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March 30, 2006

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

Subject: Duke Energy Corporation
Catawba Nuclear Station, Unit 2
Docket Number 50-414
Proposed Change to Technical Specification (TS) 5.5.9,
Steam Generator (SG) Program

Reference: Letters from Duke Energy Corporation to NRC, same
subject, dated February 2, 2006 and February 28,
2006.

The reference letters modified a proposed revision to the subject TS requirements. The amendment application proposed a revision to TS 5.5.9 to incorporate changes in the SG tube repair criteria during the Unit 2 End of Cycle 14 Refueling Outage and make it applicable for one cycle of operation (Cycle 15).

On March 30, 2006, a telephone discussion was held between Duke Energy Corporation and the NRC. As a result of this discussion, Duke Energy Corporation is clarifying the wording of the proposed change to TS 5.5.9.

Attachment 1 provides a re-marked copy of the affected TS pages for Catawba, showing the proposed changes. Attachment 2 provides a final copy of the affected TS page.

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The conclusions reached in the original determination that the amendment contains No Significant Hazards Considerations pursuant to 10 CFR 50.92, and the basis for the categorical exclusion from performing an Environmental Assessment/Impact Statement pursuant to 10 CFR 51.22(c)(9) have not been changed based on the information in the attachments to this letter.

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

Should you have any questions concerning this information, please call R.D. Hart at (803) 831-3622.

Very truly yours,

A handwritten signature in black ink, appearing to read 'D.M. Jamil', with a long horizontal stroke extending to the left.

D.M. Jamil

Attachments

RDH/s

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

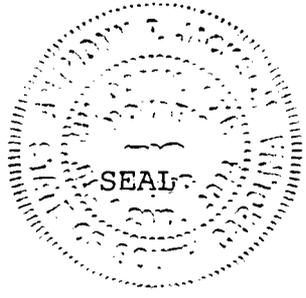


D.M. Jamil, Site Vice President

Subscribed and sworn to me: 3/30/06
Date

Anthony P. Jackson
Notary Public

My commission expires: 7/2/2014
Date



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xc (with attachments):

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ATTACHMENT 1

MARKED-UP TS PAGES FOR CATAWBA

5.5 Programs and Manuals

5.5.9 Steam Generator (SG) Program (continued)

condition of the tubing during a SG inspection outage, as determined from the inservice inspection results or by other means, prior to the plugging of tubes. Condition monitoring assessments shall be conducted during each outage during which the SG tubes are inspected or plugged to confirm that the performance criteria are being met.

- b. Performance criteria for SG tube integrity. SG tube integrity shall be maintained by meeting the performance criteria for tube structural integrity, accident induced leakage, and operational LEAKAGE.
1. Structural integrity performance criterion: All inservice SG tubes shall retain structural integrity over the full range of normal operating conditions (including startup, operation in the power range, hot standby, and cooldown, and all anticipated transients included in the design specification) and design basis accidents. This includes retaining a safety factor of 3.0 against burst under normal steady state full power operation primary to secondary pressure differential and a safety factor of 1.4 against burst applied to the design basis accident primary to secondary pressure differentials. Apart from the above requirements, additional loading conditions associated with the design basis accidents, or combination of accidents in accordance with the design and licensing basis, shall also be evaluated to determine if the associated loads contribute significantly to burst or collapse. In the assessment of tube integrity, those loads that do significantly affect burst or collapse shall be determined and assessed in combination with the loads due to pressure with a safety factor of 1.2 on the combined primary loads and 1.0 on axial secondary loads.
 2. Accident induced leakage performance criterion: The primary to secondary accident induced leakage rate for any design basis accident, other than a SG tube rupture, shall not exceed the leakage rate assumed in the accident analysis in terms of total leakage rate for all SGs and leakage rate for an individual SG. Leakage is not to exceed 150 gallons per day through each SG for a total of 600 gallons per day through all SGs.
 3. The operational LEAKAGE performance criterion is specified in LCO 3.4.13, "RCS Operational LEAKAGE."
- c. Provisions for SG tube repair criteria. Tubes found by inservice inspection to contain flaws with a depth equal to or exceeding 40% of the nominal tube wall thickness shall be plugged.

Insert →

(continued)

INSERT for TS 5.5.9c.

The following alternate tube repair criteria may be applied as an alternative to the 40% depth based criteria:

1. For the Unit 2 End of Cycle 14 Refueling Outage and Cycle 15 operation only, the 40% depth based criterion does not apply to degradation identified in the portion of the tube below 17 inches from the top of the tubesheet. If degradation is identified in the portion of the tube from the top of the tubesheet to 17 inches below the top of the tubesheet, the tube shall be removed from service. If degradation is found in the portion of the tube below 17 inches from the top of the tubesheet, the tube does not require plugging.

ATTACHMENT 2

FINAL TYPED PAGES

5.5 Programs and Manuals

5.5.9 Steam Generator (SG) Program (continued)

The following alternate tube repair criteria may be applied as an alternative to the 40% depth based criteria:

1. For the Unit 2 End of Cycle 14 Refueling Outage and Cycle 15 operation only, the 40% depth based criterion does not apply to degradation identified in the portion of the tube below 17 inches from the top of the tubesheet. If degradation is identified in the portion of the tube from the top of the tubesheet to 17 inches below the top of the tubesheet, the tube shall be removed from service. If degradation is found in the portion of the tube below 17 inches from the top of the tubesheet, the tube does not require plugging.

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