

Catawba Nuclear Station
IWP/IWV Program

Response to Open Items

- Item C.1: Revision 8 to the IST Submittal adds these valves as Category C valves. In addition, Relief Request #A03 has been added to allow testing of these valves during refueling since valve/system design provides no indication of valve closure upon flow reversal. Initial testing of these valves will be performed during the first refueling outage.
- Item C.2: Revision 8 to the IST Submittal changes the limiting stroke time for these valves to ≤ 20 seconds.
- Item G.4: Revision 8 to the IST Submittal changes the frequency of testing for these valves to cold shutdown. Relief Request #E04 is being submitted to justify this frequency.
- Items I.7 & I.8: Relief Requests #H03 and H05 in the IST Submittal have been changed in Revision 8 to reflect implementation of a sample valve disassembly program to be performed during each refueling.
- Item K.1: Relief Request #I01 in the IST Submittal has been changed in Revision 8 to reflect implementation of a sample valve disassembly program to be performed during each refueling.
- Item P.1.A: Revision 8 to the IST Submittal adds these valves as Category C valves. In addition, Relief Request #BB1 has been added to allow testing the backflow prevention function of these valves during refueling since valve/system design provides no indication of valve closure upon flow reversal. Initial testing of the backflow prevention function will be performed during the first refueling outage.
- Items R.2 and R.3: Relief Request #W01 and #W02 in the IST Submittal have been changed in Revision 8 to reflect a test method performed during cold shutdown to verify operability of the left and right starting air banks individually. Initial run of this test will be performed during the next cold shutdown of sufficient duration.

Items U.1
& U.2:

These valves control chilled water flow through the Control Room and Control Room Area air handling units. Under normal operating conditions, these valves modulate from an electro-pneumatic signal supplied by temperature controllers monitoring room temperature. In the event control air is lost, the valves continue to modulate from an electrical signal supplied by an RTD in the return air duct work. This electrical signal is supplied by Class 1E (Safety Related) power. During normal operation, any malfunctioning of these valves would be detected by an increase or decrease in room temperature. Heat loads for the areas supplied by these air handling units are essentially the same for normal operation or accident conditions. These valves are not supplied with limit switches to indicate valve position in the control room since their safety function is to continue to modulate during accident conditions. (During the accident, credit is not taken for these valves to go to a "FAIL" position).

It is felt that proper normal operation of the system (as verified by its ability to maintain the area within the Technical Specification temperature limits) is adequate to ensure the valves will perform their safety function during an accident. Therefore, these valves will not be included in the IST Program.