Duke Power
A Duke Energy Company

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October 4, 2000

RE: Catawba Nuclear Station
Selected Licensee Commitments Manual
Revision Date 09/25/00

Attached are revisions to the Catawba Nuclear Station Selected Licensee Commitments Manual. Please remove and replace the following pages:

REMOVE	INSERT
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Page 2 of 8 dated 07/22/00	Page 2 of 8 dated 09/11/00
Page 5 of 8 dated 03/09/00	Page 5 of 8 dated 09/25/00
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If you have any questions concerning the contents of this package update, contact Toni Pasour at (803) 831-3566.

Gary D. Gilbert
Regulatory Compliance Manager

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CATAWBA NUCLEAR STATION
FINAL SAFETY ANALYSIS REPORT
SELECTED LICENSEE COMMITMENTS

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16.6 ENGINEERED SAFETY FEATURES

16.6-5 RESIDUAL HEAT REMOVAL/CONTAINMENT SPRAY SUMP PUMP INTERLOCK

COMMITMENT:

The residual heat removal/containment spray sump pump interlock shall be OPERABLE.

APPLICABILITY:

MODES 1, 2, 3, and 4.

REMEDIAL ACTION:

With the above COMMITMENT not met, immediately initiate action to implement alternate means of fulfilling the function of the interlock.

TESTING REQUIREMENTS:

At least once per 18 months, verify that the residual heat removal/containment spray sump pump interlock is OPERABLE by performance of a SLAVE RELAY TEST of the interlock slave relay.

REFERENCES:

1. Catawba Updated Final Safety Analysis Report Section 6.3.2.5.

2. Catawba Safety Evaluation Report Section 6.3.2.

3. WCAP-13877, Revision 1-P-A, "Reliability Assessment of Westinghouse Type AR Relays Used as SSPS Slave Relays," December 1999.

BASES:

The basis for the residual heat removal/containment spray sump pump interlock is to alert the operator to potential Emergency Core Cooling System leakage. The interlock will inhibit operation of the sump pumps at the high level setpoint, subsequent to a safety injection signal on either unit. When the sump inventory increases to the high-high level setpoint, an alarm in the control room alerts the operator to the increasing sump level and the sump pumps will start. In the event that the COMMITMENT is not met, the REMEDIAL ACTION ensures that the function of the interlock can be fulfilled using alternate means (e.g., such as a

BASES: **(con't)**

compensatory action). The interlock utilizes a slave relay in the Auxiliary Safeguards Test Cabinet; however, this particular relay does not perform any actual Engineered Safety Features function. The specified testing requirement ensures that the interlock remains capable of performing its intended function. The 18-month frequency is based on the known reliability of relays of this type.

16.9 AUXILIARY SYSTEMS

16.9-13 SNUBBERS

COMMITMENT:

All snubbers shall be OPERABLE. The only snubbers excluded from the requirements are those installed on non safety-related systems and then only if their failure or failure of the system on which they are installed would have no adverse effect on any safety-related system.

APPLICABILITY:

MODES 1, 2, 3, and 4. MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES.

REMEDIAL ACTION:

With one or more snubbers inoperable, immediately enter the applicable ACTIONS for any affected system(s) and component(s) that are determined to be inoperable. If one or more snubbers fail to meet the test acceptance criteria, within 72 hours (or prior to restoring the affected system to operation) perform an engineering evaluation per TESTING REQUIREMENT 16.9-13g.

TESTING REQUIREMENTS:

Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program.

a. Inspection Types

As used in this specification, "type of snubber" shall mean snubbers of the same design and manufacturer, irrespective of capacity.

b. Visual Inspections

Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these categories (inaccessible and accessible) may be inspected independently according to the schedule determined by Table 16.9-13A. The visual inspection interval for each category of snubber shall be determined based upon the criteria provided in Table 16.9-13A and the first inspection interval determined using this criteria shall be based upon the previous inspection interval as established by the requirements in effect before Technical Specification Amendment 88 (Unit 1) and 82 (Unit 2).

TESTING REQUIREMENTS (con't)

which the service life commences, and associated installation and maintenance records shall be retained for the duration of the Unit Operating License.

REFERENCES:

1. Letter from W.R. McCollum, Jr. to NRC, Request for Relief 95-05, Snubber Inspection Interval for Unit 1, August 23, 1995.
2. Letter from W.R. McCollum, Jr. to NRC, Request for Relief 96-01, Snubber Inspection Interval for Unit 2, February 12, 1996.
3. Letter from NRC to W.R. McCollum, Request for Relief 95-05, January 11, 1996.
4. Letter from NRC to W.R. McCollum, Request for Relief 96-01, May 16, 1996.
5. Letter from NRC to Gary R. Peterson, Duke, Issuance of Improved Technical Specifications Amendments for Catawba, September 30, 1998.
6. Letter from M.S. Tuckman to NRC, Licensing Position Regarding Snubbers, May 20, 1999.
7. Letter from NRC to G.R. Peterson, Licensing Position Regarding Snubbers, July 7, 1999.

