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DUKE POWER

June 8, 1992

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

Subject: Catawba Nuclear Station
Docket Nos. 50-413 and 50-414
Supplement to TS Amendment Request
Technical Specification (TS) 3.6.5.5 (PZR Hatch)

On April 13, 1992 Catawba Nuclear Station submitted a proposed revision to TS 3.6.5.5 which would allow the pressurizer enclosure hatch to be open for a period of time up to 6 hours. Per conversation with your staff on June 3, 1992 additional information regarding the scope of work and specific work activities is being provided.

The intent of this requested amendment is to allow planned work activities to occur inside the pressurizer enclosure, without the need for a waiver of compliance from TS 3.6.5.5. The scope of work activities inside the pressurizer enclosure during Modes 1-4 will not be increased.

Planned entries into the pressurizer enclosure include:

1. Upon entering Mode 3 at the beginning of every refueling outage an inspection of the packing leakoff lines on the Reactor Coolant PORV's and the PORV Block Valves is performed. While in the cavity, a general visual inspection for any type of leak or other problem is performed. This inspection must be performed in Mode 3 because it may not be possible to detect leakage as the Unit is cooled down and depressurized. This practice began because several start ups were delayed due to this type of leakage.
2. An inspection similar to the one described above is performed during Mode 3 following every refueling outage. The PORV's and PORV Block Valves are inspected for packing leakage. This is done to ensure the valves are in good condition for the cycle. Also, since the PORV Block Valves have a pressure seal used for the body to bonnet gasket (which can be affected by temperature changes), it is a good practice to perform a visual inspection of the valves and area.
3. If any valve work (seat, bonnet, packing, or removal) was performed during the refueling outage on the Reactor Coolant PORV's, Block Valves, or Safeties, a functional test for external leakage must be performed at full temperature and

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pressure. During every refueling outage, it is Catawba's practice to remove at least one Pressurizer Safety to meet the Overpressure Protection TS while in Low Pressure Mode. This means that the associated inlet and outlet flanges must have a functional inspection performed while in Mode 3. This inspection is performed during the inspection described in 2 above.

Operations surveillance, "Inside Containment Boric Acid Check" is performed upon entering Mode 3 at the start of a refueling outage, or after a trip following a long run. Operations inspects all areas of Containment, including the upper pressurizer cavity, for signs of boric acid corrosion from leaks. When performed at the start of a refueling outage, this surveillance is scheduled with inspection 2 above.

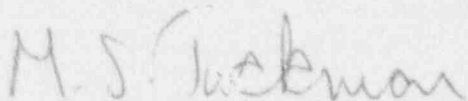
There are also several reasons why unplanned entries into the pressurizer enclosure would be made. These include:

1. Suspected instrument tubing leak affecting Pressurizer level indication.
2. Confirm Pressurizer Safety valve(s) leakage.
3. Confirm Pressurizer PORV seat leakage.
4. Investigate Pressurizer Safety Valve Relief line high temperature.

The Unit 2 PORV Block Valves are schedule to be tested and radiographed on June 23, 1992. The grace period for this surveillance ends on July 16, 1992, therefore approval of this TS is needed prior to this date to avoid the need for a waiver of compliance.

If there are any questions, please contact Mary Hazeltine at 803-831-3080.

Very truly yours,



M. S. Tuckman

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