

DUKE POWER COMPANY

P.O. BOX 33189
CHARLOTTE, N.C. 28242

HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

TELEPHONE
(704) 373-4531

March 15, 1984

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
Proof and Review Technical Specifications

Dear Mr. Denton:

Following the meeting between Mr. Fred Anderson, Mr. Horace Shaw (of your staff) and representatives of Duke Power on February 28, 1984 concerning the NRC proposed snubber Technical Specification for Catawba Unit 1, we reviewed the March 1, 1974 letter from Joseph Sapir to Dennis L. Ziemann on the subject of "Technical Specifications for Snubber Operability and Surveillance." The purpose of the review was to attempt to determine whether Mr. Sapir intended for the inspection schedule to be used on a system basis or on a unit basis. Application on a system basis requires much less inspection than on a unit basis.

Our conclusion is that Mr. Sapir meant the inspection to be done on an electric generating unit basis. Therefore, it is requested that the Catawba snubber Technical Specification be written to reflect inspection on a "unit" basis instead of the current "system" basis. Conclusions of our review are:

- Although there are places where Mr. Sapir mentions "pipe" or "piping system," we find those references to be consistent with inspection on a unit basis. To a lesser degree, the converse is true.

In four locations, indicated by numbered arrows, we find references to plant (unit) which are not consistent with inspection on a system basis. We find the last two such references (3 and 4) to be consistent only with a unit basis.

- Our understanding of the original intent of the snubber inspection is consistent only with inspection on a unit basis. We believe the intent was to survey all snubbers to locate those which suffered from any of a number of problems which are not system specific.
- Mr. Sapir's analysis provides a .65 probability that all snubbers are operable at the time of a dynamic event. When applied on a unit basis, that sounds reasonable.

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Mr. Harold R. Denton, Director
March 15, 1984
Page 2

If applied on a system basis, we believe the probability of unit protection would be:

$$\text{Punit} = \text{Psystem } 1 \times \text{Psystem } 2 \times \text{Psystem } 3 \dots \times \text{Psystem } n$$

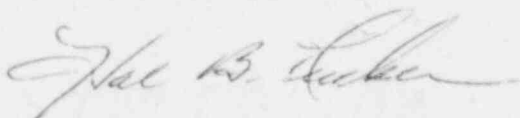
$= (\text{Psystem})^n$ where n = number of systems

Assuming 30 safety related systems (McGuire 1 has at least 31), the probability of unit protection is very small.

- We believe that all utilities and inspectors have interpreted the Technical Specifications to require inspection on a unit basis. We know that this is true at our Oconee and McGuire Nuclear Stations. Inspections required by O & M-4 (latest Revision 1, Draft 4, dated January 1984) are on a unit basis. We know of no contrary interpretation.

Based on the above, we believe that it should be recognized that snubber inspection on a system basis is a new concept and is completely different from present industry direction.

Very truly yours,



Hal B. Tucker

RWO/php

cc: Mr. James P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30303

Palmetto Alliance
2135 1/2 Devine Street
Columbia, South Carolina 29205

Mr. Robert Guild, Esq.
Attorney-at-Law
P. O. Box 12097
Charleston, South Carolina 29412

Mr. Jesse L. Riley
Carolina Environmental Study Group
854 Henley Place
Charlotte, North Carolina 28207

NRC Resident Inspector
Catawba Nuclear Station