



D.M. JAMIL
Vice President

Catawba Nuclear Station
4800 Concord Rd. / CN01VP
York, SC 29745-9635

803 831 4251
803 831 3221 fax

August 8, 2006

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

Subject: Duke Power Company LLC d/b/a Duke Energy
Carolinas, LLC (Duke)

McGuire Nuclear Station, Units 1 and 2
Docket Nos. 50-369 and 50-370

Catawba Nuclear Station, Units 1 and 2
Docket Nos. 50-413 and 50-414

Supplement to a License Amendment Request for
McGuire and Catawba Technical Specification
3.4.15, RCS Leakage Detection Instrumentation.

Reference: Letter from Duke Energy Corporation to the
NRC, Dated July 27, 2005

Letter from Duke Power Company LLC d/b/a Duke
Energy Carolinas, LLC to the NRC, dated
May 4, 2006

In response to a telecon between the NRC and Duke on
August 2, 2006, enclosed are revised portions of License
Amendment Request (LAR) Attachments 1a and 1b for Required
Action C and Bases. These Attachments replace the
corresponding sections from the referenced May 4, 2006 LAR
submittal.

The two changes from the May 4, 2006 submittal are:

1. A new Required Action C.2 is inserted to state "During
Modes 2, 3, and 4, restore inoperable containment
ventilation unit condensate drain tank level monitor to
OPERABLE status," with a corresponding Completion Time
of 30 days. Additionally, the Required Actions for
Condition C are renumbered to conform to formatting
requirements.
2. A discussion of Action C.2 is included in the Bases.

U.S. Nuclear Regulatory Commission
Page 2
August 8, 2006

The additional changes to TS 3.4.15 are described in the May 4, 2006 letter.

The May 4, 2006 submittal proposed revising the containment atmosphere particulate radioactivity monitor applicability to Mode 1 only. This change is based on improved fuel integrity and reduced reactor coolant system (RCS) radioactivity levels that results in the radiation monitors being less effective in detecting leakage below Mode 1 conditions. In Mode 1, water activation products build into equilibrium rapidly within the RCS, and provide a significant source term for detection of system leakage.

The previous conclusions of the No Significant Hazards Consideration and Environmental Analysis as stated in the May 4, 2006 submittal are not affected by this response.

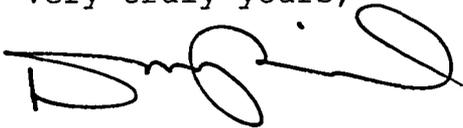
The changes to the Updated Final Safety Analysis Report will be incorporated in the next available UFSAR update following the approval of the license amendment request. The change to the UFSAR will be made in accordance with 10CFR50.71.

Pursuant to 10 CFR 50.91, a copy of this letter is being sent to the designated official of the State of North Carolina and the designated official of the State of South Carolina.

This letter and attachments do not contain any new NRC commitments.

Inquiries on this matter should be directed to G.K. Strickland at (803) 831-3585 or J.S. Warren at (704) 875-5171.

Very truly yours,

A handwritten signature in black ink, appearing to read 'D.M. Jamil', written over a horizontal line.

D.M. Jamil

U.S. Nuclear Regulatory Commission
Page 3
August 8, 2006

xc (with attachment):

W.D. Travers
U.S. Nuclear Regulatory Commission
Regional Administrator, Region II
Atlanta Federal Center
61 Forsyth St., SW, Suite 23T85
Atlanta, GA 30303

E.F. Guthrie
Senior Resident Inspector (CNS)
U.S. Nuclear Regulatory Commission
Catawba Nuclear Station

J.B. Brady
Senior Resident Inspector (MNS)
U.S. Nuclear Regulatory Commission
McGuire Nuclear Station

J.F. Stang (addressee only)
NRC Project Manager (MNS and CNS)
U.S. Nuclear Regulatory Commission
One White Flint North, Mail Stop 8 H4A
11555 Rockville Pike
Rockville, MD 20852-2738

H.J. Porter
Assistant Director
Department of Health and Environmental Control
2600 Bull St.
Columbia, SC 29201

B.O. Hall
Section Chief
Radiation Protection Section
1645 Main Service Center
Raleigh, NC 27699-1645

U.S. Nuclear Regulatory Commission

Page 4

August 8, 2006

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.

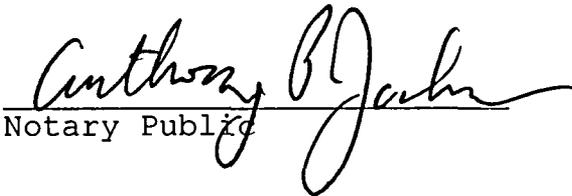


D.M. Jamil, Vice President

Subscribed and sworn to me:

8/8/06

Date



Notary Public

My commission expires:

7/2/2014

Date

SEAL

Attachment 1a

McGuire Units 1 and 2

Proposed Technical Specifications and Bases (Mark-up)

