



Gary R. Peterson
Vice President

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August 17, 2000

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Subject: Duke Energy Corporation
Catawba Nuclear Station, Units 1 and 2
Docket Numbers 50-413 and 50-414

Supplement to Proposed Technical Specification
Amendment for Technical Specification 3.5.2,
Emergency Core Cooling System, 3.6.6, Containment
Spray System, 3.6.17, Containment Valve Injection
Water System, 3.7.5, Auxiliary Feedwater System,
3.7.7, Component Cooling Water System, 3.7.8,
Nuclear Service Water System, 3.7.10, Control Room
Area Ventilation System, 3.7.12, Auxiliary
Building Filtered Ventilation Exhaust System, &
3.8.1, AC Sources - Operating

Pursuant to 10CFR50.90 and by means of letters submitted on
May 25, 2000 and August 8, 2000, Duke Energy Corporation
submitted to the NRC a proposed Technical Specification (TS)
Amendment for the Catawba Nuclear Station. This proposed TS
amendment addressed temporary TS changes for Nuclear Service
Water Cleaning and modifications to be completed in an
upcoming refueling outage.

This proposed TS amendment was discussed on August 14, 2000
during a telephone conference call between NRC officials and
Duke representatives. Based on the discussions that took
place during this conference call, Duke is hereby submitting
a supplement to this proposed TS amendment. The changes
proposed in this supplement apply to the No Significant
Hazards Considerations to provide clarification to the
conclusions being made. The revisions in this supplement do
not change the conclusions reached in the original no
significant hazards evaluation. The revised No Significant
Hazards Considerations in Attachment 4 supercedes the
previous Attachment 4 submitted in our August 8, 2000 letter
in its entirety.

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The description of the Proposed Changes and Technical Justification, the basis for the categorical exclusion from performing an Environmental Assessment/Impact Statement, and the other changes as originally contained in the May 25, 2000 and August 8, 2000 submittals are not impacted by this supplement.

Pursuant to 10CFR50.91, a copy of this proposed amendment is being sent to the appropriate State of South Carolina official.

Inquiries on this matter should be directed to R. D. Hart at (803) 831-3622.

Very truly yours,

A handwritten signature in black ink, appearing to read "Gary R. Peterson". The signature is fluid and cursive, with a large loop at the end.

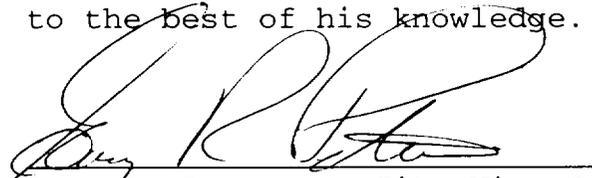
Gary R. Peterson

RDH/s

Attachments

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Gary R. Peterson, being duly sworn, states that he is Site Vice President of Duke Energy Corporation; that he is authorized on the part of said corporation to sign and file with the Nuclear Regulatory Commission this request for additional information for an amendment to the Catawba Nuclear Station Facility Operating License Numbers NPF-35 and NPF-52 and Technical Specifications; and that all statements and matters set forth herein are true and correct to the best of his knowledge.



Gary R. Peterson, Site Vice President

Subscribed and sworn to me: 8-17-2000
Date



Notary Public

My commission expires: 6-26-2002
Date

SEAL

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xc (with attachments):

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bxc (with attachments):

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Document Control File 801.01
RGC File
ELL-EC050

ATTACHMENT 4

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

No Significant Hazards Consideration Determination

Catawba is currently pursuing a project to clean and modify the nuclear service water system (NSWS) piping for both units. This is necessary to maintain the long-term reliability of the NSWS. This project represents a challenge in that it is not possible to isolate, drain, clean, restore and test the NSWS during the current TS action time frame. The purpose of this submittal is to request a temporary change to the existing TS for the systems affected during the project. This will permit an orderly and efficient project implementation during the refueling outage 1EOC12 and during power operation on Unit 2. The specific change is to extend the TS required action time from 72 hours to 288 hours.

The following discussion is a summary of the evaluation of the changes contained in this proposed amendment against the 10 CFR 50.92(c) requirements to demonstrate that all three standards are satisfied. A no significant hazards consideration is indicated if operation of the facility in accordance with the proposed amendment would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated, or
2. Create the possibility of a new or different kind of accident from any accident previously evaluated, or
3. Involve a significant reduction in a margin of safety.

First Standard

The cleaning and modification project for the NSWS and proposed TS changes have been evaluated to assess their impact on normal operation of the systems affected and to ensure that the design basis safety functions are preserved. During the cleaning the other NSWS train will be operable and no major maintenance or testing will be done on the operable train. The operable train will be protected to help ensure it would be available if called upon.

This cleaning and modification project will increase the available flow margin in the NSWS system. This increase in margin will ensure that each NSWS header has an increased flow margin to enhance its ability to comply with design basis requirements. This will allow Catawba to reduce the amount of unavailability for the NSWS system in the future and increase the overall reliability for many years.

Currently, Catawba periodically performs flow tests to ensure that the required design flow is maintained from the NSWS to the AFW system. This has resulted in an increase in the unavailability of the AFW system. By completing this project, Catawba will be able to increase the NSWS flow margin for the AFW system and reduce the amount of flow testing that will be required in the future. This will result in a decrease in the unavailability of the AFW system and improvement in its overall reliability. This will result in an improved safety margin for Catawba.

The increased NSWS train unavailability that results from the implementation of this amendment does involve a one time increase in the probability or consequences of an accident previously evaluated during the time frame the NSWS headers are out of service for cleaning. Considering this small time frame for each NSWS train outage with the increased reliability and the decrease in unavailability of the NSWS and AFW systems in the future because of this project, the overall probability or consequences of an accident previously evaluated will decrease.

Second Standard

Implementation of this amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed temporary TS changes do not affect the basic operation of the ECCS, CSS, CVIWS, NSWS, AFW, CCW, CRAVS, ABFVES, or EDG systems. The only change is increasing the required action time frame from 72 hours to 288 hours (ECCS, CSS, NSWS, AFW, CCW, and EDG) or from 168 hours to 288 hours (CVIWS, CRAVS and ABFVES). During the project, contingency measures will be in place to provide additional assurance that the affected systems will be able to complete their design functions.

No new accident causal mechanisms are created as a result of NRC approval of this amendment request. No changes are being made to the plant, which will introduce any new accident causal mechanisms.

Third Standard

Implementation of this amendment would not involve a significant reduction in a margin of safety. Margin of safety is related to the confidence in the ability of the fission product barriers to perform their design functions during and following an accident situation. These barriers include the fuel cladding, the reactor coolant system, and the containment system. The performance of these fission

product barriers will not be impacted by implementation of this proposed temporary TS amendment. During the outages for each NSWS header, the affected systems will still be capable of performing their required functions and contingency measures will be in place to provide additional assurance that the affected systems will be maintained in a condition to be able to complete their design functions. Therefore, there is not a significant reduction in the margin of safety.

Based upon the preceding discussion, Duke Energy has concluded that the proposed amendment for a temporary one time TS change does not involve a significant hazards consideration.