B	Inside Outside	Butterfly 24" Butterfly 24"	D D	T (31) T (31)	A, R A, R	C C	C C	C C	C C	9.4.5-1	No	Yes	----
79	Containment Purge Exhaust	M119	A5	24	Out	Yes	Yes	VP15A VP16B	Inside Outside	Butterfly 24" Butterfly 24"	D D	T (31) T (31)	A, R A, R	C LC	C C	C C	C C	9.4.5-1	No	Yes	----
80	Steam Generator 10 Blowdown	M455	A7	4	Out	Yes	Yes	8B8A 8B10B 8B52	Inside Outside Inside	Gate 4" Gate 4" Check 3/4"	E E -	T T	A, R, M A, R, M	O AI C	AI O C	O O C	C C C	10.4.8-1	No	No	(23)
81	Steam Generator 1A Blowdown	M142	A7	4	Out	Yes	Yes	8B147B 8B56A 8B57B 8B53	Outside Inside Outside Inside	Globe 1" Gate 4" Gate 4" Check 3/4"	E E -	T T	A, R, M A, R, M	O AI C	AI O C	O O C	C C C	10.4.8-1	No	No	(23)
82	Steam Generator 1C Blowdown	M3105	A7	4	Out	Yes	Yes	8B148B 8B60A 8B61B 8B54	Outside Inside Outside Inside	Globe 1" Gate 4" Gate 4" Check 3/4"	E E -	T T	A, R, M A, R, M	O AI C	AI O C	O O C	C C C	10.4.8-1	No	No	(23)
83	Steam Generator 1B Blowdown	M277	A7	4	Out	Yes	Yes	8B149B 8B19A 8B21B 8B55 8B150B	Outside Inside Outside Inside Outside	Globe 1" Gate 4" Gate 4" Check 3/4" Globe 1"	E E -	T T	A, R, M A, R, M	O AI C	AI O C	O O C	C C C	10.4.8-1	No	No	(23)

TABLE 6.2.4-1 (Page 12)

Containment Isolation Valve and Actuator Data

22. During the injection phase of safety injection, these valves are closed. Water from the refueling water storage tank (FWST) provides approximately 48 feet of head on these valves (~ 20.8 psig). This head will preclude any leakage through this penetration. During the recirculation phase of safety injection, these valves are open to provide flow to ND pump suction.
23. The main steam, feedwater, auxiliary feedwater, sample and blowdown lines are all connected to the secondary side of the steam generator which is kept at a higher pressure than the primary side soon after a LOCA occurs. Any leakage between the primary and secondary sides of the steam generator is directed inward to the containment.
24. Deleted
25. Type C leak test not required by 10 CFR 50, Appendix J because these containment isolation valves:
 - a. Do not provide a direct connection between the inside and outside atmospheres of the primary reactor containment under normal operation.
 - b. Are not required to close automatically upon receipt of a containment isolation signal in response to controls intended to effect containment isolation, and
 - c. Are not required to operate intermittently under post accident conditions.

In addition, these penetrations have been evaluated per 10CFR50, Appendix J, III.A.d. It was concluded that testing was not required.
26. These valves are sealed against leakage by the Containment Valve Injection Water System as discussed in Section 6.2.4.4.
27. Type B test performed per 10 CFR 50, Appendix J.
28. Deleted
29. This system is required to be in operation during the Type A test in order to maintain the unit in a safe condition. Therefore, this penetration will not be vented and drained.
30. This penetration is a part of a closed system inside containment. All piping inside containment is seismic Category 1 and therefore not subject to rupture as a result of a LOCA. This penetration will not be drained and vented for the Type A test.
31. Valve closes on receipt of a high radiation or high relative humidity signal.

CNS

The containment purge supply fans, purge exhaust fans, and filter trains are controlled in two trains. The controls are designed to have simultaneous starting and stopping of the matching supply and exhaust equipment. The controls for the Incore Instrumentation Room Purge System are designed to have simultaneous starting and stopping of the supply and exhaust equipment. The controls are also designed to initiate an automatic shutdown, and containment isolation upon receipt of a containment isolation signal.

The containment purge exhaust system filter trains are described in Section 12.3.3.

9.4.5.3 Safety Evaluation

Each Containment Purge Ventilation System supply and exhaust penetration through the containment vessel is equipped with two normally closed isolation valves, each connected to separate control trains. A failure in one train will not prevent the remaining isolation valve from providing the required isolation capability. The isolation valves and containment penetrations are the only portions of the Containment Purge Ventilation System that are engineered safety features, and are discussed in Section 6.2.4. Design specifications for the purge system isolation valves are presented in Table 9.4.5-1.

