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DUKE POWER

August 17, 1995

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

Subject: Catawba Nuclear Station, Units 1 and 2
Docket Nos. 50-413 and 50-414
Proposed Technical Specifications (TS) Changes
Delete the Requirement to Calibrate the Reactor Coolant System Flowrate
Measurement Instrumentation

Gentlemen:

Pursuant to 10CFR50.4 and 10CFR50.90, attached are license amendment requests to Appendix A, Technical Specifications, of Facility Operating Licenses NPF-35 and NPF-52 for Catawba Nuclear Station Units 1 and 2, respectively.

The proposed amendments modify TS Surveillance Requirement (SR) 4.2.5.2 to delete the requirement to calibrate the reactor coolant system (RCS) flowrate measurement instrumentation within 7 days prior to the performance of the flow measurement.

Attachment 1 contains a background and description of the enclosed amendment request. Attachment 2 contains the required justification and safety evaluation. Pursuant to 10CFR50.91, Attachment 3 provides the analysis performed in accordance with the standards contained in 10CFR50.92 which concludes that the requested amendments do not involve a significant hazards consideration. Attachment 3 also contains an environmental impact analysis for the requested amendments. Attachment 4 contains the marked-up TS amendment pages for Catawba. Duke Power Company is forwarding a copy of this amendment request package to the appropriate South Carolina state official.

As a result of Amendment Nos. 128 and 122 for Units 1 and 2, respectively, Catawba now utilizes a RCS flowrate measurement method based on a one-time calibration of the cold leg elbow differential pressure taps. This method replaced the previous method which involved a precision calorimetric heat balance. In Catawba's original January 10, 1994 application, as amended, pertaining to Amendment Nos. 128/122, Catawba failed to modify SR 4.2.5.2 to delete that portion

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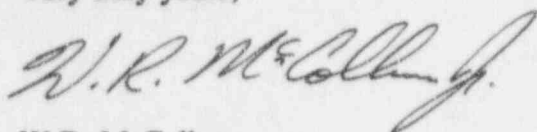
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of the SR which specifies that the measurement instrumentation shall be calibrated within 7 days prior to the performance of the flowrate measurement. This portion of the SR should have been deleted at the time the January 10, 1994 amendment application was submitted because it only applied to the precision calorimetric heat balance method of RCS flowrate measurement.

On April 3, 1995, following the completion of the Unit 1 end-of-cycle 8 refueling outage, the 18-month surveillance pursuant to SR 4.2.5.3 was performed on Unit 1 using the cold leg elbow tap method of flowrate measurement. Credit was not taken for SR 4.2.5.3 at the time it was performed, since the requirement to calibrate the RCS flowrate measurement instrumentation within 7 days of the performance of the surveillance could not be met due to the fact that this requirement is not applicable to the cold leg elbow tap method of RCS flowrate measurement. Approval of this amendment request is therefore necessary to allow credit to be taken for the April 3, 1995 surveillance. The latest date on which the next required performance of SR 4.2.5.3 becomes due, including grace time, is February 14, 1996. Duke Power Company is therefore requesting NRC approval of this amendment request by January 1, 1996. In addition, Duke Power Company is requesting a thirty-day period following NRC approval of the proposed amendments to allow for implementation.

Should there be any questions concerning this amendment request package or should additional information be required, please call L.J. Rudy at (803) 831-3084.

Very truly yours,



W.R. McCollum

LJR/s

Attachments

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xc (with attachments):

S.D. Ebnetter, Regional Administrator
Region II

R.J. Freudenberger, Senior Resident Inspector

R.E. Martin, Senior Project Manager
ONRR

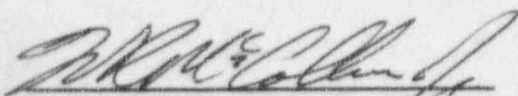
Max Batavia, Chief
Bureau of Radiological Health, SC

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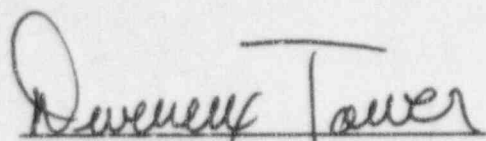
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W.R. McCollum, being duly sworn, states that he is Vice President of Duke Power Company; that he is authorized on the part of said Company to sign and file with the Nuclear Regulatory Commission these revisions to the Catawba Nuclear Station License Nos. NPF-35 and NPF-52; and that all statements and matters set forth therein are true and correct to the best of his knowledge.


W.R. McCollum, Vice President

Subscribed and sworn to before me this 17th day of August, 1995.


Notary Public

My commission expires:

JANUARY 23, 2005

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bxc (with attachments):

A.V. Carr

Z.L. Taylor

L.J. Rudy

S.W. Brown

A.S. Bhatnagar

S.L. Bradshaw

M.J. Brady

W.E. Green

M.D. Furtick

B.G. Addis

NCMPA-1

NCEMC

PMPA

SREC

Document Control File CN-801.01

Group File CN-801.01

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ATTACHMENT 1

BACKGROUND AND DESCRIPTION OF AMENDMENT REQUESTS

Background and Description of Amendment Requests

Amendment Nos. 128 and 122 for Units 1 and 2, respectively, approved by the NRC on February 17, 1995, revised TS Table 2.2-1 and TS 4.2.5 to allow a change in the method for measuring RCS flowrate from the calorimetric heat balance method to a method based on a one-time calibration of the RCS cold leg elbow differential pressure taps. (Amendments 116 and 110 for Units 1 and 2, respectively, approved this methodology for Unit 1 Cycle 8 operation only.)

