

ATTACHMENT 1.A

**MARKED-UP PROPOSED TECHNICAL SPECIFICATIONS PAGES FOR
CURRENT TECHNICAL SPECIFICATIONS
CATAWBA NUCLEAR STATION**

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TABLE 3.6-1 (Continued)

SECONDARY CONTAINMENT BYPASS LEAKAGE PATHS

<u>PENETRATION NUMBER</u>	<u>SERVICE</u>	<u>RELEASE LOCATION</u>	<u>TEST TYPE</u>
M323	Component Cooling to Component Cooling Drain Sump	Auxiliary Building	Type C
M240	Nuclear Service Water to Reactor Coolant Pump and Lower Cont. Vent. Units	Auxiliary Building	Type C
M230	Nuclear Service Water From Reactor Coolant Pump and Lower Cont. Vent. Units	Auxiliary Building	Type C
M385	Nuclear Service Water to Upper Containment Ventilation Units In	Turbine Building	Type C
M308 #	Nuclear Service Water to Upper Containment Ventilation Units Out	Turbine Building	Type C
M213	Incore Instrumentation Room Purge In	Auxiliary Building	Type C
M140	Incore Instrumentation Room Purge Out	Auxiliary Building	Type C
M456	Upper Compartment Purge Inlet	Auxiliary Building	Type C
M432	Upper Compartment Purge Inlet	Auxiliary Building	Type C
M357	Lower Compartment Purge Inlet	Auxiliary Building	Type C
M368	Containment Purge Exhaust	Auxiliary Building	Type C
M433	Containment Purge Exhaust	Auxiliary Building	Type C
M434	Lower Compartment Purge Inlet	Auxiliary Building	Type C

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TABLE 3.6-1 (Continued)

SECONDARY CONTAINMENT BYPASS LEAKAGE PATHS

<u>PENETRATION NUMBER</u>	<u>SERVICE</u>	<u>RELEASE LOCATION</u>	<u>TEST TYPE</u>
M386	Containment Air Release	Auxiliary Building	Type C
M204	Containment Air Addition	Auxiliary Building	Type C
M316	Int. Fire Protection Header - Hose Racks	Auxiliary Building	Type C
M337	Demineralized Water	Auxiliary Building	Type C
M220	Instrument Air	Auxiliary Building	Type C
M219	Station Air	Auxiliary Building	Type C
M215	Breathing Air	Auxiliary Building	Type C
M329	Reactor Coolant Pump Motor Oil Fill	Auxiliary Building	Type C
M361	Int. Fire Protection Header - Sprinklers	Auxiliary Building	Type C
M119	Containment Purge Exhaust	Auxiliary Building	Type C
M331	Nitrogen Supply to Cold Leg Accumulators	Auxiliary Building	Type C
M322	Safety Injection Test Line	Auxiliary Building	Type C
M454	UHI Test Line	Auxiliary Building	Type C } Note 1
M328*	Component Cooling to Reactor Vessel Support and RCP Coolers	Auxiliary Building	Type C

*Not applicable for Unit 1 until after the first refueling outage.

Note 1: Upon capping of penetrations associated with deletion of UHI, this specification is no longer applicable.

Not applicable for Unit 1 AFTER REFUELING OUTAGE 1EOC9, Not applicable for Unit 2 AFTER REFUELING OUTAGE 2EOC9

CATAWBA - UNITS 1 & 2

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Amendment No. 32 (Unit 1)
Amendment No. 23 (Unit 2)

TABLE 3.6-2a (Continued)

CONTAINMENT ISOLATION VALVES

<u>VALVE NUMBER</u>	<u>FUNCTION</u>	<u>MAXIMUM ISOLATION TIME (s)</u>
2. Phase "B" Isolation (Continued)		
RN-437B	Supply to NC Pumps and LCVU Supply Outside Containment Isolation	≤60
RN-484A	Return from NC Pumps and LCVU Return Inside Containment Isolation	≤60
RN-487A	Return from NC Pumps and LCVU Return Outside Containment Isolation	≤60
RN-404B	Supply to Upper Containment Supply Ventilation Units Containment Isolation (Outside)	≤10
RN-429B ##	Return from Upper Containment Ventilation Units Containment Isolation (Inside)	≤10
RN-432B ##	Return from Upper Containment Ventilation Units Containment Isolation (Outside)	≤10
VI-77B	Instrument Air Containment Outside Isolation	≤10
SM-1 #	Main Steam 1D Isolation	NA
SM-3 #	Main Steam 1C Isolation	NA
SM-5 #	Main Steam 1B Isolation	NA
SM-7 #	Main Steam 1A Isolation	NA
SM-9 #	Main Steam 1D Isolation Bypass Ctrl.	NA
SM-10 #	Main Steam 1C Isolation Bypass Ctrl.	NA
SM-11 #	Main Steam 1B Isolation Bypass Ctrl.	NA
SM-12 #	Main Steam 1A Isolation Bypass Ctrl.	NA
SV-19 #	Main Steam 1A PORV	≤5
SV-13 #	Main Steam 1B PORV	≤5
SV-7 #	Main Steam 1C PORV	≤5
SV-1 #	Main Steam 1D PORV	≤5
WL-867A**	Containment Vent Unit Drains Inside Containment Isolation	≤10
WL-869B**	Containment Vent Unit Drains Outside Containment Isolation	≤10

