

Duke Power Company
Catawba Nuclear Generation Department
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DUKE POWER

September 17, 1992

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

Subject: Catawba Nuclear Station, Unit 1
Docket No. 50-413
Technical Specification Amendment Supplement
Steam Generator Repair Criteria

On August 24, 1992, Catawba Nuclear Station submitted a proposed Technical Specification amendment. This proposed amendment was supplemented on September 2 and 4, 1992. The proposed revisions change the Steam Generator repair criteria for Catawba Unit 1 Cycle 7 operation. This submittal provides additional information regarding the previous submittals requesting an Interim Plugging Criteria (IPC).

During the first quarter of 1993, additional data will be submitted to the NRC from analyses performed on three additional tubes pulled from Catawba Unit 1. These pulled tubes include six tube support plate intersections. Duke Power expects that the burst and leakage data from these three tubes will continue to support the use of the one volt interim plugging criteria. Discussions with the Staff will be held at that time to review the results of the burst and leakage testing. Catawba is planning on a resolution of this issue prior to May 1, 1993. If the NRC's concerns are not resolved by May 1, Catawba will perform a mid-cycle inspection of the Unit 1 steam generators at that time. The inspection would be scheduled to begin at this time to allow completion of the Unit 2 refueling outage. If at any time Catawba has an indication that continued operation at the IPC threshold is unjustified, Unit 1 will be shutdown and inspected.

In addition to the pulled tube data discussed above, Duke Power will pursue an industry approved voltage burst correlation through EPRI and finalize the Catawba Unit 1 and the Belgian voltage renormalization. Duke Power will also evaluate the margin gained by analyzing tube support plate displacement during a LOCA and Safe Shutdown Earthquake event. The results of these analyses along with any applicable industry data which is available will be incorporated into the Catawba submittal which will be made during the first quarter of 1993.

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Change: NRC PDR 1
ADD: NSIC 1
ADD: R. Martin (14428) 1

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Enclosed are WCAP-13494 and WCAP-13496. These WCAPs contain information which is proprietary to Westinghouse and EPRI. The necessary proprietary affidavits are provided. The non-proprietary version of WCAP-13496 (WCAP-13497) is also enclosed. The non-proprietary version of WCAP-13494 (WCAP-13495) will be submitted by Westinghouse on September 18, 1992. These WCAPs contain information which justifies a one volt interim plugging criteria for Catawba Unit 1.

Enclosed are:

1. 9 copies of WCAP-13496, "Catawba Unit 1 Steam Generator Tube Interim Plugging Criterion Presentation Materials" (Proprietary).
2. 4 copies of WCAP-13497, "Catawba Unit 1 Steam Generator Tube Interim Plugging Criterion Presentation Materials" (Non-Proprietary).
3. 10 copies of WCAP-13494, "Catawba Unit 1 Technical Support for Steam Generator Interim Tube Plugging Criteria for Indications at Tube Support Plates" (Proprietary).

Also enclosed are Westinghouse authorization letters, CAW-92-353 and CAW-92-356, accompanying affidavits for CAW-92-353 and CAW-92-356, Proprietary Information Notice, and Copyright Notice.

As Item 1 and 3 contain information proprietary to Westinghouse Electric Corporation, they are supported by affidavits signed by Westinghouse, the owner of the information. The affidavits set forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of Section 2.790 of the Commission's regulations.

Accordingly, it is respectfully requested that the information which is proprietary to Westinghouse be withheld from public disclosure in accordance with 10 CFR Section 2.790 of the Commission's regulations.

Correspondence with respect to the copyright or proprietary aspects of the items listed above or the supporting Westinghouse Affidavits should reference CAW-92-353 or CAW-92-356 and should be addressed to Nicholas J. Liparulo, Manager of Nuclear Safety and Regulatory Activities, Westinghouse Electric Corporation, P.O. Box 355, Pittsburgh, Pennsylvania 15230-0355.

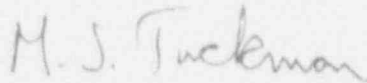
Also enclosed is Catawba's summary of the information contained in the above WCAPs.

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Catawba Unit 1 is currently scheduled to reach Mode 4 on Sunday, September 20, 1992. Therefore, it is requested that this amendment be approved by that date.

Pursuant to 10 CFR 50.91(b)(1), the appropriate South Carolina State Official was provided a copy of this amendment request.

Very truly yours,



M. S. Tuckman

MHH/SGWCAP.COV

Enclosures

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xc: Mr. S. D. Ebnetter
Regional Administrator, Region II

Mr. Heywood Shealy, Chief
Bureau of Radiological Health
South Carolina Department of Health

Mr. Robert E. Martin, Project Manager

Mr J. Stang, Project Manager

Mr. W. T. Orders
NRC Senior Resident Inspector

American Nuclear Insurers
c/o Dottie Sherman, ANI Library
The Exchange, Suite 245
270 Farmington Avenue
Farmington, CT 06032

M&M Nuclear Consultants
1221 Avenue of the Americas
New York, New York 10020

INPO Records Center
Suite 1500
1100 Circle 75 Parkway
Atlanta, Georgia 30339

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M. S. Tuckman, being duly sworn, states that he is Vice President of Duke Power Company, Catawba Nuclear Site; 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-35, and that all the statements and matters set forth therein are true and correct to the best of his knowledge.