BASES:

All snubbers are required OPERABLE to ensure that the structural integrity of the Reactor Coolant System and all other safety-related systems is maintained during and following a seismic or other event initiating dynamic loads.

The snubber requirements of SLC 16.9-13 were originally located in the Technical Specifications. The Nuclear Regulatory Commission (NRC) authorized the use of these requirements, while located in Technical Specifications, as an acceptable alternative to the requirements of the ASME Code, 1989 Edition, Section XI, Article IWF-5000 (References 3, 4). Any revision to these snubber visual inspection and functional test requirements shall consider the basis for the granted relief from the ASME Code requirements and any resulting requirement for NRC review and approval.

Remedial Actions

Should one or more snubbers be inoperable, OPERABILITY of the affected system(s) and component(s) must be determined and the applicable ACTIONS entered immediately. If there remains a reasonable assurance of OPERABILITY of the affected system(s) or component(s) with the condition of an inoperable snubber(s), then it is not necessary to enter the respective ACTIONS for inoperable system(s) and component(s). A snubber removed from service for any reason cannot be considered OPERABLE since it is not connected to the supported system or component.

BASES (cont'd)

Should one or more snubbers fail to meet testing acceptance criteria or be discovered in a condition where failure is apparent, an engineering evaluation is to be performed within the prescribed time frame, as described in "Functional Test Failure Analysis."

The snubber testing program may remove snubbers from service and restore OPERABILITY of the snubber application by replacement with another like snubber. In this situation, if the removed snubber later fails to meet test acceptance criteria, the system ACTION is not applicable since the snubber component has no current required function; however, the engineering evaluation per 16.9-13g is still required to determine the failure cause and address transportability issues. During the allowed 72 hours to perform an engineering evaluation or at any other time, when conditions of the affected system(s) and component(s) are determined to no longer support a reasonable assurance of OPERABILITY, applicable ACTIONS are to be entered immediately.

All snubbers that fail to meet the functional test criteria provided in 16.9-13f must be evaluated to determine the cause, and the potential for applicability of the failure mode to other snubbers. Likewise, an evaluation is required to determine if the attached components have been adversely affected by the functional failure of the snubber. It is noted that the evaluation is only required for snubbers that are inoperable due to a failure of the snubber itself to meet the functional requirements. A snubber that is inoperable due solely to being disconnected from the supported component does not necessitate a component or system evaluation, provided that the snubber itself meets the requirements of 16.9-13f. In this case, the only action required is that the snubber be completely restored and the cause of the disconnection determined and evaluated for generic implications.

Snubbers are classified and grouped by design and manufacturer but not by size. For example, mechanical snubbers utilizing the same design features of the 2-kip, 10-kip, and 100-kip capacity manufactured by Company "A" are of the same type. The same design mechanical snubbers manufactured by Company "B" for the purposes of this Commitment would be of a different type, as would hydraulic snubbers from either manufacturer.

A list of individual snubbers with detailed information of snubber location and size and of system affected shall be available at the plant in accordance with Section 50.71(c) of 10 CFR Part 50. The addition or deletions of any hydraulic or mechanical snubber shall be made in accordance with Section 50.59 of 10 CFR Part 50.

The visual inspection frequency is based upon maintaining a constant level of snubber protection during an earthquake or severe transient. Therefore, the required inspection interval varies inversely with the observed snubber failures and

is determined by the number of inoperable snubbers found during an inspection. In order to establish the inspection frequency for each type of snubber, it was assumed that the frequency of snubber failures and initiating events are constant with time and that the failure of any snubber on that system could cause the system to be unprotected and to result in failure during an assumed initiating event. Inspections performed before that interval has elapsed may be used as a new reference point to determine the next inspection. However, the results of such early inspections performed before the original required time interval has elapsed (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results require a shorter inspection interval will override the previous schedule. The acceptance criteria are to be used in the visual inspection to determine OPERABILITY of the snubbers.

To provide assurance of snubber functional reliability, one of three functional testing methods are used with the stated acceptance criteria:

1. Functionally test 10% of a type of snubber with an additional 10% tested for each functional testing failure, or

2. Functionally test a sample size and determine sample acceptance using Figure 16.9-13A, or

3. Functionally test a representative sample size and determine sample acceptance or rejection using the stated equation.

Figure 16.9-13A was developed using "Wald's Sequential Probability Ratio Plan" as described in "Quality Control and Industrial Statistics" by Acheson J. Duncan.

Permanent or other exemptions from the inspection program for individual snubbers may be granted by the Commission if a justifiable basis for exemption is presented and, if applicable, snubber life testing was performed to qualify the snubber for the applicable design conditions. Snubbers so exempted shall be listed in the list of individual snubbers indicating the extent of the exemptions.

The service life of a snubber is established via manufacturer input and information through consideration of the snubber service conditions and associated installation and maintenance records (newly installed snubbers, seal replaced, spring replaced, in high radiation area, in high temperature area, etc.).

The requirement to monitor the snubber service life is included to ensure that the snubbers periodically undergo a performance evaluation in view of their age and operating conditions. These records will provide statistical bases for future consideration of snubber service life.