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August 27, 2007

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

Subject: Duke Energy Corporation Catawba Nuclear Station Docket Nos. 50-413 and 50-414 UFSAR/Selected Licensee Commitment Changes

Pursuant to 10CFR 50.71(e), please find attached changes to the Catawba Nuclear Station Selected Licensee Commitments Manual. This document constitutes Chapter 16 of the Updated Final Safety Analysis Report (UFSAR).

Any questions regarding this information should be directed to A.P. Jackson, Regulatory Compliance, at (803) 831-3742.

I certify that I am a duly authorized officer of Duke Energy Corporation, and that the information contained herein accurately represents changes made to Chapter 16 of the UFSAR since the previous submittal.

James R. Morris

Attachment

U.S. Nuclear Regulatory Commission August 27, 2007 Page 2

xc: W. D. Travers, Regional Administrator U. S. Nuclear Regulatory Commission, Region II

J.F. Stang Jr., NRC Project Manager (CNS) U.S. Nuclear Regulatory Commission

A.T. Sabisch, Senior Resident Inspector Catawba Nuclear Station



DUKE ENERGY CORPORATION Catawba Nuclear Station 4800 Concord Road York, SC 29745

803 831 3000

August 20, 2007

RE: Catawba Nuclear Station

Selected Licensee Commitments Manual

Revision Date 07/18/07

Attached are revisions to the Catawba Nuclear Station Selected Licensee Commitments Manual. Please remove and replace the following pages:

#### REMOVE

### **INSERT**

#### LIST OF EFFECTIVE SECTIONS

Pages 1 through 4 Revision 32 Pages 1 through 4 Revision 33

#### TAB 16.9

16.9-25-1 through 16.9-25-3 Revision 0 16.9-25-1 through 16.9-25-3 Revision 1

If you have any questions concerning the contents of this package update, please contact Betty Aldridge at (803) 831-3758.

Candell & Cart

Randall D. Hart Regulatory Compliance Manager

Attachments

| SECTION           | REVISION NUMBER | REVISION DATE |
|-------------------|-----------------|---------------|
| TABLE OF CONTENTS | 9               | 03/08/07      |
| 16.1              | 0               | 10/09/02      |
| 16.2              | 1               | 10/17/02      |
| 16.3              | 0               | 10/09/02      |
| 16.5-1            | 1               | 10/24/06      |
| 16.5-2            | Deleted         |               |
| 16.5-3            | 1               | 02/20/04      |
| 16.5-4            | 0               | 10/09/02      |
| 16.5-5            | 0               | 10/09/02      |
| 16.5-6            | 0               | 10/09/02      |
| 16.5-7            | 0               | 10/09/02      |
| 16.5-8            | 1               | 05/18/04      |
| 16.5-9            | 0               | 10/24/06      |
| 16.5-10           | 0               | 03/08/07      |
| 16.6-1            | 0               | 10/09/02      |
| 16.6-2            | Deleted         |               |
| 16.6-3            | 0               | 10/09/02      |
| 16.6-4            | 0               | 10/09/02      |
| 16.6-5            | 0               | 10/09/02      |
| 16.7-1            | 0               | 10/09/02      |
| 16.7-2            | 1               | 08/20/04      |
| 16.7-3            | 0               | 10/09/02      |
| . 16.7-4          | 0               | 10/09/02      |
| 16.7-5            | 1               | 01/02/03      |

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|---------|-----------------|---------------|
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| 16.7-8  | 1               | 05/25/05      |
| 16.7-9  | 4               | 02/01/05      |
| 16.7-10 | 0               | 10/09/02      |
| 16.7-11 | 0               | 10/09/02      |
| 16.7-12 | 0               | 10/09/02      |
| 16.7-13 | 1               | 05/17/06      |
| 16.7-14 | 0               | 10/06/03      |
| 16.7-15 | 0               | 03/01/05      |
| 16.8-1  | 1               | 02/01/05      |
| 16.8-2  | 1               | 10/24/06      |
| 16.8-3  | 1               | 10/24/06      |
| 16.8-4  | 1               | 10/24/06      |
| 16.8-5  | 2               | 02/20/04      |
| 16.9-1  | 4               | 08/03/06      |
| 16.9-2  | 3               | 05/25/05      |
| 16.9-3  | 0               | 10/09/02      |
| 16.9-4  | 2               | 05/25/05      |
| 16.9-5  | 3               | . 05/17/06    |
| 16.9-6  | 3               | 10/24/06      |
| 16.9-7  | 3               | 03/10/04      |
| 16.9-8  | 4               | 10/24/06      |
| 16.9-9  | 2               | 03/10/04      |
|         |                 |               |