CATAWBA - UNITS 1 & 2

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Amendment No. 107 (Unit 1)
Amendment No. 101 (Unit 2)

TABLE 3.6-2a (Continued)
UNIT 1 CONTAINMENT ISOLATION VALVES

<u>VALVE NUMBER</u>	<u>FUNCTION</u>	<u>MAXIMUM ISOLATION TIME (s)</u>
3. Manual (Continued)		
SM-103#	Main Steam IC	N.A.
SM-119#	Main Steam IC	N.A.
SM-141#	Main Steam IC	N.A.
SA-4#	Main Steam IC	N.A.
SM-19#	Main Steam ID	N.A.
SM-70#*	Main Steam ID	N.A.
SM-102#	Main Steam ID	N.A.
SM-118#	Main Steam ID	N.A.
SM-140#	Main Steam ID	N.A.
WE-20*	Cont Bldg Supply Isol	N.A.
WE-22*	Cont Bldg Supply Isol	N.A.
WE-56*	Cont Bldg Supply Isol	N.A.
FW-4*	Refueling Water	N.A.
NV-862#*	Pressurizer Auxiliary Spray ND Outside Containment	N.A.
WLA-21#*	Steam Generator Drain Pump Discharge Outside Containment Isolation	N.A.
WLA-24#*	Steam Generator Drain Pump Discharge Outside Containment Isolation	N.A.

TABLE NOTATIONS

* May be opened on an intermittent basis under administrative control.

** Valve also receives a High Radiation (H) and/or a High Relative Humidity isolation signal.

Not subject to Type C leakage tests.

NOTE: Times are for valve operation only, and do not include any sensor response or circuit delay times.
See Specification 3/4 3.2 for system actuation response times.

Not applicable to Unit 1 AFTER REFUELING OUTAGE 1EOC9.

TABLE 3.6-2b (Continued)

UNIT 2 CONTAINMENT ISOLATION VALVES

<u>VALVE NUMBER</u>	<u>FUNCTION</u>	<u>MAXIMUM ISOLATION TIME (s)</u>
2. Phase "B" Isolation (Continued)		
RN-437B	Supply to NC Pumps and LCVU Supply Outside Containment Isolation	≤60
RN-484A	Return from NC Pumps and LCVU Return Inside Containment Isolation	≤60
RN-487A	Return from NC Pumps and LCVU Return Outside Containment Isolation	≤60
RN-404B	Supply to Upper Containment Supply Ventilation Units Containment Isolation (Outside)	≤10
RN-429B # #	Return from Upper Containment Ventilation Units Containment Isolation (Inside)	≤10
RN-432B # #	Return from Upper Containment Ventilation Units Containment Isolation (Outside)	≤10
VI-77B	Instrument Air Containment Outside Isolation	≤10
SM-1 #	Main Steam 2D Isolation	NA
SM-3 #	Main Steam 2C Isolation	NA
SM-5 #	Main Steam 2B Isolation	NA
SM-7 #	Main Steam 2A Isolation	NA
SM-9 #	Main Steam 2D Isolation Bypass Ctrl.	NA
SM-10 #	Main Steam 2C Isolation Bypass Ctrl.	NA
SM-11 #	Main Steam 2B Isolation Bypass Ctrl.	NA
SM-12 #	Main Steam 2A Isolation Bypass Ctrl.	NA
SV-19 #	Main Steam 2A PORV	≤5
SV-13 #	Main Steam 2B PORV	≤5
SV-7 #	Main Steam 2C PORV	≤5
SV-1 #	Main Steam 2D PORV	≤5
WL-867A**	Containment Vent Unit Drains Inside Containment Isolation	≤10
WL-869B**	Containment Vent Unit Drains Outside Containment Isolation	≤10

CATAMBA - UNITS 1 & 2

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Amendment No.107 (Unit 1)
Amendment No.101 (Unit 2)

