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December 3, 1985

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

Attention: Mr. B. J. Youngblood, Project Director
PWR Project Directorate No. 4

Subject: Catawba Nuclear Station
Docket Nos. 50-413 and 50-414
Generic Letter 83-28

Dear Mr. Denton:

The purpose of this letter is to address the status of outstanding commitments made with regard to Generic Letter 83-28 which were included in License Condition 21 for Unit 1 (NPF-35). This license condition references our letters of November 2, and December 31, 1984, in which we provided the status and schedules for implementation of certain outstanding items from Generic Letter 83-28.

Items 1.1 and 1.2 concerned the Post Trip Review Program and capabilities. This program was implemented upon initial criticality of Unit 1.

Item 2.2.2 concerned the Vendor Interface Program. This program as described in our submittal of May 7, 1984, has been fully implemented.

Item 3.1.2 concerned post-maintenance testing for Reactor Trip System components. We submitted the results of our review of Westinghouse technical data letters and bulletins in our December 31, 1984 letter. No Technical Specification changes were found to be needed.

Item 3.2.2 concerns post-maintenance testing of all other safety-related components. We have reviewed Westinghouse technical data letters and bulletins to ensure that any test guidance is appropriately incorporated into test and maintenance procedures for other safety-related components. The results of this review were forwarded along with those specifically concerning the Reactor Trip System components (Item 3.1.2) by our letter of December 31, 1984.

As stated in our original response of November 4, 1983, we have administrative controls in place which ensure that any vendor recommendations received are incorporated into the affected manuals and procedures as necessary. One example of this is the VIL (Vendor Information Letter) Program which was implemented in 1983. One requirement of this program is an annual review in which all Duke Power NSSS vendors are contacted to assure that all formal vendor recommendations have been received and accounted for.

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Mr. Harold R. Denton, Director

December 3, 1985

Page Two

Our original response described a comprehensive program initiated prior to the issuance of Generic Letter 83-28. This program is an ongoing program to verify that all vendor manuals are complete and consistent. Revisions to vendor manuals are also appropriately incorporated into plant procedures. The review of vendor manuals is a systematic plant by plant effort with the following schedule:

McGuire: Began January, 1984 - Complete.

Oconee: Began September, 1984 - Scheduled completion: December, 1986.

Catawba: Begin January, 1987 - Scheduled completion: December, 1987.

In addition to this effort, we have developed a data base for all three stations titled: "Procedure Reference Document Data Base". This data base contains all station procedures, their titles, number and general information. As vendor documents referenced in procedures are received, the appropriate persons are notified of procedures that may require review for possible revision.

We feel that the results of these programs in conjunction with the NPRDS and SEE-IN reporting system adequately address the requirement stated in the NRC position for item 3.2.2.

Items 4.2.1 and 4.2.2 concerned preventative maintenance and parameter trending. Our submittal of December 31, 1984 provided a description of the preventative maintenance program currently in use at Catawba. On June 4, 1985 we received a request for additional information on these two items and responded by letter dated June 24, 1985.

Items 4.2.3 and 4.2.4 concern life cycle testing and replacement programs. The results of the Westinghouse Reactor Trip Breaker Undervoltage and Shunt Trip Attachment Life Cycle Testing were released to the Westinghouse Owners Group on July, 1985 as WCAP 10835 (proprietary).

Information gathered in this testing verifies that there is no breaker maintenance necessary in addition to the existing maintenance procedures and Technical Specification requirements governing the nuclear safety-related use of these breakers. Further, the test results indicate that there is no short term component replacement concern in that the number of trip cycles to which these breakers were subjected in testing translates into a number of years of plant operation.

In our December 31, 1984 letter, we committed to have a maintenance/replacement program for these breakers in effect by the end of the first refueling outage. Based on the results of these tests, we feel that current Duke maintenance/replacement procedures fulfill this commitment. However, the Westinghouse Owners Group has elected to conduct further analyses to acquire complete life-cycle information on the breakers to determine whether or not a long-term maintenance/replacement program is required. The scheduled completion date of this analysis/documentation effort is now June, 1986. Upon completion of our review of these additional analyses, any long-term maintenance/replacement issues will be addressed.

Mr. Harold R. Denton, Director

December 3, 1985

Page Three

Item 4.5.3 concerned the on-line functional testing of the Reactor Trip System. WCAP-10271-A and Supplement 1 were approved by letter from NRC to the Westinghouse Owners Group on February 21, 1985. By letters dated July 22, 1985 and September 11, 1985, we submitted requests for Technical Specification changes for Catawba Unit 1, based on the SER for WCAP-10271 and Supplement 1.

Based on the actions discussed above, it is requested that a license condition similar to LC-21 in NPF-35 be included in the Catawba Unit 2 license, when issued.

Very truly yours,

H.B. Tucker

Hal B. Tucker

LTP:slb

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