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DUKE POWER

February 6, 1992

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
Generic Letter 90-06 (PORV and Block Valve Reliability and LTOP)
Additional Proposed Technical Specifications Changes

References: 1) Letter from M.S. Tuckman to NRC dated May 9, 1991
2) Letter from NRC to M.S. Tuckman dated December 18, 1991

Gentlemen:

In Reference 1, Duke Power Company submitted revised technical specifications for the PORVs and block valves and LTOP systems in accordance with the guidance contained in Generic Letter 90-06. In general, Duke Power Company closely followed the generic letter's guidance; where departure from the guidance existed, technical justification was provided.

One of the technical specification changes in Reference 1 was a modification to Surveillance Requirement 4.4.4.1b. governing stroking of PORVs. The generic letter recommended conducting this stroke test in Mode 3 or 4 in order to simulate environmental conditions encountered by the PORVs during power operation. Since Catawba already strokes the PORVs during Mode 4, it was felt unnecessary to include the mode requirement in technical specifications. It was also noted that since the corresponding Limiting Condition for Operation only applies to Modes 1-3, it was not necessary to further amend the surveillance requirement. During subsequent telephone conversations between Duke Power Company and the NRC, we indicated that we would evaluate incorporating the Mode 4 stipulation in SR 4.4.4.1b. in light of the fact that there are other places in the technical specifications where SRs must be performed in modes other than those governing the LCO. Please find attached a revised markup to SR 4.4.4.1b. where a footnote has been incorporated to stipulate that this surveillance must be performed at Reactor Coolant System temperatures above 200 F in order to simulate environmental conditions encountered by the PORVs during operation. The footnote states that this surveillance shall not be performed in Modes 1 or 2 in order to avoid

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the potential for a LOCA while the unit is operating. It was desired to address the NRC concern by making reference to Reactor Coolant System temperature rather than mode in order to avoid potentially confusing situations regarding PORV operability at some future date (i.e., one could mistakenly conclude that LCO 3.4.4 applies to Mode 4 if the Mode 4 stipulation were included in SR 4.4.4.1b.).

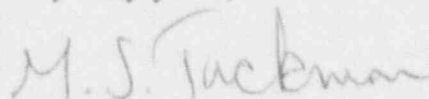
A second change in Reference 1 expanded the Bases section for PORVs, block valves, and LTOP systems to identify the major functions of this equipment and clarify operability requirements. The generic letter indicated that one of the bases for PORV operability was determined on their being capable of automatic control to control RCS pressure for overpressurization events. Duke Power Company expressed a concern that during the conduct of certain tests, the PORV and/or block valve can be closed for brief periods of time, thereby defeating its auto-actuation capability, and also that the PORV could be isolated for longer periods of time to control seat leakage. Our concern was that this would impact the operability of the PORVs. Reference 2 suggests that this concern could be alleviated by insertion of a qualifier into the Bases section which would allow continued PORV operability with the PORV and/or block valve closed for testing or with the PORV isolated to control seat leakage. Please also find attached a revised markup of the Bases section to reflect the resolution to this concern. This revised markup is consistent with a technical specification interpretation currently in place at Catawba governing PORV and block valve operability with the PORV and/or block valve closed for testing.

Finally, an additional change was made to SR 4.4.4.3 to reflect the fact that Catawba's PORVs are backed by a safety-related nitrogen source. The proposed change better reflects existing design features.

The safety analysis and No Significant Hazards Consideration Analysis provided in Reference 1 remain unchanged as a result of these additional technical specification changes.

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

Very truly yours,



M.S. Tuckman

LJR/s

Attachment

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xc (W/Attachment):

S.D. Ebnetter

Regional Administrator, Region II

R.E. Martin, ONRR

W.T. Orders

Senior Resident Inspector

Heyward Shealy, Chief

Bureau of Radiological Health, SC

American Nuclear Insurers

M&M Nuclear Consultants

INPO Records Center

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M.S. Tuckman, 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 this revision 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.

M. S. Tuckman

M.S. Tuckman, Vice President

Subscribed and sworn to before me this 6th day of February, 1992.

Gordon H. Jackson
Notary Public

My commission expires:

Nov. 21, 2000