TABLE 3.6-2b (Continued)
UNIT 2 CONTAINMENT ISOLATION VALVES

<u>VALVE NUMBER</u>	<u>FUNCTION</u>	<u>MAXIMUM ISOLATION TIME (s)</u>
3. Manual (Continued)		
SM-103#	Main Steam 2C	N.A.
SM-119#	Main Steam 2C	N.A.
SM-141#	Main Steam 2C	N.A.
SA-4#	Main Steam 2C	N.A.
SM-19#	Main Steam 2D	N.A.
SM-70#*	Main Steam 2D	N.A.
SM-102#	Main Steam 2D	N.A.
SM-118#	Main Steam 2D	N.A.
SM-140#	Main Steam 2D	N.A.
WE-20*	Cont Bldg Supply Isol	N.A.
WE-22*	Cont Bldg Supply Isol	N.A.
WE-56*	Cont Bldg Supply Isol	N.A.
FW-4*	Refueling Water	N.A.
NV-862#*	Pressurizer Auxiliary Spray ND Outside Containment	N.A.
WLA-21#*	Steam Generator Drain Pump Discharge Outside Containment Isolation	N.A.
WLA-24#*	Steam Generator Drain Pump Discharge Outside Containment Isolation	N.A.

TABLE NOTATIONS

* May be opened on an intermittent basis under administrative control.

** Valve also receives a High Radiation (H) and/or a High Relative Humidity isolation signal.

Not subject to Type C leakage tests.

NOTE: Times are for valve operation only, and do not include any sensor response or circuit delay times.
See Specification 3/4 3.2 for system actuation response times.

Not applicable to Unit 2 AFTER REFUELING OUTAGE 2EOC8.

ATTACHMENT 1.B

**PROPOSED TECHNICAL SPECIFICATIONS PAGES FOR PLANNED
DIVIDED TECHNICAL SPECIFICATIONS
CATAWBA NUCLEAR STATION**

**PROPOSED TECHNICAL SPECIFICATIONS PAGES FOR
DIVIDED TECHNICAL SPECIFICATIONS
CATAWBA NUCLEAR STATION
UNIT 1**

TABLE 3.6-1 (Continued)

SECONDARY CONTAINMENT BYPASS LEAKAGE PATHS

<u>PENETRATION NUMBER</u>	<u>SERVICE</u>	<u>RELEASE LOCATION</u>	<u>TEST TYPE</u>
M323	Component Cooling to Component Cooling Drain Sump	Auxiliary Building	Type C
M240	Nuclear Service Water to Reactor Coolant Pump and Lower Cont. Vent. Units	Auxiliary Building	Type C
M230	Nuclear Service Water From Reactor Coolant Pump and Lower Cont. Vent. Units	Auxiliary Building	Type C
M385	Nuclear Service Water to Upper Containment Ventilation Units In	Turbine Building	Type C
M308 #	Nuclear Service Water to Upper Containment Ventilation Units Out	Turbine Building	Type C
M213	Incore Instrumentation Room Purge In	Auxiliary Building	Type C
M140	Incore Instrumentation Room Purge Out	Auxiliary Building	Type C
M456	Upper Compartment Purge Inlet	Auxiliary Building	Type C
M432	Upper Compartment Purge Inlet	Auxiliary Building	Type C
M357	Lower Compartment Purge Inlet	Auxiliary Building	Type C
M368	Containment Purge Exhaust	Auxiliary Building	Type C
M433	Containment Purge Exhaust	Auxiliary Building	Type C
M434	Lower Compartment Purge Inlet	Auxiliary Building	Type C

TABLE 3.6-1 (Continued)
SECONDARY CONTAINMENT BYPASS LEAKAGE PATHS

<u>PENETRATION NUMBER</u>	<u>SERVICE</u>	<u>RELEASE LOCATION</u>	<u>TEST TYPE</u>
M386	Containment Air Release	Auxiliary Building	Type C
M204	Containment Air Addition	Auxiliary Building	Type C
M310	Int. Fire Protection Header - Hose Racks	Auxiliary Building	Type C
M337	Demineralized Water	Auxiliary Building	Type C
M220	Instrument Air	Auxiliary Building	Type C
M219	Station Air	Auxiliary Building	Type C
M215	Breathing Air	Auxiliary Building	Type C
M329	Reactor Coolant Pump Motor Oil Fill	Auxiliary Building	Type C
M361	Int. Fire Protection Header - Sprinklers	Auxiliary Building	Type C
M119	Containment Purge Exhaust	Auxiliary Building	Type C
M331	Nitrogen Supply to Cold Leg Accumulators	Auxiliary Building	Type C
M322	Safety Injection Test Line	Auxiliary Building	Type C
M328	Component Cooling to Reactor Vessel Support and RCP Coolers	Auxiliary Building	Type C