McGuire revised TS 3.4.15 Condition C

<p>C. Containment ventilation unit condensate drain tank level monitor inoperable.</p>	<p>C.1.1 ----- - NOTE - <i>Not required until 12 hours after establishment of steady state operation</i> -----</p> <p>Perform SR 3.4.13.1.</p> <p><u>OR</u></p> <p>C.1.2 Analyze grab samples of the containment atmosphere.</p> <p><u>OR</u></p> <p>C.1.3 Perform SR 3.4.15.1.</p> <p><u>AND</u></p> <p>C.2 During Modes 2, 3, and 4, restore inoperable containment ventilation unit condensate drain tank level monitor to OPERABLE status.</p>	<p>Once per 24 hours</p> <p>Once per 24 hours.</p> <p>Once per 8 hours</p> <p>30 days</p>
--	--	---

McGuire revised Bases for TS 3.4.15 Condition C

C.1.1, C.1.2, C.1.3 and C.2

With the CVUCDT level monitor inoperable, alternative action is again required. Either a water inventory balance, in accordance with SR 3.4.13.1; or grab samples obtained and analyzed at a frequency of 24 hours; or SR 3.4.15.1, CHANNEL CHECK, of the containment atmosphere particulate radioactivity monitor at 8-hour intervals, must be performed to provide alternate periodic information. Required Action C.1.1 is modified by a Note that states the RCS water inventory balance is not required to be performed until 12 hours after establishment of steady state operation in accordance with SR 3.4.13.1. This Note allows exceeding the 24-hour completion time during non-steady state operation.

Provided a water inventory balance is performed every 24 hours; or grab samples taken and analyzed every 24 hours; or a CHANNEL CHECK of the containment atmosphere particulate radioactivity monitor is performed every 8 hours, reactor operation may continue while awaiting restoration of the CVUCDT level monitor to OPERABLE status. The 24 and 8 hour intervals provide periodic information that is adequate to detect RCS LEAKAGE.

During Modes 2, 3, and 4, restoration of the CVUCDT level monitor to OPERABLE status within a Completion Time of 30 days is required to regain the function after the monitor's failure. This time is acceptable, considering the Frequency and adequacy of the alternative actions required by Actions C.1.1, C.1.2, or C.1.3.

During Modes 2, 3, and 4, the two required leakage detection instrumentation systems are the CVUCDT level monitor and the CFAE sump level monitors. When the CVUCDT level monitor is inoperable, a plant shutdown after 30 days will ensure the plant will not operate with less than two leakage detection systems operable for an extended period of time. During Mode 1, the addition of the third leakage monitoring system from the containment atmosphere particulate radioactivity monitor provides additional leakage detection capability and no longer requires plant shutdown except as described in Condition D.

Attachment 1b

Catawba Units 1 and 2

Proposed Technical Specifications and Bases (Mark-up)

Catawba revised TS 3.4.15 Condition C

<p>C. Required Containment ventilation unit condensate drain tank level monitor inoperable.</p>	<p>C.1.1 ----- - NOTE - <i>Not required until 12 hours after establishment of steady state operation</i> -----</p> <p>Perform SR 3.4.13.1.</p> <p><u>OR</u></p> <p>C.1.2 <i>Analyze grab samples of the containment atmosphere.</i></p> <p><u>OR</u></p> <p>C.1.3 Perform SR 3.4.15.1.</p> <p><u>AND</u></p> <p>C.2 <i>During Modes 2, 3, and 4, restore inoperable containment ventilation unit condensate drain tank level monitor to OPERABLE status.</i></p>	<p>Once per 24 hours</p> <p>Once per 24 hours</p> <p>Once per 8 hours</p> <p>30 days</p>
---	--	--

Catawba revised Bases for TS 3.4.15 Condition C

C.1.1, C.1.2, C.1.3, and C.2

With the CVUCDT level monitor inoperable, alternative action is again required. Either a water inventory balance, in accordance with SR 3.4.13.1; or grab samples obtained and analyzed at a frequency of 24 hours; or SR 3.4.15.1, CHANNEL CHECK, of the containment atmosphere particulate radioactivity monitor at 8-hour intervals, must be performed to provide alternate periodic information. Required Action C.1.1 is modified by a Note that states the RCS water inventory balance is not required to be performed until 12 hours after establishment of steady state operation in accordance with SR 3.4.13.1. This Note allows exceeding the 24-hour completion time during non-steady state operation.

Provided a water inventory balance is performed every 24 hours; or grab samples taken and analyzed every 24 hours; or a CHANNEL CHECK of the containment atmosphere particulate radioactivity monitor is performed every 8 hours, reactor operation may continue while awaiting restoration of the CVUCDT level monitor to OPERABLE status. The 24 and 8 hour intervals provide periodic information that is adequate to detect RCS LEAKAGE.

During Modes 2, 3, and 4, restoration of the CVUCDT level monitor to OPERABLE status within a Completion Time of 30 days is required to regain the function after the monitor's failure. This time is acceptable, considering the Frequency and adequacy of the alternative actions required by Actions C.1.1, C.1.2, or C.1.3.

During Modes 2, 3, and 4, the two required leakage detection instrumentation systems are the CVUCDT level monitor and the CFAE sump level monitors. When the CVUCDT level monitor is inoperable, a plant shutdown after 30 days will ensure the plant will not operate with less than two leakage detection systems operable for an extended period of time. During Mode 1, the addition of the third leakage monitoring system from the containment atmosphere particulate radioactivity monitor provides additional leakage detection capability and no longer requires plant shutdown except as described in Condition D.