In Catawba's original January 10, 1994 application, as amended, Catawba failed to modify SR 4.2.5.2 to delete that portion of the SR which specifies that the measurement instrumentation shall be calibrated within 7 days prior to the performance of the flowrate measurement. The requirement to calibrate the measurement instrumentation within 7 days prior to the performance of the flowrate measurement is impractical based on utilization of the cold leg elbow pressure tap method of RCS flowrate measurement. Accordingly, SR 4.2.5.2 is hereby modified to reflect the deletion of the subject requirement. No change to the corresponding Bases section of the TS is required.

ATTACHMENT 2

JUSTIFICATION AND SAFETY EVALUATION

Justification and Safety Evaluation

Prior to the issuance of Amendment Nos. 128/122 (and Amendment Nos. 116/110 for Unit 1 Cycle 8 operation), Catawba performed the 18-month RCS flowrate determination of TS 4.2.5 by utilizing a precision heat balance method of measurement. The TS therefore required that the measurement instrumentation be calibrated within 7 days prior to the performance of the flowrate measurement. The only instrumentation that was subject to this requirement was the data logger used to log RCS temperature values. All other parameters used in the determination of RCS flowrate via the precision heat balance method were obtained from the Operator Aid Computer (OAC).

With the issuance of Amendment Nos. 128/122 (and Amendment Nos. 116/110 for Unit 1 Cycle 8 operation), all data taken in support of the flowrate measurement using the cold leg elbow tap method is now obtained from the OAC. The special test instrumentation used previously, and subject to the 7-day requirement, is no longer used. The statement in SR 4.2.5.2 was never intended to apply to the RCS loop flowrate transmitters themselves, as they are calibrated only during refueling outages as required by SR 4.3.1.1. It is not desirable to calibrate the flowrate transmitters while the unit is operating due to the potential that exists for a unit trip. Each transmitter on a RCS loop shares an impulse line with the other two transmitters on that loop; hence, if the transmitters were calibrated while the unit were operating, the potential would exist to isolate all three transmitters on a RCS loop simultaneously (isolation of any two transmitters on a loop would result in a unit trip). It is therefore concluded that the statement in SR 4.2.5.2 concerning calibrating the measurement instrumentation within 7 days prior to the performance of the flowrate measurement was never intended to apply to the RCS loop flowrate transmitters. This TS change is consequently considered an administrative change which should have been made when the January 10, 1994 amendment application pertaining to Amendment Nos. 128/122 (and 116/110) was made.

Based on the above technical justification, Duke Power Company concludes that it is acceptable to delete the requirement pertaining to calibration of the subject measurement instrumentation.

ATTACHMENT 3

**NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION
AND ENVIRONMENTAL IMPACT ANALYSIS**

No Significant Hazards Consideration Determination

As required by 10CFR50.91, this analysis is provided concerning whether the requested amendments involve significant hazards considerations, as defined by 10CFR50.92. Standards for determination that an amendment request involves no significant hazards considerations are if operation of the facility in accordance with the requested amendment would not: 1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or 2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or 3) Involve a significant reduction in a margin of safety.

Criterion 1

The requested amendments will not involve a significant increase in the probability or consequences of an accident previously evaluated. This change is considered administrative in nature and should have been requested in Duke Power Company's January 10, 1994 application, as amended. The instrumentation which was subject to the requirement is no longer utilized in the fulfillment of the TS required RCS flowrate determination. The proposed changes will not result in any impact upon accident probabilities, since the RCS flowrate measurement instrumentation is not accident initiating equipment. Likewise, they will not result in any impact upon accident consequences, since no change to any method or frequency of calibration of the RCS flowrate transmitters will result. The plant response to accidents will not be affected.

Criterion 2

The requested amendments will not create the possibility of a new or different kind of accident from any accident previously evaluated. No change is being made to any plant design feature, or to the manner in which the plant will be operated. Therefore, no new accident causal mechanisms can be generated. As noted above, the proposed changes are considered administrative in nature, and should have been requested in the January 10, 1994 application, as amended.

Criterion 3

The requested amendments will not involve a significant reduction in a margin of safety. No impact upon any fission product barriers will occur as a result of the approval of the proposed changes. No change to plant design, operating, maintenance, or test characteristics will result from the proposed amendments. No impact upon any plant safety margins will result.

Environmental Impact Analysis

The proposed amendments have been reviewed against the criteria of 10CFR51.22 for environmental considerations. The proposed amendments do not involve a significant hazards consideration, nor increase the types and amounts of effluents that may be released offsite, nor increase individual or cumulative occupational radiation exposures. Therefore, the proposed amendments meet the criteria given in 10CFR51.22(c)(9) for a categorical exclusion from the requirement for an Environmental Impact Statement.