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April 26, 2007

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

Subject: Duke Power Company LLC d/b/a Duke Energy
Carolinas, LLC (Duke)
Catawba Nuclear Station, Units 1 and 2
Docket Numbers 50-413 and 50-414
Inservice Testing (IST) Program for
Pumps and Valves - Third Ten-Year
Interval Plan
TAC Numbers MD3526 and MD3527

Reference: Letter from Duke to NRC, same
subject, dated August 15, 2006

Pursuant to 10 CFR 50.55a(f)(5)(i), the reference letter submitted Revision 27 of the Catawba IST Program. Part of this submittal consisted of Relief Request Number CN-SRP-CA-01, concerning Auxiliary Feedwater System pump suction pressure analog gauges. On February 21 and April 9, 2007, the NRC electronically transmitted Requests for Additional Information (RAIs) regarding this relief request. The purpose of this letter is to respond to these RAIs.

The attachment to this letter contains Catawba's response. The format of the attachment is to restate each RAI question, followed by Catawba's response.

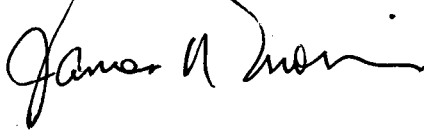
Duke requests that the NRC review and approve this relief request at your earliest convenience.

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

If you have any questions concerning this material, please call L.J. Rudy at (803) 831-3084.

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Very truly yours,

A handwritten signature in black ink, appearing to read "James R. Morris". The signature is fluid and cursive, with a long horizontal stroke at the end.

James R. Morris

LJR/s

Attachment

xc (with attachment):

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

A.T. Sabisch, Senior Resident Inspector
U.S. Nuclear Regulatory Commission
Catawba Nuclear Station

J.F. Stang, Jr., Senior Project Manager (addressee only)
U.S. Nuclear Regulatory Commission
Mail Stop 8-H4A
Washington, D.C. 20555-0001

Attachment

Response to Request for Additional Information

REQUEST FOR ADDITIONAL INFORMATION
RELIEF REQUEST FOR THE THIRD 10-YEAR PUMP AND VALVE
INSERVICE TESTING PROGRAM
CATAWBA NUCLEAR STATION UNITS 1 AND 2
DOCKET NOS. 50-413 AND 50-414
TAC NOS. MD3526 AND MD3527

1. Relief Request CN-SRP-CA-01

RAI CN-SRP-CA-01-01

Please state whether these pumps are classified as Group A or Group B pumps.

Catawba Response:

This Relief Request is for the Motor Driven Auxiliary Feedwater Pumps (Catawba designation "CA") and these pumps are classified as Group B pumps.

RAI CN-SRP-CA-01-02

Please state for which testing this relief request is applicable (i.e., Group A, Group B, Comprehensive, Preservice testing).

Catawba Response:

The testing for which this Relief Request applies is quarterly Group B tests.

RAI CN-SRP-CA-01-03

The relief request states that the local gauge is the preferred location for reading the suction pressure during performance testing. Please confirm that only the local gauges will be used during performance testing of these pumps, and that the remote (control room) gauges will not be used during performance testing of these pumps.

Catawba Response:

It is desirable to maintain both sets of process gauges, local and remote, for the quarterly surveillance testing. Although the local gauge is the preferred choice for the quarterly surveillance, both

the local and control room gauges have accuracies within the requirements of OMa-1999, subsection ISTB, Table 3500-1. Relief is being requested because the local gauges do not meet the Code required limit of no more than three times the reference value for the full scale reading of the gauge. Test gauges of the correct accuracy would be required for the biennial comprehensive testing.

RAI CN-SRP-CA-01-04

The relief request states that the local suction pressure gauges have 0.5% error, and the control room suction pressure gauges have 1.12% error. Please confirm that 0.5% error is equivalent to 0.5% accuracy and 1.12% error is equivalent to 1.12% accuracy (i.e., the word "error" is equivalent to the word "accuracy").

Catawba Response:

The "error" referred to in the relief request is equivalent to accuracy. Local and remote gauges have 0.5% and 1.12% accuracy, respectively.

RAI CN-SRP-CA-01-05

Explain how the proposed use of either the local or remote suction pressure gauges for the quarterly surveillance tests meets the requirements of ISTB-3510(c).

Catawba Response:

The gauges are calibrated to their piping instrument tap and readings are water leg adjusted for the difference between the tap and pump centerline. Both gauges come off of the same piping tap. The only difference then is the error associated with the gauge reading itself. The difference in suction pressure between using the 1.12% error gauge and the 0.5% error gauge is approximately 0.2 psi, which is negligible from both absolute and trending standpoints when differential pressures are in the range of 1550 psid.

RAI CN-SRP-CA-01-06

Explain how trending of pump performance can be effectively accomplished if the same gauges are not used in the quarterly surveillance tests.

Catawba Response:

See response to RAI CN-SRP-CA-01-05.