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DUKE POWER

January 7, 1992

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

Subject: Catawba Nuclear Station
Docket No. 50-413, -414
Selected Licensee Commitments Manual (SLC)

Gentlemen:

Pursuant to 10 CFR 50.4 and 50.71, please find attached 7 copies of the latest revision dated 11/91 to the Catawba Selected Licensee Commitments Manual. The SLC Manual is Chapter 16.0 to the Catawba FSAR. This manual is meant to contain commitments and other station issues that we believe warrant higher control, but are not appropriate in the Technical Specifications (TS). Instead of being updated with the annual FSAR Update, the SLC Manual will be updated monthly as needed during the year.

Very truly yours,

A handwritten signature in cursive script that reads "M.S. Tuckman".

M.S. Tuckman

HAF/haf

Attachment

xc: S. D. Ebnetter
Regional Administrator, Region II

R. E. Martin, ONRR

W. T. Orders, Catawba

9201210117 920107
PDR ADOCK 05000413
K PDR

A handwritten signature in cursive script that reads "Aool".

January 3, 1992

RE: Catawba Nuclear Station
Selected Licensee Commitments
Effective 11/91

Please revise your copy of the Selected Licensee Commitments manual as follows:

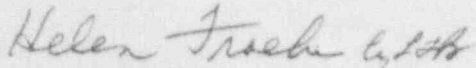
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16.2-2
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16.5-2
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If you have any questions or problems, I may be contacted at (704) 373-7720.


Helen Froebe
Nuclear Licensing Services

HAF/hf

DUKE POWER COMPANY
CATAWBA NUCLEAR STATION
SELECTED LICENCEE COMMITMENTS
MANUAL

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16.2 APPLICABILITY

This section provides the general requirements applicable to each of the COMMITMENTS and Testing requirements within Section 16.0, Selected Licensee Commitments (SLCs).

16.2.1 Compliance with the COMMITMENTS is required as specified. When a COMMITMENT is not met, the associated REMEDIAL ACTION(S) shall be met.

16.2.2 Noncompliance with a COMMITMENT exists when the requirements of both the COMMITMENT and the specified REMEDIAL ACTION are not met within the specified time. If compliance with a COMMITMENT is restored prior to expiration of the specified time interval, completion of the REMEDIAL ACTION(S) is not required.

16.2.3 Entry into an OPERATIONAL MODE or other specified condition shall not be made when the conditions for the COMMITMENT are not met and the associated REMEDIAL ACTION requires a shutdown if they are not met within a specified time interval. Entry into an OPERATIONAL MODE or specified condition may be made in accordance with the REMEDIAL ACTION requirements when conformance to them permits continued operation of the facility for an unlimited period of time. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with REMEDIAL ACTION requirements. Exceptions to these requirements are stated in the individual COMMITMENTS.

16.2.4 COMMITMENTS including the associated REMEDIAL ACTIONS shall apply to each unit individually unless otherwise indicated as follows:

- a. Whenever the COMMITMENT refers to systems or components which are shared by both units, the REMEDIAL ACTIONS will apply to both units simultaneously. This will be indicated in the REMEDIAL ACTIONS;
- b. Whenever the COMMITMENT applies to only one unit, this will be identified in the APPLICABILITY section of the COMMITMENT; and
- c. Whenever certain portions of a COMMITMENT contain operating parameters, setpoints, etc., which are different for each unit, this will be identified in parentheses or footnotes. (for example, "...flow rate of 54,000 cfm (Unit 1) or 43,000 cfm (Unit 2)...").

16.2.5 Testing Requirements shall be met during the OPERATION MODES or other conditions specified for an individual COMMITMENT unless otherwise stated in an individual Testing Requirement or Reference.

16.2.6 Each Testing Requirement shall be performed on its specified frequency with a maximum allowable extension not to exceed 25% of the test frequency. The phrase "at least" associated with a testing frequency does not negate this tolerance value, and permits the performance of more frequent testing activities. This tolerance is necessary to provide operational flexibility because of scheduling and performance considerations.

16.2.7 Under this criteria, equipment, systems or components are assumed to be OPERABLE if the associated Testing Requirements have been satisfactorily performed within the specified test frequency. Nothing in this provision is to be construed as defining equipment, systems or components OPERABLE, when such items are found or known to be inoperable although still meeting the Testing Requirements.

Failure to perform a Testing Requirement within the specified frequency shall constitute a failure to meet the OPERABILITY Requirements for a COMMITMENT. Exceptions to these requirements are stated in the individual COMMITMENTS. The time limits of the REMEDIAL ACTION requirements are applicable at the time it is identified that a Testing Requirement has not been performed. The REMEDIAL ACTION requirements may be delayed for up to 24 hours to permit the completion of the Testing Requirement when the allowable outage time limits the REMEDIAL ACTION requirements are less than 24 hours. Testing Procedures do not have to be performed on inoperable equipment.

16.2.8 During initial plant startup or following extended plant outages, the applicable testing activities must be performed within the stated test frequency prior to placing or returning the system or equipment to OPERABLE status.

Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Testing Requirement(s) associated with the COMMITMENT have been performed within the specified frequency.

