

DUKE POWER COMPANY

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

HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

TELEPHONE
(704) 373-4531

August 24, 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, Unit 1
Docket No. 50-413

Dear Mr. Denton:

My letters of July 31, 1984 and August 17, 1984 submitted a proposed amendment to the Technical Specifications for Facility Operating License No. NPF-24 for Catawba Unit 1. The purpose of this letter is to supplement the previous discussions of the exigent circumstances involved in the requested amendment.

During the development of the Catawba Technical Specifications, Duke personnel were cognizant of the need to ensure that parameters called out in the Technical Specifications were supported by the Final Safety Analysis Report (FSAR). As such, the parameters for testing the auxiliary feedwater pumps were taken directly from Table 10.4.9-1 and -2 of the FSAR, that represent the nominal design parameters for the Auxiliary Feedwater System. These flow parameters are more conservative than the minimum flow requirements that could have been supported based on the safety analysis outlined in Section 10.4.9.1 of the FSAR. At the time, however, it was considered that the auxiliary feedwater pumps could comply with the flow parameters outlined in the FSAR. During this time period the preoperational functional tests were being conducted on the Auxiliary Feedwater System. While evaluating the test results, Station personnel determined that the acceptance criteria contained in Chapter 14 of the FSAR could not be met. These acceptance criteria were also based on nominal flow parameters, although they were not directly comparable to the numbers in Table 10.4.9.-1 and 10.4.9-2, since they were not at the same point on the pump head curve. For this reason Station personnel did not immediately recognize that the functional test results would also not meet the acceptance criteria in the proposed Technical Specifications.

On or about July 16, 1984, Catawba station personnel concluded that auxiliary feedwater pump test criteria in Technical Specification 4.7.1.2.1.a could not be met. This information did not reach the Duke Corporate offices in time to be included in the Catawba Operating License issued July 18, 1984. Duke's Design Engineering Department then reviewed the Auxiliary Feedwater System minimum flow requirements and determined corresponding flow parameters to be demonstrated during testing through the test loop to the upper surge tank

8409040067 840824
PDR ADOCK 05000413
P PDR

Acc 10

(FSAR Figure 10.4.9-1). The proposed minimum flow requirements envelop the Generic limiting flow requirement for a Westinghouse four-loop plant i.e., 480 GPM as outlined in Section 10.4.9.1 of the FSAR. These proposed parameters also ensure that the minimum flow rate of 492 GPM assumed in the Catawba specific analysis contained in Section 15.2.8 is also met. After the required station and Nuclear Safety Review Board reviews, the amendment was filed on July 31, 1984. Thus in the Licensees' view, the amendment request was developed, reviewed and filed in a timely manner.

As previously discussed, Catawba Unit 1 is currently in Mode 5 and is scheduled to enter Mode 3 on or about September 5, 1984, at which time the Auxiliary Feedwater System would have to be operable. Since the Catawba Unit 1 license was issued on July 18, 1984, the unit has begun startup testing activities. Plant heatup and concurrent testing activities represent the critical path for entering the low power and power operation phase, given the timely issuance of the required operating license. Thus there is a substantial probability that any delay in entering Mode 3 will result in a day-for-day delay in achieving the startup schedule for Catawba. This would result in a substantial financial impact on Duke and its customers and the small cooperatives and municipal electric systems that own the majority of the plant.

It is possible that the motor-driven auxiliary feedwater pumps may be able to meet the present Technical Specification requirements. This would allow the unit to enter Mode 3 with the turbine-driven pump inoperable for the time period allowed by the action statement. The unit then would be forced to cool back down below Mode 3, which would unnecessarily cycle the unit. This process could be repeated if it were determined that additional testing could be accomplished within the time limits imposed by the action statement.

Notwithstanding these considerations, Duke also considers that any significant delays in the startup schedule attributable to this situation would have a demoralizing effect on the plant staff and could potentially disrupt the orderly startup of Catawba. The Catawba Staff has worked long and hard to meet the milestone schedule dates established for the Catawba Unit, and they have been successful in bettering the schedule previously established for loading fuel at Catawba. Given this dedication, the Catawba Staff personnel could not help but be negatively affected by this type of delay, in which case the plant would essentially be sitting idle. When the proposed amendment would be finally issued, every effort would be made to make up for lost time, but because of the nature of the activities involved, it would be virtually impossible to recover more than a small fraction of this lost time. This would place undue pressure on the plant staff and disrupt an orderly startup schedule that has been outlined for the Unit. Therefore Duke contends that the timely issuance of this amendment is both in Duke's and the public's interest as far as contributing to the orderly startup of Catawba.

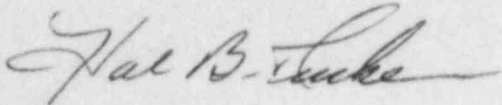
Mr. Harold R. Denton, Director

August 24, 1984

Page 3

As provided in the foregoing discussion, Licensees have demonstrated, in accordance with 10 CFR 50.91, that a timely application was filed and that exigent circumstances exist. It is therefore requested that the previously requested amendment to Catawba Unit 1 Technical Specification 4.7.1.2.1 and the Bases for this specification be granted on or before September 5, 1984.

Very truly yours,



Hal B. Tucker

NAR:slb

Attachment

cc: Mr. James P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

NRC Resident Inspector
Catawba Nuclear Station

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

Palmetto Alliance
2135½ Devine Street
Columbia, South Carolina 29205

Heyward G. Shealy, Chief
Bureau of Radiological Health & Environmental Control
2600 Bull Street
Columbus, South Carolina 29201

Mr. Harold R. Denton, Director

August 24, 1984

Page 4

bcc: K. S. Canady
N. A. Rutherford
R. O. Sharpe
R. C. Futrell
C. L. Hartzell
M. S. Tully
A. V. Carr
J. M. McGarry
J. W. Hampton
A. L. Snow
P. M. White
B. M. Rice
SREC
NC MPA-1
NCEMC
Group File: CN-801.01