Not applicable after refueling outage 1EOC9

TABLE 3.6-2 (Continued)

CONTAINMENT ISOLATION VALVES

<u>VALVE NUMBER</u>	<u>FUNCTION</u>	<u>MAXIMUM ISOLATION TIME (s)</u>
2. Phase "B" Isolation (Continued)		
RN-437B	Supply to NC Pumps and LCVU Supply Outside Containment Isolation	≤ 60
RN-484A	Return from NC Pumps and LCVU Return Inside Containment Isolation	≤ 60
RN-487A	Return from NC Pumps and LCVU Return Outside Containment Isolation	≤ 60
RN-404B	Supply to Upper Containment Supply Ventilation Units Containment Isolation (Outside)	≤ 10
RN-429B ##	Return from Upper Containment Ventilation Units Containment Isolation (Inside)	≤ 10
RN-432B ##	Return from Upper Containment Ventilation Units Containment Isolation (Outside)	≤ 10
VI-77B	Instrument Air Containment Outside Isolation	≤ 10
SM-1 #	Main Steam 1D Isolation	NA
SM-3 #	Main Steam 1C Isolation	NA
SM-5 #	Main Steam 1B Isolation	NA
SM-7 #	Main Steam 1A Isolation	NA
SM-9 #	Main Steam 1D Isolation Bypass Ctrl.	NA
SM-10 #	Main Steam 1C Isolation Bypass Ctrl.	NA
SM-11 #	Main Steam 1B Isolation Bypass Ctrl.	NA
SM-12 #	Main Steam 1A Isolation Bypass Ctrl.	NA
SV-19 #	Main Steam 1A PORV	NA
SV-13 #	Main Steam 1B PORV	NA
SV-7 #	Main Steam 1C PORV	NA
SV-1 #	Main Steam 1D PORV	NA
WL-867A**	Containment Vent Unit Drains Inside Containment Isolation	≤ 10
WL-869B**	Containment Vent Unit Drains Outside Containment Isolation	≤ 10

TABLE 3.6-2 (Continued)
CONTAINMENT ISOLATION VALVES

<u>VALVE NUMBER</u>	<u>FUNCTION</u>	<u>MAXIMUM ISOLATION TIME (s)</u>
3. Manual (Continued)		
SM-103#	Main Steam 1C	NA
SM-119#	Main Steam 1C	NA
SM-141#	Main Steam 1C	NA
SA-4#	Main Steam 1C	NA
SM-19#	Main Steam 1D	NA
SM-70#*	Main Steam 1D	NA
SM-102#	Main Steam 1D	NA
SM-118#	Main Steam 1D	NA
SM-140#	Main Steam 1D	NA
WE-20*	Cont Bldg Supply Isol	NA
WE-22*	Cont Bldg Supply Isol	NA
WE-56*	Cont Bldg Supply Isol	NA
FW-4*	Refueling Water	NA
NV-862#*	Pressurizer Auxiliary Spray ND Outside Containment	NA
WLA-21#*	Steam Generator Drain Pump Discharge Outside Containment Isolation	NA
WLA-24#*	Steam Generator Drain Pump Discharge Outside Containment Isolation	NA

TABLE NOTATIONS

* May be opened on an intermittent basis under administrative control.

** Valve also receives a High Radiation (H) and/or a High Relative Humidity isolation signal.

Not subject to Type C leakage tests.

Not applicable after refueling outage 1EOC9.

NOTE: Times are for valve operation only, and do not include any sensor response or circuit delay times. See Specification 3/4 3.2 for system actuation response times.

**PROPOSED TECHNICAL SPECIFICATIONS PAGES FOR
DIVIDED TECHNICAL SPECIFICATIONS
CATAWBA NUCLEAR STATION
UNIT 2**

TABLE 3.6-1 (Continued)