16.2.9 Testing Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be applicable as follows:

- a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10CFR 50, Section 50.55a(g)(6)(i);
- b. Testing frequencies specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these

COMMITMENTS:

ASME Boiler and Pressure
Vessel Code and applicable
Addenda terminology for
inservice inspection and
testing activities

Required frequencies
for performing
inservice inspection
and testing activities

Weekly
Monthly
Quarterly or every 3 months
Semiannually or every 6
months
Every 9 months
Yearly or annually

At least once per 7
days
At least once per 31
days
At least once per 92
days
At least once per 184
days
At least once per 276
days
At least once per 366
days

- c. The provisions of Section 16.2.6 are applicable to the above required frequencies for performing inservice inspection and testing activities;
- d. Performance of the above inservice inspection and testing activities shall be in addition to other specified Testing Requirements; and
- e. The ASME Boiler and Pressure Vessel Code supersedes the requirements of any COMMITMENT unless an exception to the Code has been approved.

16.2.10 Testing Requirements shall apply to each unit individually unless otherwise indicated as stated in Section 16.2.4 for individual COMMITMENTS or whenever certain portions of a COMMITMENT contain testing parameters different for each unit, which will be identified in parentheses or footnotes.

MID-LOOP OPERATION WITH IRRADIATED FUEL IN THE CORE16.5-1COMMITMENT

Operations with Reactor Coolant (NC) system level less than or equal to 16% with fuel in the core shall be conducted under the following conditions:

- 1) At least one hot leg will be maintained w/ no S/G nozzle dam installed until the reactor vessel head has been removed.
- 2) If S/G nozzle dams are to be used, one hot leg dam and a hot or cold leg manway on the associated S/C shall remain out anytime the reactor vessel head is in place. If a cold leg manway is being used, then all cold leg nozzle dams must be installed.
- 3) Two independent trains of NC level instruments are required. These instruments shall have independent transmitters and shall not include the NC System sightglass (NCLG-6450) or tygon tubing.
- 4) Two core exit thermocouples shall be maintained operating with temporary high alarms set at 140° F and monitored except as noted below:
 - * Final disconnection of the last two core exit thermocouples shall occur no sooner than two hours prior to reactor vessel head removal.
 - * Reconnection of at least two thermocouples within two hours after reinstalling the reactor vessel head.
 - * The total time without thermocouple indication shall not exceed 12 hours.
- 5) Three power sources shall be available as follows:
 - * Two off-site power sources and one D/G, or
 - * One off-site power source and two D/Gs.
- 6) Two independent makeup paths of borated water shall be available, during each of the following conditions:
 - a) Reactor Coolant System intact:
 - * One Centrifugal Charging Pump (NV) as required per Technical Specifications 3.1.2.1 and 3.1.2.3.

One Safety Injection Pump (NI) having its breaker installed in its associated cubicle and a flow path available from the FWST to the NC System.

b) Reactor Coolant System open to Containment atmosphere via a hot leg vent path:

- * One Centrifugal Charging Pump (NV) as required per Technical Specifications 3.1.2.1 and 3.1.2.3.
- * One of the following gravity flowpaths:
 - * FWST through ND-33 to the cold legs via NI-173A and/or NI-178B.
 - * FWST through the ND suction lines to the hotlegs.
 - * FWST through ND-33 to the hotlegs via NI-183B.

NOTE: The number of open containment penetrations is limited such that the penetrations can be closed within two hours of losing ND.

- 7) Containment Closure must be established. Containment Closure is verified by the performance of PT/1/(2)/A/4200/02C-I, Containment Closure Verification, with penetrations not verified acceptable administratively controlled per OP/0 0/A/6100/14, Penetration Control During Modes 5 and 6.
- 8) The reactor has been subcritical for at least 7 days; or Design Engineering has provided a required subcritical time based on plant operating history and actual reduced NCS level.

APPLICABILITY:

Whenever irradiated fuel is in the reactor vessel and NC System wide range level is less than or equal to 16%.

REMEDIAL ACTION:

If any of the above commitments cannot be met during the time that the reactor vessel is in a reduced inventory condition, take immediate corrective actions to bring the plant into compliance with the COMMITMENT and contact the Station Manager and/or responsible Group Superintendent for additional guidance.

TESTING REQUIREMENTS:

None

REFERENCES:

- 1) Generic Letter 88-17 (Loss of Decay Heat Removal)
- 2) NUREG 1410 (Loss of Vital AC Power and Residual Heat Removal)

during Mid-Loop Operation at Vogtle)

- 3) Catawba Nuclear Station Directive 3.1.30 (Mid-Loop Operation
- 4) OP/1(2)/A/6150/06 (Draining the Reactor Coolant System)
- 5) Catawba Nuclear Station Technical Specifications
- 6) Catawba Nuclear Station Technical Specification Interpretations
- 7) Oconee Nuclear Station Selected Licensee Commitment 16.5.3
- 8) Integrated Scheduling Management Procedure 3.1 (Outage Planning and Execution Responsibilities)
- 9) Catawba Nuclear Station responses to Generic Letter 88-17 dated January 3, 1989

BASES:

Generic Letter 88-17 and NUREG 1410 involve concerns associated with a loss of Residual Heat Removal during NC System reduced inventory. Numerous events have occurred in the industry that resulted in a loss of residual heat removal during reduced inventory operation. This is of great concern due to the potential for substantial core damage occurring in a relatively short time period. This Selected Licensee Commitment depicts those commitments which are extremely important to nuclear safety, however, are not presently covered by Technical Specifications.