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SELECTED LICENSEE COMMITMENTS

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VICE PRESIDENT
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August 6, 2001

RE: Catawba Nuclear Station
Selected Licensee Commitments Manual
Revision Dates 07/30/01 & 08/02/01

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

REMOVE

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LIST OF EFFECTIVE PAGES

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dated 04/30/01

Chapter 16.0, page 1 of 4
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dated 01/16/99

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dated 08/02/01

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dated 08/02/01

TAB 16.11

Chapter 16.11-7, page 7 of 10
dated 07/22/00

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dated 07/30/01

If you have any questions concerning the contents of this package update, contact Toni Pasour at (803) 831-3566.


jdg Gary D. Gilbert
Regulatory Compliance Manager

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**CATAWBA NUCLEAR STATION
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16.6 **ENGINEERED SAFETY FEATURES**

16.6-4 **CHLORINE DETECTORS AND ASSOCIATED CIRCUITRY**

COMMITMENT:

Four chlorine detectors and associated circuitry (two per control room intake), with their Alarm Setpoints adjusted to actuate at a chlorine concentration of less than or equal to 5 ppm, shall be OPERABLE.

APPLICABILITY:

All MODES.

REMEDIAL ACTION:

- a. With one chlorine detector and/or associated circuitry inoperable in one or both control room intakes, restore the inoperable equipment to OPERABLE status within 30 days. Otherwise, isolate the affected control room intake(s) within the next hour. (In the event that both control room intakes are isolated, both trains of the Control Room Area Ventilation System (CRAVS) will be rendered inoperable and the applicable Conditions and Required Actions of Technical Specification 3.7.10 shall be entered and followed.)*

- b. With both chlorine detectors and/or associated circuitry inoperable in one or both control room intakes, immediately isolate the affected control room intake(s). (In the event that both control room intakes are isolated, both trains of the Control Room Area Ventilation System (CRAVS) will be rendered inoperable and the applicable Conditions and Required Actions of Technical Specification 3.7.10 shall be entered and followed.)*

NOTE: The provisions of SLC 16.2.3 are not applicable.

TESTING REQUIREMENTS:

Each chlorine detector and associated circuitry shall be demonstrated OPERABLE by performance of a CHANNEL OPERATIONAL TEST at least once per 31 days and a CHANNEL CALIBRATION at least once per 18 months.

* For the purpose of implementing modification work associated with deleting the high chlorine automatic control room intake isolation function and downgrading the chlorine detectors and/or associated circuitry to non-safety related status, entry into this REMEDIAL ACTION is not required for pre-planned activities resulting in one inoperable chlorine detector and/or associated circuitry.

REFERENCES:

1. Letter from NRC to Gary R. Peterson, Duke, Issuance of Improved Technical Specifications Amendments for Catawba, September 30, 1998.
2. Letter from NRC to G.R. Peterson, Duke, Issuance of Amendments 191/183, June 28, 2001.

BASES:

The OPERABILITY of the chlorine detectors and associated circuitry is provided as a defense-in-depth measure to ensure that sufficient capability is available to promptly detect and respond to an accidental chlorine release. The capability for the protection of control room personnel is consistent with the recommendations of Regulatory Guide 1.95, Revision 1, January 1977, "Protection of Nuclear Power Plant Control Room Operators Against an Accidental Chlorine Release."

Regulatory Guide 1.95 states in Section C.2 that the capability to manually isolate the control room should be provided "... if a chlorine container having an inventory of 150 lbs. or less is stored more than 100 meters from the control room or its fresh air intakes..." All chlorine containers at Catawba are stored or used at least 158 meters (520 feet) from the nearest control room outside air intake and the inventory of chlorine in any single "container" is less than or equal to 100 lbs. (Note that Catawba only uses 50-lb. cylinders with a maximum of two cylinders manifolded together.) Thus, automatic isolation/closure of an intake is not required and it is acceptable to leave an intake open for a limited time period even if a single detector on an intake were to alarm. This follows the implied logic of the Regulatory Guide that if the quantity of gaseous chlorine onsite is small enough, it is not credible to assume a chlorine container failure results in a significant impact to the control room. This position is documented in calculation CNC-1211.00-00-0124.

The REMEDIAL ACTIONS described above are consistent with the guidance provided in Regulatory Guide 1.78, Revision 0, June 1974, "Assumptions for Evaluating the Habitability of a Nuclear Power Plant Control Room During a Postulated Hazardous Chemical Release," and Regulatory Guide 1.95. Regulatory Guide 1.78 states in Section C.3 that "... the release of any hazardous chemical to be stored on the nuclear plant site in a quantity greater than 100 lbs. should be considered..." for its impact on control room habitability. Catawba does not allow any gaseous chlorine containers greater than 100 lbs. on site. There are also no credible accident scenarios that would cause the failure of more than 100 lbs. of chlorine.

16.9 **AUXILIARY SYSTEMS**

16.9-22 **CONTROL ROOM AREA VENTILATION SYSTEM – INTAKE
ALARMS**

COMMITMENT:

The Control Room Area Ventilation Systems Intake Alarms shall be OPERABLE.

(This SLC applies to the Control Room Area Ventilation System radiation and smoke alarms only. The chlorine detection alarm is addressed in SLC 16.6-4.)

APPLICABILITY:

All MODES.

REMEDIAL ACTION: (Units 1 and 2)

MODES 1, 2, 3 and 4:

With the Control Room Area Ventilation System Intake Alarms inoperable restore the inoperable system to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

MODES 5 and 6:

With the Control Room Area Ventilation Systems Intake Alarms inoperable, suspend all operations involving CORE ALTERATIONS or positive reactivity changes.

NOTE: The provisions of SLC 16.2.3 are not applicable.

TESTING REQUIREMENTS:

The Control Room Area Ventilation System Intake Alarms shall be demonstrated OPERABLE at least once per 18 months by verifying that on a High Radiation-Air Intake, or Smoke Density-High test signal, an alarm is received in the control room.

REFERENCES:

1. Letter from NRC to Gary R. Peterson, Duke, Issuance of Improved Technical Specifications Amendments for Catawba, September 30, 1998.

BASES:

The Control Room Area Ventilation System Intake Alarms provide operator information relative to smoke and radiation concentrations at each control room intake. Operators use this information to align the Control Room Area Ventilation System to ensure that the control room will remain habitable for operations personnel during and following accident conditions.

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TABLE NOTATIONS

ACTION I - With the number of channels OPERABLE less than the Minimum Channels OPERABLE requirement, containment releases to the environment through this pathway may continue provided that prior to initiating the release:

- a. Vent system noble gas activity monitor providing alarm and automatic termination of release (Low Range – EMF-36) has at least one channel OPERABLE; or,
- b. At least two independent samples of the containment atmosphere are analyzed, and at least two technically qualified members of the facility independently verify:
 1. The discharge valve lineup; and
 2. The manual portion of the computer input for the release rate calculations performed on the computer, or the entire release rate calculations if such calculations are performed manually.

Restore the inoperable instrumentation to OPERABLE status within 30 days, or explain in the next Radioactive Effluent Release Report, pursuant to Technical Specification 5.6.3, why this inoperability was not corrected within the time specified.

If the instrumentation remains, or is anticipated to remain, inoperable for 90 days or longer, re-evaluate the configuration of the affected unit in accordance with the applicable portions of 10CFR50.59 and 10CFR50.65(a)(4), prior to expiration of the 90 days.