SECONDARY CONTAINMENT BYPASS LEAKAGE PATHS

<u>PENETRATION NUMBER</u>	<u>SERVICE</u>	<u>RELEASE LOCATION</u>	<u>TEST TYPE</u>
M323	Component Cooling to Component Cooling Drain Sump	Auxiliary Building	Type C
M240	Nuclear Service Water to Reactor Coolant Pump and Lower Cont. Vent. Units	Auxiliary Building	Type C
M230	Nuclear Service Water From Reactor Coolant Pump and Lower Cont. Vent. Units	Auxiliary Building	Type C
M385	Nuclear Service Water to Upper Containment Ventilation Units In	Turbine Building	Type C
M308 #	Nuclear Service Water to Upper Containment Ventilation Units Out	Turbine Building	Type C
M213	Incore Instrumentation Room Purge In	Auxiliary Building	Type C
M140	Incore Instrumentation Room Purge Out	Auxiliary Building	Type C
M456	Upper Compartment Purge Inlet	Auxiliary Building	Type C
M432	Upper Compartment Purge Inlet	Auxiliary Building	Type C
M357	Lower Compartment Purge Inlet	Auxiliary Building	Type C
M368	Containment Purge Exhaust	Auxiliary Building	Type C
M433	Containment Purge Exhaust	Auxiliary Building	Type C
M434	Lower Compartment Purge Inlet	Auxiliary Building	Type C

TABLE 3.6-1 (Continued)
SECONDARY CONTAINMENT BYPASS LEAKAGE PATHS

<u>PENETRATION NUMBER</u>	<u>SERVICE</u>	<u>RELEASE LOCATION</u>	<u>TEST TYPE</u>
M386	Containment Air Release	Auxiliary Building	Type C
M204	Containment Air Addition	Auxiliary Building	Type C
M316	Int. Fire Protection Header - Hose Racks	Auxiliary Building	Type C
M337	Demineralized Water	Auxiliary Building	Type C
M220	Instrument Air	Auxiliary Building	Type C
M219	Station Air	Auxiliary Building	Type C
M215	Breathing Air	Auxiliary Building	Type C
M329	Reactor Coolant Pump Motor Oil Fill	Auxiliary Building	Type C
M361	Int. Fire Protection Header - Sprinklers	Auxiliary Building	Type C
M119	Containment Purge Exhaust	Auxiliary Building	Type C
M331	Nitrogen Supply to Cold Leg Accumulators	Auxiliary Building	Type C
M322	Safety Injection Test Line	Auxiliary Building	Type C
M328	Component Cooling to Reactor Vessel Support and RCP Coolers	Auxiliary Building	Type C

Not applicable after refueling outage 2EOC8.

TABLE 3.6-2 (Continued)

CONTAINMENT ISOLATION VALVES

<u>VALVE NUMBER</u>	<u>FUNCTION</u>	<u>MAXIMUM ISOLATION TIME (s)</u>
2. Phase "B" Isolation (Continued)		
RN-437B	Supply to NC Pumps and LCVU Supply Outside Containment Isolation	≤ 60
RN-484A	Return from NC Pumps and LCVU Return Inside Containment Isolation	≤ 60
RN-487A	Return from NC Pumps and LCVU Return Outside Containment Isolation	≤ 60
RN-404B	Supply to Upper Containment Supply Ventilation Units Containment Isolation (Outside)	≤ 10
RN-429B ##	Return from Upper Containment Ventilation Units Containment Isolation (Inside)	≤ 10
RN-432B ##	Return from Upper Containment Ventilation Units Containment Isolation (Outside)	≤ 10
VI-77B	Instrument Air Containment Outside Isolation	≤ 10
SM-1 #	Main Steam 2D Isolation	NA
SM-3 #	Main Steam 2C Isolation	NA
SM-5 #	Main Steam 2B Isolation	NA
SM-7 #	Main Steam 2A Isolation	NA
SM-9 #	Main Steam 2D Isolation Bypass Ctrl.	NA
SM-10 #	Main Steam 2C Isolation Bypass Ctrl.	NA
SM-11 #	Main Steam 2B Isolation Bypass Ctrl.	NA
SM-12 #	Main Steam 2A Isolation Bypass Ctrl.	NA
SV-19 #	Main Steam 2A PORV	NA
SV-13 #	Main Steam 2B PORV	NA
SV-7 #	Main Steam 2C PORV	NA
SV-1 #	Main Steam 2D PORV	NA
WL-867A**	Containment Vent Unit Drains Inside Containment Isolation	≤ 10
WL-869B**	Containment Vent Unit Drains Outside Containment Isolation	≤ 10

TABLE 3.6-2 (Continued)

CONTAINMENT ISOLATION VALVES

<u>VALVE NUMBER</u>	<u>FUNCTION</u>	<u>MAXIMUM ISOLATION TIME (s)</u>
3. Manual (Continued)		
SM-103#	Main Steam 2C	N.A.
SM-119#	Main Steam 2C	N.A.
SM-141#	Main Steam 2C	N.A.
SA-4#	Main Steam 2C	N.A.
SM-19#	Main Steam 2D	N.A.
SM-70#*	Main Steam 2D	N.A.
SM-102#	Main Steam 2D	N.A.
SM-118#	Main Steam 2D	N.A.
SM-140#	Main Steam 2D	N.A.
WE-20*	Cont Bldg Supply Isol	N.A.
WE-22*	Cont Bldg Supply Isol	N.A.
WE-56*	Cont Bldg Supply Isol	N.A.
FW-4*	Refueling Water	N.A.
NV-862#*	Pressurizer Auxiliary Spray ND Outside Containment	N.A.
WLA-21#*	Steam Generator Drain Pump Discharge Outside Containment Isolation	N.A.
WLA-24#*	Steam Generator Drain Pump Discharge Outside Containment Isolation	N.A.