The containment purge exhaust system is isolated on high radiation or high relative humidity signals. Relative humidity is controlled and monitored upstream of the containment purge exhaust filter trains. Electric preheaters maintain $\leq 70\%$ relative humidity.

Since containment purge system operation is intermittent, relative humidity is monitored in the vicinity of the carbon adsorbers. Carbon adsorbers are heated as necessary to maintain a suitable "storage" environment ($\leq 70\%$ relative humidity). High carbon adsorber bed relative humidity is alarmed.

A fuel handling accident inside the containment has been analyzed assuming the Purge System is in operation during refueling operations. This analysis is described in Section 15.7.4.

9.4.5.4 Inspection and Testing Requirements

The nonessential components are not normally in operation and are accessible for periodic inspection. Essential components and controls are tested during preoperational tests and periodically thereafter as required by the Technical Specifications.

Table 12.3.3-6 (Page 3)

Comparison of Containment Purge Filter System
With Regulatory Guide 1.52
Revision 2, March 1978

<u>Paragraph</u>	<u>Compliance Status</u>
C-3-k	Adsorber section design includes a manual water spray system. Single-failure criterion is not considered in its design.
C-3-l	In Compliance
C-3-m	In Compliance
C-3-n	1980 version of ANSI N509 is followed.
C-3-o	In Compliance
C-3-p	In compliance with the following clarification: 1980 version of ANSI N509 is followed.
C-4-a	In Compliance
C-4-b	Since all filter banks are arranged for external servicing, three feet of separation between filter banks is not necessary. Two and one half feet are provided for inspection purposes.
C-4-c	In Compliance
C-4-d	Containment purge system operation is Tech Spec limited.
C-4-e	In Compliance
C-5-a	In Compliance
C-5-b	In Compliance
C-5-c	In Compliance
C-5-d	In Compliance
C-6-a	In Compliance
C-6-b	In Compliance

Table 12.3.3-6 (Page 2)

Comparison of Containment Purge Filter System
With Regulatory Guide 1.52
Revision 2, March 1978

<u>Paragraph</u>	<u>Compliance Status</u>
C-2-g (continued)	locally. System discharge flow is recorded at the control room. Relative humidity is monitored prior to filtration and high humidity is alarmed.
C-2-h	Not applicable - the system is not designated as Class 1E electrical equipment except for its containment isolation functions.
C-2-i	The Containment Purge System operates continuously during the postulated fuel handling accident. The system is automatically isolated during the postulated LOCA.
C-2-j	Filter trains <u>will not</u> be removed as intact units. Gasketless filter adsorbers are used - which permits the fluidizing of carbon for external filling and removal. In this manner, we comply with ALARA recommendations.
C-2-k	In Compliance
C-2-l	In Compliance
C-3-a	System design does not include domisters.
C-3-b	Heaters are Seismic Category II.
C-3-c	Prefilters are tested in accordance with ASHRAE Standard 52.68 and carry UL Class 2 labels.
C-3-d	In Compliance
C-3-e	In Compliance
C-3-f	In Compliance
C-3-g	In Compliance
C-3-h	In Compliance
C-3-i	In Compliance
C-3-j	In Compliance

