

Attachment 1

Proposed Amendment to Catawba Unit 1
Technical Specification 3/4.8.1.1 Concerning the Cathodic Protection System

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ELECTRICAL POWER SYSTEMSLIMITING CONDITION FOR OPERATIONACTION (Continued)

2. When in MODE 1, 2, or 3 with a steam pressure greater than 90C psig, the steam-driven auxiliary feedwater pump is OPERABLE.

If these conditions are not satisfied within 2 hours be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

- d. With two of the above required offsite A.C. circuits inoperable, demonstrate the OPERABILITY of two diesel generators by performing Specification 4.8.1.1.2a.4) within 1 hour and at least once per 8 hours thereafter, unless the diesel generators are already operating; restore at least one of the inoperable offsite sources to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours. With only one offsite source restored, restore at least two offsite circuits to OPERABLE status within 72 hours from time of initial loss or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- e. With two of the above required diesel generators inoperable, demonstrate the OPERABILITY of two offsite A.C. circuits by performing Specification 4.8.1.1.1a. within 1 hour and at least once per 8 hours thereafter; restore at least one of the inoperable diesel generators to OPERABLE status within 2 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. Restore at least two diesel generators to OPERABLE status within 72 hours from time of initial loss or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.8.1.1.1 Each of the above required independent circuits between the offsite transmission network and the Onsite Essential Auxiliary Power System shall be:

- a. Determined OPERABLE at least once per 7 days by verifying correct breaker alignments, indicated power availability, and
- b. Demonstrated OPERABLE at least once per 18 months during shutdown by transferring (manually and automatically) unit power supply from the normal circuit to the alternate circuit.

4.8.1.1.2 Each diesel generator shall be demonstrated OPERABLE:

- a. In accordance with the frequency specified in Table 4.8-1 on a STAGGERED TEST BASIS by:
 - 1) Verifying the fuel level in the day tank,

f. With the Cathodic Protection System inoperable for more than 60 days, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 10 days outlining the cause of inoperability and the plans for restoring the system to OPERABLE status.

ELECTRICAL POWER SYSTEMSSURVEILLANCE REQUIREMENTS (Continued)

- 2) Verifying the fuel level in the fuel storage tank,
 - 3) Verifying the fuel transfer valve can be operated to allow fuel to be transferred from the storage system to the day tank,
 - 4) Verifying the diesel starts from ambient condition and accelerates to at least 441 rpm in less than or equal to 11 seconds. The generator voltage and frequency shall be 4160 ± 420 volts and 60 ± 1.2 Hz within 11 seconds after the start signal. The diesel generator shall be started for this test by using one of the following signals:
 - a) Manual, or
 - b) Simulated loss of offsite power by itself, or
 - c) Simulated loss of offsite power in conjunction with an ESF Actuation test signal, or
 - d) An ESF Actuation test signal by itself.
 - 5) Verifying the generator is synchronized, loaded to greater than or equal to 7000 kW in less than or equal to 60 seconds, and operates for at least 60 minutes, and
 - 6) Verifying the diesel generator is aligned to provide standby power to the associated emergency busses.
- b. At least once per 31 days and after each operation of the diesel where the period of operation was greater than or equal to 1 hour by checking for and removing accumulated water from the day tank;
 - c. At least once per 31 days by checking for and removing accumulated water from the fuel oil storage tanks;
 - d. By verifying that the Cathodic Protection System is OPERABLE* by verifying:
 - 1) At least once per 60 days that cathodic protection rectifiers are OPERABLE and have been inspected in accordance with the manufacturer's inspection procedures, and
 - 2) At least once per 12 months that adequate protection from corrosion is provided in accordance with manufacturer's inspection procedures.
 - e. By sampling new fuel oil in accordance with ASTM-D4057 prior to addition to storage tanks and:

* The Cathodic Protection System need not be OPERABLE until after the first refueling outage.

JUSTIFICATION AND ANALYSIS OF SIGNIFICANT HAZARDS CONSIDERATION

The proposed amendment would allow the Cathodic Protection System to be inoperable until after the first refueling outage. An ACTION statement would be added to specifically address the actions to be taken if the cathodic protection system should ever be declared inoperable.

A detailed review and check of the cathodic protection system at Catawba indicates that the existing system will not completely protect the diesel fuel oil system without causing accelerated corrosion on other piping in close proximity to the diesel fuel oil system. The solution to the problem is to supplement the existing cathodic protection system with an additional small system dedicated only to the diesel fuel oil system.

Current Technical Specifications require cathodic protection of the diesel fuel oil system. The purpose of cathodic protection is to protect structures from the long term effects of corrosion. At Catawba, corrosion of piping systems without cathodic protection is not considered a problem due to the high average soil resistivity at the location. Thus, deferral of the application of cathodic protection to the diesel fuel oil system for the time period required to design and install the dedicated cathodic protection system is not considered significant from a corrosion point of view. We would expect that the system could be installed and operational by the first refueling outage of Unit 1. Hence, a deferral of current technical specification requirements for cathodic protection of the diesel fuel oil system is necessary.

In addition, the current wording of the surveillance requirements for the cathodic protection system for the diesel fuel oil system should be revised as marked. Due to the nature of a cathodic protection system in general, and particularly due to the inherent low natural corrosion potential at Catawba, the inoperability of the cathodic protection system at Catawba for a 6 to 12 month period is not considered to be a significant problem. The modification of the ACTION statement wording as marked also is considered necessary to permit normal maintenance and replacement of system components over the life of the plant.

10 CFR 50.92 states that a proposed amendment involves no significant hazards considerations if operation in accordance with the proposed amendment would 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 a margin of safety.

The proposed amendment does not increase the probability or consequences of an accident previously evaluated and it does not create the possibility of a new or different kind of accident.

The proposed amendment does not involve a significant reduction in a margin of safety for the reasons cited above. Therefore, Duke Power Company concludes that the proposed amendment does not involve significant hazards considerations.