TABLE NOTATIONS

* May be opened on an intermittent basis under administrative control.

** Valve also receives a High Radiation (H) and/or a High Relative Humidity isolation signal.

Not subject to Type C leakage tests.

Not applicable after refueling outage 2EOC8.

NOTE: Times are for valve operation only, and do not include any sensor response or circuit delay times. See Specification 3/4 3.2 for system actuation response times.

ATTACHMENT 2

BACKGROUND AND DESCRIPTION OF REQUEST

BACKGROUND

Both units' containment process penetration M308 piping and associated containment isolation valves are currently not in service. Modifications were incorporated on both units' normal cooling supply to the Upper Containment Ventilation Units (UCVUs) which changed the ventilation units' cooling water from raw water (Nuclear Service Water System - RN) to chilled water (Containment Cooling Water System - YV). This modification was completed on Unit 1 during refueling outage 1EOC7 in 1994 and completed on Unit 2 during refueling outage 2EOC6 in 1994.

These modifications tied the UCVU return header to the Lower Containment Ventilation Units (LCVUs) return header inside of containment. The UCVU return header no longer serves a useful purpose. Following the modifications, containment isolation valves RN-429A and RN-432B were tagged closed with power removed to eliminate the potential for failure during a containment isolation event. Accordingly, these valves' inoperability for stroke-time testing are tracked in the Technical Specification Action Item Log (TSAIL) and are no longer stroke-time tested since they are already positioned to their fail-safe position. However, both Unit 1 and Unit 2 valve RN-429A are still included in the Containment Seal Injection Water System (NW) Leak Test program since they are serviced by the NW System for containment leakage. The NW valve servicing Unit 2 valve RN-432B recently failed it's NW leak test and was unable to be repaired. Further modifications were performed so that the piping from Unit 2 valve RN-432B, to where the RN pipe was cut and capped outside of containment, was upgraded to Class B piping and the penetration was changed from an NW leak test penetration to a Type C leak test penetration. These containment isolation valves and equipment associated with process penetration M308 represent an unnecessary challenge to containment isolation, NW System leak-rate testing and the condition of control room instrumentation relative to the requirements of NUREGs 0700 and 0737.

Duke Power Company plans to implement modifications for both units to remove containment isolation valves RN-429A and RN-432B of penetration M308, remove associated wiring and control room instrumentation, cut / cap tubing providing Containment Valve Injection Water to these containment isolation valves during Unit 1 refueling outage 1EOC9 (currently scheduled to begin in June, 1996) and Unit 2 refueling outage 2EOC8 (currently scheduled to begin in March, 1997). This planned modification also deletes all but a small portion of process penetration M308 piping such that the remaining section of piping is capped on each end, both inside and outside of containment, with removable flanges for temporary use during refueling outages to support containment cooling. A test connection will be provided for the required post-modification test, periodic Type B leak-rate tests, and subsequent 'as-needed' retests following use of the penetration. The reliability of containment isolation and integrity will be improved by this planned modification. Please refer to Attachment 5 (Modified Process Penetration M308) for a detailed sketch of the planned modification to penetration M308.

DESCRIPTION OF AMENDMENT REQUEST

This Technical Specification amendment request addresses the containment integrity function of process penetration M308 relative to secondary containment bypass leakage paths and containment isolation. This proposed Technical Specifications change removes process penetration M308 and containment isolation valves RN-429A and RN-432B from Technical Specifications since planned modifications to modify penetration configuration, which includes removal of associated containment isolation valves, effectively relegates the penetration to a spare penetration with provisions for temporary use only during refueling outages. Appropriate post-modification Type B leak-rate testing, subsequent Type B periodic leak-rate testing and retesting following use, will be performed