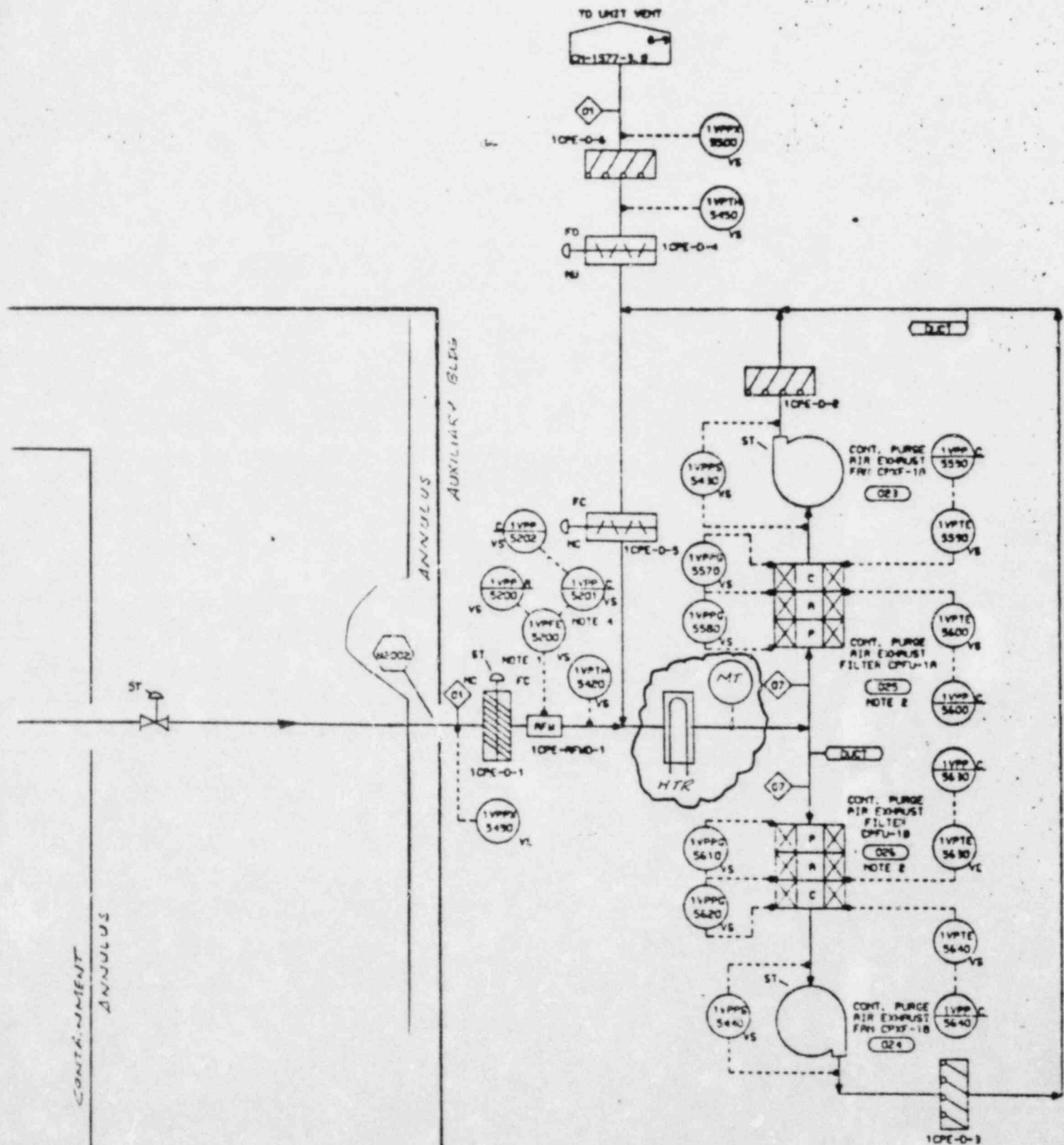
Table 12.3.3-6 (Page 1)

Comparison of Containment Purge Filter System
With Regulatory Guide 1.52
Revision 2, March 1978

<u>Paragraph</u>	<u>Compliance Status</u>
C-1-a	The Containment Purge Filter System is not an engineered safety feature. System design is based on normal plant operation and shut-down modes. System design does; however, ensure a safe release path from the containment in the event of a fuel handling accident inside containment with the purge system operating.
C-1-b	Regulatory Guides 1.3 and 1.4 do not apply as the Containment Purge System is Technical Specification limited such that a LOCA is not postulated while the system is in operation.
C-1-c	See paragraph c-1-b.
C-1-d	In Compliance
C-1-e	In Compliance
C-2-a	System design provides two (2) 50% capacity filter trains and fans. System design does not include domisters or HEPA filters downstream of the adsorbers. Heaters are used to control relative humidity prior to filtration.
C-2-b	See paragraph c-2-a.
C-2-c	In Compliance
C-2-d	The Containment Purge System is isolated during the pressure surge resulting from a postulated LOCA. The system is not required to operate during or after the postulated LOCA.
C-2-e	In Compliance
C-2-f	In Compliance
C-2-g	System instrumentation consists of local flow and pressure drop indication. System discharge flow is totalized and indicated

TABLE 12.3.3-5
 FILTER SYSTEM DESIGN PARAMETERS

<u>SYSTEM</u>	<u>CARBON BED (MINIMUM DEPTH, IN.)</u>	<u>HEATER SIZE (KW)</u>
Annulus Ventilation	2	45
Control Room Area Pressurizing	4	25
Fuel Handling Area Exhaust	2	80
Auxiliary Building Filtered Exhaust	2	30
Containment Purge Exhaust	2	100



CNS FSAR Figure 9.4.5.1
(PARTIAL PLAN)