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NUCLEAR REGULATORY COMMISSION

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MEMORANDUM FOR: Docket File

FROM: Peter S. Tam, Senior Project Manager
Project Directorate II-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

SUBJECT: CATAWBA UNITS 1 AND 2 - UPCOMING SITE REVIEW OF DOCUMENTS
RELATED TO 10 CFR 50.59 CHANGES (TAC M98326 AND M98327)

REFERENCE: Letter, W. R. McCollum to NRC, March 31, 1997

The attached document, listing certain 10 CFR 50.59 evaluations that Duke Power Company performed for Catawba during 1996, and the staff's preliminary comments on the subject submittal, was sent to Duke Power company today by fax. The sole purpose of the document is to prepare Catawba personnel for a site review on June 23 and 24, 1997, of the 10 CFR 50.59 evaluations performed in 1996. The document does not constitute a formal request for information or represent a formal NRC staff position.

Docket Nos. 50-413 and 50-414

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Site Review of 1996 10 CFR 50.59 Changes at Catawba

(Reference: Letter, W. R. McCollum to NRC, March 31, 1997)

Please have the 10 CFR 50.59 procedure for Catawba available.

Please have the following 10 CFR 50.59 evaluations available:

1. Exempt Change CE-3176
2. Exempt Change CE-3705
3. Exempt Change CE-3759
4. Exempt Change CE-4745 (or 4746)
5. Exempt Change CE-4721 (or 4722)
6. Exempt Change CE-7416
7. Exempt Change CE-7977
8. Exempt Change CE-8126
9. Exempt Change CE-8182
10. Exempt Change CE-8245
11. Exempt Change CE-8410
12. Exempt Change CE-61008
13. Exempt Change CE-61162
14. Miscellaneous Changes Simulate Version 4
15. NSM CN-11371
16. NSM CN-20396
17. PIP 2-C97-0157 (or PIP 2-096-3250)
18. Operability Evaluation 2/15/94 (or 2/18/94)
19. Operability Evaluation 6/28/94
20. OP/1/A/6200/11 [summary provided almost no information]
21. AM/2/A/5100/07 [summary too scanty]
22. OP/2/B/6200/33, Change 4 Rev. 4
23. OP/1/A/6550/14
24. PT/1/B/4700/82

Please be prepared to discuss the following issues/observations. Do not provide any document. Many comments can be verbally answered by only a word or a phrase. However, the licensee may consider providing some of the answers in writing.

1. The use of Duke-specific acronyms such as NC, ND, RN - The referenced report, which was submitted to the NRC and is thus publicly available, very often provides no clues what these acronym are. This problem is most prominent in the "Exempt Changes" section. The staff has made a similar comment in Inspection Report 96-10 (August 23, 1996) regarding the report submitted for 10 CFR 50.59 changes made in 1995.
2. Exempt Change: CE-1593. What system does this pertain to?
3. Exempt Change CE-3316. This is an example of an evaluation that provides the essential information on scope, depth, and details. Note also the absence of Duke-specific acronyms.
4. Exempt Change CE-3759. What is the "Nuclear 06 Program"? The evaluation is too scanty in details. 10 CFR 50.59(b)(2) specifically

requires "a summary of the safety evaluation of each."

5. Exempt Change CE-4203. What system/structure does this refer to?
6. Exempt Change CE-4373. When did "LEOC7" take place? It appears the changes were made before the current reporting period. Explain.
7. Exempt Change CE-4435. What system does this refer to?
8. Exempt Change CE-4686 and 4687. Consider different ways to say "does not appear significant enough to be included in the FSAR."
9. Exempt Change CE-4706. What system does this refer to?
10. Exempt Change CE-4899. Does "1CAPG4030" refer to the auxiliary feedwater system?
11. Exempt Change CE-5017. The evaluation says that no Technical Specification (TS) changes are required. The staff notes that a TS change was effected via Amendments 152 (Unit 1) and 144 (Unit 2). The evaluation also says that FSAR changes are "attached"; this phrase probably does not belong in this report.
12. Exempt Change CE-7040. "The new regulator will not provide a reliable output pressure...." Do you mean the opposite?
13. Exempt Change CE-7218. Which amendment (cite number) effected the change?
14. Exempt Change CE-7930. "Over the years, this calculation has been revised several times....FSAR were not updated in conjunction with this new information." What are the reasons for the FSAR not being updated?
15. Exempt Change CE-7998. What is the Red Book?
16. Exempt Change CE-8245. When would you request to amend TS 4.7.13.3(a)(2)?
17. Exempt Change CE-61162. Evaluation is missing. 10 CFR 50.59(b)(2) specifically requires "a summary of the safety evaluation of each."
18. Exempt Change CE-61214. What are these: DFCS CFPT?
19. Exempt Change CE-61234. What is CLA?
20. FSAR 6.4.4.2. What is the "NRC questionnaire"?
21. FSAR Table 6-74. The recently completed self-assessment Containment Integrity Review shows that a change to TS Table 3.6.1 should have been processed. Is Catawba currently in non-compliance?
22. NSM CE-4382. What system does this refer to? What is ETSV?
23. NSM CN-11347, CN-11352, CN-11354, CN-11355, CN-11360.... These are a

few examples of evaluations that provide the essential information on scope, depth, and details. The clarity of these are in contrast to some in the "Exempt Changes" section.