ATTACHMENT 3

**CHANGES TO TECHNICAL SPECIFICATIONS
AND TECHNICAL JUSTIFICATION**

CHANGES TO TECHNICAL SPECIFICATIONS

The requested amendment adds a footnote to Technical Specifications Table 3.6-1 (Secondary Containment Bypass Leakage Paths) for process penetration M308 (Return from Upper Containment Ventilation Units) to state that penetration M308 no longer applies to Unit 1 following refueling outage 1EOC9 (currently scheduled to begin in June, 1996) and no longer applies to Unit 2 following refueling outage 2EOC8 (currently scheduled to begin in March, 1997). The proposed amendment also deletes the associated containment isolation valves RN-429A (Return from Upper Containment Ventilation Units Containment Isolation Valve - Inside) and RN-432B (Return from Upper Containment Ventilation Units Containment Isolation Valve - Outside) from Table 3.6-2a (Unit 1 Containment Isolation Valves) following refueling outage 1EOC9 and from Table 3.6-2b (Unit 2 Containment Isolation Valves) following refueling outage 2EOC8.

Catawba's Technical Specifications will soon be divided into two (2) volumes, the first volume specific only to Unit 1 and the second volume specific only to Unit 2. This is necessary due to the planned Unit 1 steam generator replacement in June, 1996. The Catawba divided Technical Specifications amendment was submitted to your staff July 18, 1994 and may be approved prior to NRC approval of this proposed Technical Specification amendment.

TECHNICAL JUSTIFICATION

The original basis for process penetration M308 was to provide a return for raw water containment cooling water from the upper containment ventilation units. Containment ventilation is necessary to maintain containment temperatures within the criteria specified by Technical Specifications. However, when the upper containment ventilation units were modified to be serviced by chilled water, the upper containment ventilation return header was tied into the lower containment ventilation unit return header inside of containment, effectively rendering process penetration M308 out of service. However, penetration M308 and its associated components continue to serve as a containment boundary with respect to containment integrity. Planned modifications during the upcoming Unit 1 refueling outage (1EOC9, currently scheduled to start in June, 1996) will remove containment isolation valves RN-429A and RN-432B from the process piping of penetration M308. These modifications will enhance the integrity of containment and reduce unnecessary challenges to containment isolation, NW System leak-rate testing, and the condition of control room instrumentation.

ATTACHMENT 4

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

NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

As required by 10 CFR 50.91, this analysis is provided concerning whether the requested Technical Specification amendments involve significant hazards considerations, as defined by 10 CFR 50.92. The standard for determining that a Technical Specification amendment request involves no significant hazards considerations requires that operation of the facility in accordance with the requested amendment will 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 the margin of safety.

This requested amendment removes process penetration M308 from Technical Specifications Table 3.6-1 and removes containment isolation valves RN-429A and RN-432B from Technical Specifications Table 3.6-2a and Table 3.6-2b due to planned modifications which physically remove these valves from process penetration M308.

CRITERION 1

The physical removal of containment isolation valves RN-432B and RN-429A, associated control room instrumentation, containment valve injection water connections to these valves and the subsequent sealing of process penetration M308 will decrease unnecessary challenges to containment isolation, containment valve injection water leak-rate testing and the condition of control room instrumentation, as opposed to the current configuration.

Since the sealing of process penetration M308 will be performed per the requirements of the applicable ASME code piping safety class requirements, the confidence in the pressure boundary will be equivalent to the component as originally designed. Therefore, this Technical Specification amendment to remove process penetration M308 from Technical Specification Tables 3.6-1 and to remove containment isolation valves RN-429A and 432B from Technical Specification Table 3.6-2a and Table 3.6-2b will not increase the probability or consequences of an accident that has been previously evaluated.

CRITERION 2

Since no new failure modes are created, on the basis that the penetration is equivalent in confidence to the original design, and the plant will operate the same way it does now, this Technical Specification amendment to remove process penetration M308 from Technical Specification Tables 3.6-1 and to remove containment isolation valves RN-429A and 432B from Technical Specification Table 3.6-2a and Table 3.6-2b does not create the possibility of a new or different kind of accident from any accident previously evaluated.

CRITERION 3

This proposed change to Technical Specifications will not cause a significant reduction in the margin of safety. Upon completion of the removal of containment isolation valves RN-432B and 429A and the subsequent sealing of process penetration M308, the penetration will be Type B leak rate tested as part of post-modification testing, and will be retested periodically and following each use of the penetration for temporary containment cooling purposes during refueling outages. Therefore, the fuel, cladding, reactor coolant pressure boundary, and containment are not negatively affected by the proposed Technical Specification amendment. No assumptions made in any accident analysis are compromised by this proposed Technical Specification amendment.

