Duke Power

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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

Revision Request to NUREG 0737 Item II.F.1 for Containment Hydrogen Monitors

The purpose of this letter is to request NRC approval to revise the NUREG 0737 II.F.1 Attachment 6 requirement to place the containment hydrogen monitors in service within 30-minutes of the initiation of a safety injection. This request is to remove the 30-minute time limit and allow the monitors to be placed in service when directed by the Emergency Procedures. Approval of this change will allow the operators to continue with accident mitigation activities that would otherwise be directed toward the hydrogen monitors.

NUREG 0737 was issued in 1980. The NUREG II.F.1 Attachment 6 discussion on Containment Hydrogen Monitor contained, in part, the following statement:

> If an indication is not available at all times, continuous indication and recording shall be functioning within 30 minutes of the initiation of safety injection.

Catawba committed to various aspects of NUREG 0737 in subsequent correspondence and the Catawba Safety Evaluation Report NUREG 0954 revision 0 dated February, 1983.

Subsequent NRC and industry review of the hydrogen monitoring system has re-evaluated the role of hydrogen mitigation systems during an accident. The Industry

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Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-447, Revision 1 contained the following statements:

> . . . The Commission has found that this hydrogen release is not risk significant because the design-basis LOCA hydrogen release does not contribute to the conditional probability of a large release up to approximately 24 hours after the onset of core damage.
>
> . . . Hydrogen monitoring is not the primary means of indicating a significant abnormal degradation of the reactor coolant pressure boundary. Section 4 of Attachment 2 to SECY-00-0198 found that hydrogen monitoring was not risk-significant.

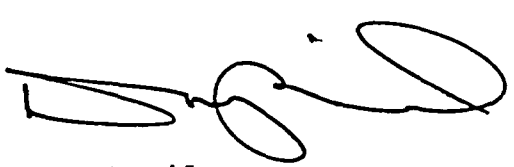
The NRC endorsed TSTF-447 within the Consolidated Line Item Improvement Process (CLIIP). On May 27, 2004, Duke Energy submitted the License Amendment Request incorporating the CLIIP / TSFT-447 to remove the hydrogen monitors from the Technical Specification. On March 1, 2005, the NRC approved the Duke May 27, 2004 submittal.

Based upon the above recent changes in NRC requirements for containment hydrogen monitoring, Duke requests NRC approval for relaxation of the NUREG 0737 requirement to place the monitors in service within 30-minutes. Hydrogen monitoring will continue to be included within the plant Emergency Procedures.

Approval of this change will not impact or contradict any discussions within the current Catawba Updated Final Safety Analysis Report. This letter does not contain any new regulatory commitments.

Questions regarding this letter should be directed to G. K. Strickland at 803-831-3585.

Sincerely,



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