24. NSM CN-11375. Note that under "Description", the document stated that ".....design temperature will increase from 160°F to 2500°F....". Presumably, it should be ".....160°F to 250°F....". Also, the subject of this NSM was involved in a violation in Inspection Report 96-05 (5/31/96). What is the status of that violation?
25. NSM CN-21367. Please provide the number of the amendment that resulted from the 9/13/95 request.
26. NSM CN-50441. What system is involved? What do hydromotors do in this system?
27. NSM CN-50443. "This modification does involve a Structure,...." Do you really mean "does not involve"?
28. PIP 2-C97-0157. Please cite the NRC inspection report, if any, which addressed this event.
29. PIP 2-C96-3250. Please cite the NRC inspection report, if any, which addressed this event.
30. PIP 0-C96-1824. "A Tech Spec change to correct this non-conservative value is needed." When would this change request be submitted? What measures have been instituted to temporarily overcome the TS non-conservatism?
31. PIP 0-C96-3241 and 0-C96-3266. These events were addressed in NRC IR 97-04 (February 18, 1997). Are they now fully resolved?
32. Section 6.0, Operability Evaluations. Explain why all the entries are dated before 1996.
33. Section 6.0, 7/1/94. "....it is considered that the Unit 1.....compensatory actions used during maintenance on IRF 859 will adversely...." Do you mean "....will not adversely...."?
34. PT/2/A/4200/12 and PT/2/A/4200/01N. What were the changes to these procedures? Also, the evaluations seem skimpy. 10 CFR 50.59(b)(2) specifically requires "a summary of the safety evaluation of each."
35. PT/2/A/4400/01. "...therefore, this activity does involve an Unreviewed safety question." Do you mean "....does not involve...."? Also, the next sentence apparently makes no sense.
36. AM/1/A/5100/07. The evaluation just asserted that no USQ exists without a brief evaluation. 10 CFR 50.59(b)(2) specifically requires "a summary of the safety evaluation of each."
37. AP/0/5500/39. Does the procedure address security provisions with the control room doors kept opened? This was probably reviewed by the staff

(IR 97-07, page 4); please verify.

38. CP/O/B/8500/30. Does Clam-Trol control clam growth? If so, is there another procedure in place of this one?
39. IP/O/A/3200/12. What is SSPS?
40. OP/1/B/6200/22, OP/1/A/6200/28, and a few others. "This change in no way make the procedure less conservative and has no impact on plant safety." Note that this statement does not seem to be a summary of a 10 CFR 50.59 evaluation.
41. OP/O/A/6200/26. What is "EMF"?
42. OP/O/B/6500/34. "This change does not warrant further review of the FSAR for an unreviewed safety question." This statement does not seem to be responsive to any provision of 10 CFR 50.59. Suggest avoiding similar statements in future reports.
43. PT/1/A/4250/02B. "The probabilities have gone up slightly..... but are still within the NRC limits established for rotor missile probabilities." Were these probabilities originally documented in the FSAR or UFSAR? Note that if they were so documented, 10 CFR 50.59 is only concerned if they are increased or not, and not the magnitude of the increase ("slightly").
44. PT/2/A/4400/09. "There are changes to any design limit or setpoint.... This modification will change the flow, temperature," You seem to have said the exact opposite to what you intended to say in these sentences.
45. PT/1/A/4600/02A. "Also, there are changes to the FSAR or Technical Specifications." You seem to have said the exact opposite to what you intended to say.
46. TT/1/A/9200/88. "There are Unreviewed Safety Questions associated with this test procedure." If this statement is true, then this test cannot be performed under 10 CFR 50.59.
47. TSM/96023671. Which amendment revised the Tech. Spec. regarding the humidistats?
48. Many changes in this report involve (future) UFSAR changes. When you submit the next UFSAR revision, please consider providing a brief reference to the associated 10 CFR 50.59 evaluations. For example, "Figure 9-89 modified as a result of CN-21343", "Table 3-106 revised as a result of CN-21339", etc.