

**DUKE POWER COMPANY**

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HAL B. TUCKER  
VICE PRESIDENT  
NUCLEAR PRODUCTION

April 5, 1984

TELEPHONE  
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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 6.2.6 of the Catawba Safety Evaluation Report discusses Confirmatory Item 17, Justification for Not Testing Certain Isolation Valves. Catawba FSAR Table 6.2.4-1 identifies those penetrations that would be vented and drained during a Type A test. For a certain group of these penetrations, it was determined that venting and draining were not appropriate, and would give excessive Type A test results.

The containment penetrations identified in Attachment 1 are those which have a "reverse" check valve bypassing the inside containment isolation valve (which affords post-accident overpressure protection) and which have both "process" containment isolation valves receiving a sealing fluid from the Containment Valve Injection Water System. The "process" containment isolation valves are not required to be vented to containment atmosphere during the Type A test since they receive a fluid seal. The "reverse" check valves cannot be excluded from the venting and draining requirement on this basis since they are not assured of receiving the fluid seal. In order to properly drain and vent the "reverse" check valves, the "process" containment isolation valves must also be drained and vented. In addition, the fluid seal system to the "process" containment isolation valves must be isolated to assure that the "reverse" check valves remain exposed to containment atmosphere. As a result there is an unacceptable amount of air leakage through the "process" containment isolation valves. This gives false indication that leakage through components which could be exposed to post-accident containment atmosphere is excessive and that Type A test results are unsatisfactory.

In order to exclude leakage through "process" containment isolation valves which receive a sealing fluid, Duke Power Company proposes to not drain or vent the penetrations listed in Attachment 1 during Type A testing. Recognizing that the "reverse" check valves are a potential leak path we propose to add the leakage rate for the "reverse" check valves as determined by their Type C test results to the leakage determined by the Type A test. Since Type C testing is performed with air at virtually the same pressure as a full pressure Type A test, this method will include the leakage which would be expected if it were possible to vent and drain the "reverse" check valves while maintaining the fluid seal on the process containment isolation valves.

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Therefore, Duke Power hereby requests an exemption to 10 CFR 50, Appendix J, III.A.(d), Type A test requirement that certain piping be drained and vented for those penetrations listed in Attachment 1. As discussed above, the proposed test method presents an acceptable alternative to the Appendix J requirement.

Very truly yours,

*Hal B. Tucker*

Hal B. Tucker

ROS/php

Attachment

cc: Mr. James P. O'Reilly, Regional Administrator  
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NRC Resident Inspector  
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# Attachment 1

<u>Item # (Note 1)</u>	<u>Press. Valves</u>	<u>Penetration Function</u>	<u>"Reverse Check Valve"</u>
07	NV89A, 91B	RCP Seal Water Return	NV90
45	WL805A, 807B	NCDT Pump Disch.	WL806
46	WL867A, 869B	VUCDT	WL868
47	WL825A, 827B	Con't Floor Sump Pumps	WL321
48	WLA24, WLA21	S/G Drain Pump	WLA22
68	RN484A, 487B	Lower Con't Return Hdr.	RN485
70	RN429A, 432B	Upper Con't Return Hdr.	RN430

1. Item number provides cross-reference with Catawba FSAR Table 6.2.4-1