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RA-21-0283

October 28, 2021

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555-0001

Subject: Duke Energy Carolinas, LLC (Duke)  
Catawba Nuclear Station, Units 1 and 2  
Docket Nos.: 50-413 and 50-414  
Commitment Change Evaluation Report for 2020 to October 28, 2021

Regarding the subject report requirement, notification of regulatory commitment changes are provided in Enclosure 1 for Catawba Nuclear Station. This letter is being submitted in accordance with NEI 99-04, *Guidelines for Managing NRC Commitments*. This letter informs the NRC of changes in commitments made during the time period from January 1, 2020, through October 28, 2021.

Questions should be directed to Sherry Andrews, Catawba Regulatory Affairs, at 803-701-3424.

Sincerely,

A handwritten signature in black ink that reads "Tom Simril". The signature is fluid and cursive, with a large loop at the end of the last name.

Tom Simril  
Vice President, Catawba Nuclear Station

Enclosure 1: Catawba Nuclear Station, Notification of Regulatory Commitment Changes

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xc:

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U. S. Nuclear Regulatory Commission

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Enclosure 1

Catawba Nuclear Station  
Notification of Regulatory Commitment Changes

**Commitment Tracking Number:** 02269653-18

**Existing Commitment:**

In response to NAC Bulletin 2003-01 and to NRC Generic Letter 2004-02, Duke Energy stated that current cleaning practices at Catawba Nuclear Station were as follows from correspondence dated August 7, 2003, found in ADAMS accession number ML032260651, Enclosure II for Catawba Nuclear Station, Item 4:

"Current practice at CNS Includes aggressive containment cleaning and cleanliness walkdowns. CNS outage practices assuring containment cleanliness are described as follows:

- Containment cleaning is conducted prior to Mode 4.
- Extensive containment cleaning is conducted using water spray. In general, wash downs are limited to the space in lower containment that would be submerged under large break LOCA conditions. Accessible floor and wall surfaces and mechanical equipment are washed down.
- Localized washdowns are performed as directed by Radiation Protection.
- Visual inspections are performed on remaining areas of containment. Identified potential debris is cleaned or removed as necessary.
- Containment cleanliness is verified prior to entry into Mode 4 by an Inspection controlled by procedure. This cleanliness inspection ensures that the ECCS sump area is free of debris.

Containment FME controls and inspection activities are implemented during Modes 1 through 4. CNS FME control practices and Inspection activities assuring containment cleanliness during Modes 1 through 4 are described as follows:

- Containment entries during normal power operations are controlled by an administrative procedure. Current process relies on FME and containment cleanliness training, pre-job briefs, and completion of containment access closeout logs.

Increased material accountability control at CNS is planned by requiring material accountability logs be kept for items carried into and out of containment during normal power operations (Modes 1 through 4). These procedural changes will be in place prior to end of the next refueling outage (1 EOC14, Fall 2003)."

**Revised Commitment:**

Procedural controls governing containment cleanliness and material accountability control to remain the same. Containment will be sprayed down as necessary at the discretion of an SRO with input from Radiation Protection.

**Basis for Revision:**

Given the current operating practices and procedural controls in place, lower containment spray down does not provide any additional benefit to containment cleanliness. However, procedures will be modified so that spray down can still be performed when deemed necessary by an SRO or as directed by Radiation Protection prior to Mode 4 entry.

**Commitment Tracking Number:** 02251444-05

**Existing Commitment:**

Perform the quarterly flush of the RN to CA piping immediately upstream of the RN/CA isolation valves and perform the RN to CA flow measurement test every 18 months on the affected unit.

**Revised Commitment:**

Perform the quarterly flush of the RN to CA piping immediately upstream of the RN/CA isolation valves.

**Basis for Revision:**

Commitment Change 2008-C-03 was created to eliminate the original Generic letter 89-13 commitment for the verification of no debris in the Nuclear Service Water System (RN) to the Auxiliary Feedwater System (CA) piping between the RN header and the RN/CA Isolation valve via radiography. The revised commitment included reliance upon the quarterly flush of this short section of piping (PT/1(2)/A/4200/059) and the performance of the RN to CA flow verification test (PT/1 (2)A/4400/014) on an 18-month frequency.

The performance of the dead leg piping flush upstream of the RN/CA isolation valve is performed Immediately prior to the flow verification test to prevent any settled debris from being transported to the CA system. This flush and the quarterly flushes result in the flow verification test providing no benefit in the elimination of debris transport from RN to CA in support of the 2008 commitment change, as the quarterly flush has been proven to be an equally effective and acceptable alternative means to comply with the pipe cleanliness specified by Generic Letter 89-13. The performance of the quarterly flushes on both units performed via PT/1(2)/A/4200/059 has shown no debris in the strainer used In the flush piping.

PT/1(2)A/4400/014 validates the piping roughness parameters assumed in calculation CNC-1223.42-00-0001 (Confirmation of CA System RN Transfer Scheme Adequacy). Previous test results for the previous 4 years show that the system piping between the RN Isolation valve and the CA pump suction has not indicated any fouling. The test results for all four trains of CA are well below the test acceptance line. This test was originally performed when the RN to CA isolation valve was located in the CA pump room which resulted In the piping between the RN valves and CA being filled with raw service water. Station modifications relocated these valves on the same elevation as the main RN supply header. This has allowed the piping downstream of the RN Isolation valves to be filled with condensate grade water which minimizes any potential for fouling that would challenge the assumed piping roughness In the transfer scheme adequacy calculation.

Therefore, the commitment to perform the RN to CA flow verification test as described In the 2008 commitment change can be deleted with the reliance on the RN/CA dead leg flushes which are performed quarterly. In addition, the elimination of the flow verification test from the previous Generic Letter 89-13 does not impact the ability of the RN system to provide emergency cooling water to the CA system.

**Commitment Tracking Number:** 02092075-07

**Existing Commitment:**

In response to GL 90-03, Item (b), CP&L and Duke Power described how an adequate vendor interface program for BNP, HNP, RNP, CNS, MNS, and ONS would be maintained which include periodic contact with vendors of key safety-related components (beyond those provided by the NSSS supplier).

**Revised Commitment:**

The requirement in AD-EG-ALL-1670, Section 5.6 Vendor Re-Contact Program (Revision 0) to periodically contact vendors of critical equipment installed at Duke Energy Nuclear Sites at least every three years to obtain new product information relevant to installed plant equipment will be eliminated.

**Basis for Revision:**

Based on the continued improvement and maturity of the Operating Experience, Equipment Reliability and Predictive and Preventative Maintenance Programs being implemented across the Duke Fleet, the requirement to periodically re-contact OEM vendors has no significant benefit to nuclear safety. The current Fleet level Programs and Procedures described previously, and other methods of communication with vendors, ensure the reliability of critical SSCs important to nuclear safety.