

February 14, 2005

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

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

License Amendment Request to Eliminate the
Requirements for the Hydrogen Recombiners
(Technical Specification 3.6.7) and the
Requirements for Hydrogen Monitors
(Technical Specification 3.3.3), Using the
Consolidated Line Item Improvement Process

Reference: Letter from Duke Energy Corporation to the NRC,
same subject, dated May 27, 2004

The reference letter transmitted Duke Energy Corporation (Duke) proposed license amendment request (LAR) for the Facility Operating Licenses and Technical Specifications (TS) for Catawba Nuclear Station Units 1 and 2. The proposed amendment eliminated the TS 3.6.7 requirements for the Hydrogen Recombiners and the TS 3.3.3 requirements for Hydrogen Monitors. Conforming changes were also made to all associated Bases affected by this LAR and these Bases changes were included in the submittal package. The change was consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-447, Rev. 1 (Elimination of Hydrogen Recombiners and Change to Hydrogen and Oxygen Monitors).

A001

On April 29, 2004, the NRC issued License Amendments 213 and 207 for Catawba Units 1 and 2, respectively. Subsequently, on January 13, 2005, the NRC issued License amendment 218 and 212 for Catawba Units 1 and 2, respectively. These amendments modified the TS Table of Contents, TS and Bases for 3.3.3 and the Bases only for 3.6.8. Consequently, these amendments revised the pages contained in the reference letter. The affected pages are being remarked and resubmitted to reflect the currently issued pages.

The resubmittal of the affected TS and Bases pages does not result in changes to the technical discussion associated with the reference letter. Additionally, there are no changes needed to the originally transmitted No Significant Hazards Consideration Analysis or Environmental Analysis.

There are no NRC commitments contained in this letter or its attachment.

Pursuant to 10 CFR 50.91, a copy of this amendment request is being sent to the appropriate State of South Carolina official.

Inquiries on this matter should be directed to A. Jones-Young at (803) 831-3051.

Very truly yours,



D. M. Jamil
Site Vice President

ATTACHMENT

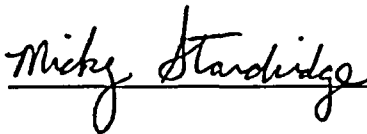
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D. M. Jamil, being duly sworn, affirms that he is the person who subscribed his name to the foregoing statement, and that all matters and facts set forth herein are true and correct to the best of his knowledge.



D. M. Jamil, Site Vice President

Subscribed and sworn to me: _____



_____, Notary Public

My commission expires: 7-10-2012



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xc (with attachments):

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ATTACHMENT 1

PROPOSED TECHNICAL SPECIFICATION and BASES CHANGES
(MARK-UP)

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3.3 INSTRUMENTATION

3.3.3 Post Accident Monitoring (PAM) Instrumentation

LCO 3.3.3 The PAM instrumentation for each Function in Table 3.3.3-1 shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

~~NOTE~~
~~The Hydrogen Monitors are not required in MODE 3.~~

ACTIONS

~~NOTE~~
Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more Functions with one or more required channels inoperable.	A.1 Enter the Condition referenced in Table 3.3.3-1 for the channel.	Immediately
B. One or more Functions with one required channel inoperable.	B.1 Restore required channel to OPERABLE status.	30 days
C. One or more Functions with one required channel inoperable. <u>AND</u> Diverse channel OPERABLE.	C.1 Restore required channel to OPERABLE status.	30 days

(continued)

BASES

APPLICABILITY (continued)

~~The Hydrogen Monitors are not required to be OPERABLE in MODE 3.~~

ACTIONS

A Note has been added in the ACTIONS to clarify the application of Completion Time rules. The Conditions of this Specification may be entered independently for each Function listed on Table 3.3.3-1. When the Required Channels in Table 3.3.3-1 are specified (e.g., on a per steam line, per loop, per SG, etc., basis), then the Condition may be entered separately for each steam line, loop, SG, etc., as appropriate. The Completion Time(s) of the inoperable channel(s) of a Function will be tracked separately for each Function starting from the time the Condition was entered for that Function.

A.1

Condition A applies to all PAM instrument Functions. Condition A addresses the situation when one or more required channels for one or more Functions are inoperable. The Required Action is to refer to Table 3.3.3-1 and take the appropriate Required Actions for the PAM instrumentation affected. The Completion Times are those from the referenced Conditions and Required Actions.

B.1

Condition B applies when one or more Functions have one required channel that is inoperable. Required Action A.1 requires restoring the inoperable channel to OPERABLE status within 30 days. The 30 day Completion Time is based on operating experience and takes into account the remaining OPERABLE channel, the passive nature of the instrument (no critical automatic action is assumed to occur from these instruments), and the low probability of an event requiring PAM instrumentation during this interval.

BASES

APPLICABILITY (continued)

In MODE 3 or 4, both the hydrogen production rate and the total hydrogen produced after a LOCA would be less than that calculated for the DBA LOCA. Also, because of the limited time in these MODES, the probability of an accident requiring the HSS is low. Therefore, the HSS is not required in MODE 3 or 4.

In MODES 5 and 6, the probability and consequences of a LOCA or steam line break (SLB) are reduced due to the pressure and temperature limitations in these MODES. Therefore, the HSS is not required in these MODES.

ACTIONS

A.1

With one HSS train inoperable, the inoperable train must be restored to OPERABLE status within 30 days. In this Condition, the remaining OPERABLE HSS train is adequate to perform the hydrogen mixing function. However, the overall reliability is reduced because a single failure in the OPERABLE train could result in reduced hydrogen mixing capability. The 30 day Completion Time is based on the availability of the other HSS train, the small probability of a LOCA or SLB occurring (that would generate an amount of hydrogen that exceeds the flammability limit), the amount of time available after a LOCA or SLB (should one occur) for operator action to prevent hydrogen accumulation from exceeding the flammability limit, and the availability of the hydrogen—~~recombiners and hydrogen ignitors.~~

B.1

If an inoperable HSS train cannot be restored to OPERABLE status within the required Completion Time, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours. The allowed Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging plant systems.