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|---------|------------------------|----------------------|
| 16.9-10 | 4                      | 10/24/06             |
| 16.9-11 | 2                      | 03/10/04             |
| 16.9-12 | 1                      | 03/10/04             |
| 16.9-13 | 1                      | 03/19/07             |
| 16.9-14 | 1                      | 09/25/06             |
| 16.9-15 | 0                      | 10/09/02             |
| 16.9-16 | 0                      | 10/09/02             |
| 16.9-17 | 0                      | 10/09/02             |
| 16.9-18 | 0                      | 10/09/02             |
| 16.9-19 | 1                      | 01/02/03             |
| 16.9-20 | 0                      | 10/09/02             |
| 16.9-21 | 0                      | 10/09/02             |
| 16.9-22 | 0                      | 10/09/02             |
| 16.9-23 | 2                      | 05/25/05             |
| 16.9-24 | 2                      | 10/24/06             |
| 16.9-25 | 1                      | 07/18/07             |
| 16.10-1 | 0                      | 10/09/02             |
| 16.10-2 | 1                      | 10/24/06             |
| 16.10-3 | 0                      | 08/21/03             |
| 16.11-1 | 0                      | 10/09/02             |
| 16.11-2 | 0                      | 10/09/02             |
| 16.11-3 | 0                      | 10/09/02             |
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| 16.11-5 | 0                      | 10/09/02             |
|         |                        |                      |

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|----------|-----------------|---------------|
| 16.11-6  | 0               | 10/09/02      |
| 16.11-7  | 1               | 02/27/03      |
| 16.11-8  | 0               | 10/09/02      |
| 16.11-9  | 0               | 10/09/02      |
| 16.11-10 | 0               | 10/09/02      |
| 16.11-11 | 1               | 03/20/03      |
| 16.11-12 | 0               | 10/09/02      |
| 16.11-13 | 0               | 10/09/02      |
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| 16.12-1  | 0               | 10/09/02      |
| 16.13-1  | 0               | 10/09/02      |
| 16.13-2  | Deleted         |               |
| 16.13-3  | Deleted         |               |
| 16.13-4  | 0               | 10/09/02      |

### 16.9 AUXILIARY SYSTEMS

16.9-25 Tornado Isolation Dampers

COMMITMENT a. Tornado Isolation Dampers shall be closed when tornado isolation is initiated.

### <u>AND</u>

b. Auxiliary Building Filtered Ventilation Exhaust System (ABFVES) supply unit inlet dampers and Fuel Handling Ventilation Exhaust System (FHVES) exhaust outlet dampers shall remain closed for at least 15 minutes following tornado isolation initiation.

APPLICABILITY: At all times.

### **REMEDIAL ACTIONS**

SLC 16.2.2 is not applicable for only one inoperable Tornado Isolation Damper.

|    | CONDITION  |     | REQUIRED ACTION  | COMPLETION TIME |
|----|--|-----|--|-----------------|
| Α. | More than one Tornado<br>Isolation Damper<br>inoperable. | A.1 | Restore all but one<br>Tornado Isolation Damper<br>to OPERABLE status. | 90 days         |

#### **TESTING REQUIREMENTS**

|              | TEST  | FREQUENCY |
|--------------|---|-----------|
| TR 16.9-25-1 | NOTE<br>This TR shall be performed during PT/0/A/4450/019A<br>and PT/0/A/4450/019B.<br> | 12 months |

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BASES Tornado Isolation Dampers are provided to prevent significant depressurization of the Auxiliary Building during a tornado. These dampers are operated per RP/0/A/5000/007, Natural Disaster and Earthquake. With one Tornado Isolation Damper inoperable, no action is required per CNC-1206.03-00-0101.

> There is no measurable risk increase posed by having multiple (or all) Tornado Isolation Dampers inoperable. These dampers are not modeled in the Catawba Probabilistic Risk Analysis (PRA) because their failure was judged not to affect any important accident mitigation functions credited in the PRA.

> In order to affect a PRA accident mitigation function, a damper failure would have to have the potential to initiate (or increase the likelihood of) a plant transient or Loss of Coolant Accident (LOCA), fail a structure, system, or component (SSC) modeled in the PRA, or adversely affect operator actions credited in the PRA. This is not the case for these dampers.

There is no credible mechanism postulated by which the Tornado Isolation Dampers could cause a plant transient or LOCA.

The conclusions of CNC-1206.03-00-0101 state that "... the HVAC Tornado Isolation System is not required for the protection of the Auxiliary Building." This conclusion was reached by calculating the maximum pressure differential that could be caused by a design basis tornado (0.35 psid) and determining that no civil structures or any electrical or mechanical equipment inside the Auxiliary Building could be adversely impacted by this differential pressure. Thus, no SSC modeled in the PRA could be affected either.

Because the failure or inoperability of Tornado Isolation Dampers does not adversely impact any initiator, SSC, or operator action credited in the PRA, it is concluded that their inoperability has no measurable impact on plant risk. This conclusion applies even if all of the dampers are inoperable at the same time. This indicates that there are no measurable benefits of imposing OPERABILITY restrictions for these dampers. The risk impact suggests that the Tornado Isolation Dampers could receive a very lenient treatment if any OPERABILITY requirements are imposed. Thus, a Completion Time of 90 days is utilized as a reasonable expectation for restoring inoperable dampers using the normal work scheduling process.

- REFERENCES 1. CNC-1206.03-00-0101, Auxiliary Building Depressurization Due to a Postulated Tornado Event.
  - 2. PT/0/A/4450/019A, Tornado Isolation Train A Test.
  - 3. PT/0/A/4450/019B, Tornado Isolation Train B Test.

### REFERENCES (continued)

- 4. RP/0/A/5000/007, Natural Disaster and Earthquake.
- 5. Problem Investigation Process (PIPs) C-03-03898 and C-05-05652.
- 6. Regulatory Guide 1.76, Design Basis Tornado for Nuclear Power Plants, April 1974.