



Kelvin Henderson
Vice President
Catawba Nuclear Station

Duke Energy
CNO1VP | 4800 Concord Road
York, SC 29745

o: 803.701.4251
f: 803.701.3221

CNS-15-031

March 24, 2015

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

Subject: Duke Energy Carolinas, LLC (Duke)
Catawba Nuclear Station, Units 1 and 2
Docket Nos.: 50-413 and 50-414
Commitment Change Evaluation Report for 2014

Attached is a summary of commitment change evaluations completed during the 2014 calendar year for Catawba Nuclear Station. These evaluations and subsequent commitment changes were made based on the guidance defined in NEI 99-04, *Guidelines for Managing NRC Commitments*, and have no adverse effect on compliance with NRC rules and regulations.

Questions regarding this report should be directed to Cecil Fletcher, Regulatory Affairs Manager, at 803-701-3622.

Sincerely,

Kelvin Henderson
Vice President, Catawba Nuclear Station

Attachment

ADD
MIR

U. S. Nuclear Regulatory Commission
March 24, 2015
Page 2

xc:

V. M. McCree, Regional Administrator
U.S. Nuclear Regulatory Commission, Region II
Marquis One Tower
245 Peachtree Center Ave., NE Suite 1200
Atlanta, GA 30303-1257

G. Edward Miller
NRC Project Manager
U.S. Nuclear Regulatory Commission
One White Flint North, Mail Stop 8-G9A
11555 Rockville Pike
Rockville, MD 20852-2738

G. A. Hutto
Senior Resident Inspector
CN01NC

Catawba Nuclear Station
Annual Commitment Change Summary Report for 2014
Docket Nos. 50-413 and 50-414

NRC Notification Required	Number	Source Document	Original Commitment	Modified Commitment
Yes	2014-C-001	NRC Generic Letter Response (November 27, 1997) and Commitment Change #2002-C-005	The intake and pit inspections will be performed on a three year frequency commencing from the last RN intake and Train B pump pit inspection conducted on 4/24/02.	<p>Defer the inspection of Nuclear Service Water (RN) Pump Pit A to no later than 11/20/2014. This is a one-time deferral.</p> <p>The inspection of the A train RN Pump Pit is due 07/07/2014. This inspection was scheduled for March of 2014 but could not be performed due to issues with providing adequate isolation of the pit. In order to minimize safety system unavailability, this inspection will be performed during scheduled valve maintenance which will require A train of RN to be removed from service.</p> <p>The most recent A train pit inspection was performed during refueling outage 1EOC17, October, 2010. No structural issues were identified with the condition of the pit and associated structures, as documented in the work order completion comments.</p> <p>The A and B train pits are operated in the same manner. Therefore, the condition of the B train pit is considered to be indicative of the condition of the A pit. The latest inspection of the B pit was performed in February, 2012. The results of that inspection concluded that no structural issues were present with respect to concrete, structural steel or the intake screens. As noted in the Corrective Action Program, the pit was in very good condition (C-12-1403). This indicates the A pit is also in a similar</p>

NRC Notification Required	Number	Source Document	Original Commitment	Modified Commitment
				<p>condition.</p> <p>Therefore, deferring the next committed A train pump pit inspection by four months (11/30/14) to minimize safety system unavailability will not result in any potential challenge of the A train of the RN system from being capable of meeting its design basis requirements.</p> <p>This deferral is only applicable to this single occurrence.</p>
Yes	2014-C-002	Letter from Thomas P. Harrall, Duke Energy, to NRC, dated October 13, 2008, "Generic Letter 2008-01, 9-Month Response"	Monitor the status of the TSTF effort to provide revisions to NUREG-1431 Technical Specifications and their associated Bases in regard to the periodic venting surveillance. Catawba will evaluate the resolution of TS issues with respect to the changes contained in the TSTF traveler, and submit a license amendment request based on this evaluation within 180 days following NRC approval of the TSTF.	<p>Complete the evaluation of TSTF-523 and submit a letter to the NRC providing a schedule for submittal of a License Amendment Request by October 15, 2014.</p> <p>Duke Energy's evaluation of TSTF-523 is continuing. Additional time is needed to complete the evaluation, and to prepare, process, and submit an LAR. Therefore, Duke Energy is revising the commitments to complete the evaluation and provide a schedule for submittal of an LAR by October 15, 2014. Duke Energy believes that the actions completed in response to Generic Letter 2008-01 provide confidence that safety will be preserved during the extended evaluation period that the revised regulatory commitments afford.</p>
Yes	2014-C-003	Letter from Bill Pitesa, Duke Energy, to NRC dated April 15, 2011, "License Amendment Request for Cyber Security Plan"	Implementation Milestone 8 of the Cyber Security Plan is to Complete Operational and Management controls as provided in NEI 08-09, Rev. 6, Appendix E, by June 30, 2015.	<p>Revise Implementation Milestone 8 completion date of June 30, 2015, to December 31, 2017.</p> <p>The scope of the Critical Digital Asset (CDA) assessment activities was substantially underestimated by Duke</p>

NRC Notification Required	Number	Source Document	Original Commitment	Modified Commitment
				<p>Energy. The Milestone 8 completion date was established prior to any significant work being performed on program implementation; therefore, the scope of the assessment activities was not fully appreciated. The scope of the CDA assessment activities was also substantially underestimated by the industry in general, as evidenced by the need for additional industry guidance. Therefore, Duke Energy (DEC) is revising the commitment for Milestone 8 completion date of June 30, 2015, to December 31, 2017. Milestone 8 pertains to the date that complete operational and management controls, as provided in Nuclear Energy Institute 08-09, Revision 6, Appendix E, will be achieved. Based on the status of the cyber security program, Duke Energy believes that safety will be preserved during the approval period that the revised regulatory commitments afford.</p>