Dube Power Company Catawba Naciear Generation Department 4890 Concord Road York, SC 29745



DUKE POWER

August 5, 1992

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

Subject: Catawba Nuclear Station, Unit 2 Docket No. 50-414 Supplement to Proposed Technical Specification Amendment Deletion of Shutdown Requirement for Conducting Service Test of 125-Volt DC Vital Instrumentation and Control Power System Batteries (TS 3/4.8.2 and Bases)

Reference: Proposed Technical Specification Amendment dated May 14, 1992, same subject.

Gentlemen:

On July 29, 1992, two conference calls were held with NRC personnel from both the Office of Nuclear Reactor Regulation and Region II to discuss the reference technical specification amendment. Specifically, the calls focused on one of the findings in the Catawba Electrical Distribution System Functional Inspection (EDSFI). This finding involved whether analysis supported the capability of two of the vital batteries for each unit at Catawba (small 825 ampere-hour batteries 1/2EBB and 1/2EBC) to adequately supply emergency loads while a single battery supplied two emergency DC buses in a cross-tied configuration. This issue had been raised by the NRC in conjunction with the reference proposed amendment. If a small battery were incapable of supplying required loads for two channels simultaneously, and therefore inoperable, two out of four vital batteries would be inoperable while the service test was being conducted on a large (1200 ampere-hour) battery. (This issue was not of concern while a small battery was out of service for testing because the capability of large batteries 1/2EBA and 1/2EBD of supplying two channels in a cross-tied configuration was never in question.)

During the conference calls, Duke Power Company personnel discussed several options that were being considered for resolving the issue of conducting the next required service test on battery 2EBD (the grace period for conducting this test expires on August 24, 1992). These

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options included demonstrating by analysis that a small battery is fully capable of supplying two load channels in a cross-tied configuration, extending the surveillance interval for conducting the service test of battery 2EBD until the next Unit 2 refueling outage, and supplying temporary DC power from a Unit 1 vital battery so the service test could be conducted on Unit 2. After examining all of the available options, Duke Power Company elected to pursue approval of the reference proposed amendment on a one-time basis for battery 2EBD to allow the service test to be conducted during power operation prior to the expiration of the grace period. In support of this option, Duke Power Company would adequately demonstrate that battery 2EBB is capable of supplying required loads for two channels in the cross-tied configuration while the service test is being conducted. It was indicated that because of time limitations between now and August 24, 1992, this analysis will not meet all final requirements pertaining to QA and documentation, although the techr' al issues will be fully addressed.

Accordingly, please find in Attachment 1 revised technical specification pages which will permit the service test of battery 2EBD to be conducted during power operation on a onetime basis prior to August 24, 1992. The appropriate justification and safety analysis is included as Attachment 2. A portion of the accompanying technical discussion is identical to that submitted previously; however, for completeness sake, it is being submitted again in its entirety. Attachment 3 contains a revised No Significant Hazards Consideration Analysis (the Environmental Impact Analysis is unchanged from that submitted in the reference proposed amendment).

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

Very truly yours,

M. J. Tucky

M.S. Tuckman

LJR/s

Attachments

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xc (W/Attachments): S.D. Ebneter, Regional Administrator Region II

W.T. Orders, Senior Resident Inspector

R.E. Martin ONRR

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 Dake 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 No. NPF-52 and that all statements and matters set forth therein are true and correct to the best of his knowledge.

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M.S. Tuckman, Vice President

Subscribed and sworn to before me this 5th day of August, 1992.

Williamo Wellas Notary Public

My commission expires:

Notary Public: South Carolina State at Large My Commission Expires Aug. 5, 1993