M. S. Tuckman

M. S. Tuckman, Vice President
Catawba Nuclear Site

Subscribed and sworn to before me the 16 day of SEPTEMBER, 1992.

Charles P. Montgomery
Notary Public

My Commission expires:

My Commission Expires April 13, 1993

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bxc: R. L. Gill
D. B. Mayes
W. A. Haller
R. A. Kaye
J. M. Shuping
B. B. Lowery
R. C. Futrell
T. P. Harrall
R. O. Sharpe
D. V. Ethington
NCMPA-1
NCEMC
PMPA
SREC
File: CN-801.01
Catawba Document Control: 801.01

RE: WCAP-13494 - *"Catawba Unit 1 Technical Support for Steam Generator Interim Tube Plugging Criteria for Indications at Tube Support Plates"*, Sept. 1992

WCAP-13496 - *"Catawba Unit 1 Steam Generator Tube Interim Plugging Criterion Presentation Materials"* Sept. 1992

AFFIDAVIT

I, ARTHUR KENNY, ESQ., being duly sworn, depose and state as follows:

I am a Licensing Administrator of the Electric Power Research Institute ("EPRI") and I have been specifically delegated responsibility for reviewing the reports listed above that are sought under this affidavit to be withheld (the "Reports") and authorized to apply for its withholding on behalf of EPRI. This affidavit is submitted to the Nuclear Regulatory Commission ("NRC") pursuant to 10 CFR 2.790 (a)(4) based on the fact that the Reports consists of trade secrets of EPRI and that the NRC will receive the Reports from EPRI under privilege and in confidence.

Westinghouse Electric Corporation ("Westinghouse") prepared the Reports under contract to Duke Power Company. Some of the data (the EPRI DATA) contained in the reports were generated by Westinghouse under contract to EPRI. Although Westinghouse is the author of the Reports, Westinghouse has assigned to EPRI all right, title, and interest of the EPRI DATA in the Reports and in copyrights thereto, trade secrets contained therein, and all other intellectual property rights thereto. Westinghouse has placed proprietary markings on the report to protect EPRI's interest in the Reports.

The basis for which the Reports should be withheld from the public is set forth below:

(i) The Reports have been held in confidence by EPRI. All those accepting the Reports must agree to preserve the confidentiality of the Reports.

(ii) The Reports are of a type customarily held in confidence by EPRI and there is a rational basis therefor. The Reports are trade secrets and is held in confidence by EPRI because to disclose it would prevent EPRI from licensing the Reports at fees which would allow EPRI to recover its investment. If consultants and other businesses providing services in the nuclear power industry were able to publicly obtain the Reports, they would be able to use it commercially for profit and avoid spending the large amount of money that EPRI was required to spend to prepare the Reports. The rational basis that EPRI has for classifying the Reports as trade secrets is the Uniform Trade Secrets Act which California adopted in 1984 and which has been adopted by over twenty states. The Uniform Trade Secrets Act defines a "trade secret" as follows:

"Trade secret" means information, including a formula, pattern, compilation, program, device, method, technique, or process, that:

(1) Derives independent economic value, actual or potential, from not being generally known to the public or to other persons who can obtain economic value from its disclosure or use; and

(2) Is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.

(iii) The Reports will be transmitted to the NRC in confidence.

(iv) The Reports are not available in public sources. EPRI developed the Reports only after making a determination that the Reports were not available from public sources. It required a large expenditure of dollars for EPRI to develop the Reports. In addition, EPRI was required to use a large amount of time of EPRI employees. The money spent, plus the value of EPRI's staff time in preparing the Reports, show that the Reports is highly valuable to EPRI. Finally, the Reports was developed only after a long period of effort of at least several months.

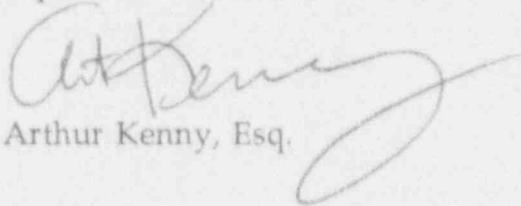
(v) A public disclosure of the Reports would cause substantial harm to EPRI's competitive position and the ability of EPRI to license the Reports both domestically and internationally. The Reports can be properly acquired or duplicated by others only with an equivalent investment of time and effort.

Affidavit of Arthur Kenny
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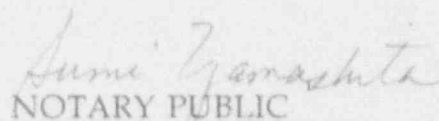
I have read the foregoing and the matters stated therein are true and correct to the best of my knowledge, information and belief. I make this affidavit under penalty of perjury under the laws of the United States of America and under the laws of the State of California.

Executed at 3412 Hillview Avenue, Palo Alto, being the premises and place of business of the Electric Power Research Institute:

September 17, 1992


Arthur Kenny, Esq.

Subscribed and sworn before me this day:


NOTARY PUBLIC