ENVIRONMENTAL IMPACT ANALYSIS

The proposed Technical Specification amendment has been reviewed against the criteria of 10 CFR 51.22 for environmental considerations. As previously shown above, the proposed change does not involve significant hazards consideration nor increase the types and amounts of effluents that may be released offsite, nor increase individual or cumulative occupational radiation exposure. Based on this, the proposed amendment meets the criteria given in 10 CFR 51.22(C)(9) for categorical exclusion from the requirements for an Environmental Impact Statement.

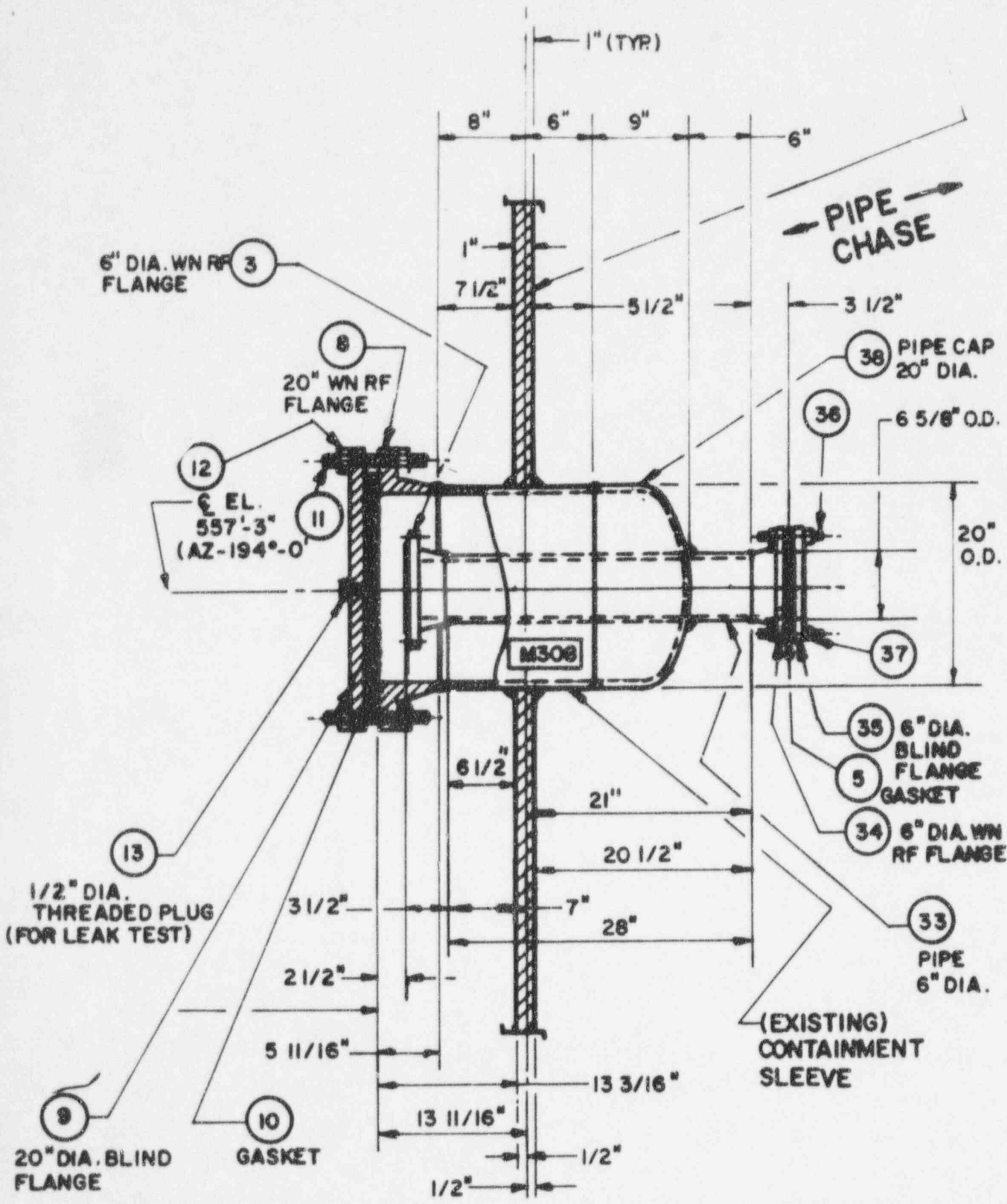
COMMITTEE REVIEWS

This proposed change to the Technical Specifications has been reviewed and approved by the Catawba Plant Operating Review Committee and the Nuclear Safety Review Board.

ATTACHMENT 5

PLANNED MODIFICATION TO PROCESS PENETRATION M308

CONTAINMENT VESSEL



ELEVATION VIEW- SEALED PENETRATION (M-308)

SCALE: 1" = 1'-0"