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November 8, 1984

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Ms. E. G. Adensam, Chief
Licensing Branch No. 4

Re: Catawba Nuclear Station
Docket Nos. 50-413 and 50-414

Dear Mr. Denton:

On March 9, 1983, Duke Power Company submitted the Catawba Nuclear Station (Unit 1) Pump and Valve Inservice Testing Program pursuant to 10 CFR 50.55a(g). Revisions to the program were submitted on July 10, 13, 18, 23, 27 and October 1, 1984. In accordance with 10 CFR 50.55a(g)(5)(iii), Section D of the program document identified certain pumps and valves which could not be tested in conformance with ASME Code requirements. In accordance with 10 CFR 51.41, the following is Duke Power's evaluation of environmental impacts of the requested relief.

Identification of Proposed Action

The requested relief would relieve Duke Power from meeting certain requirements of the ASME Code, Section XI, Subsections IWV and IWP. The specific relief requests are identified in Section D of the Catawba Nuclear Station (Unit 1) Pump and Valve Inservice Testing Program. Alternative tests and/or test frequencies have also been identified as a part of each relief request.

Need for the Proposed Action

Testing of the identified pumps and valves at the ASME Code required frequencies could place the unit in a mode of operation that could lead to equipment damage or unit shutdown, or the testing simply cannot be done due to the plant design. Testing of these pumps and valves to the proposed alternative frequencies or methods will adequately ensure the operability of the equipment. Imposition of the ASME Code requirements would result in hardships or unusual difficulties without a compensating increase in the level of quality or safety.

Environmental Impacts of the Proposed Actions

As previously stated, testing of these pumps and valves at the proposed alternative test frequencies or methods will adequately ensure the operability of the equipment, therefore the requested relief would not

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affect the risk of facility accidents. Conversely, testing of some of the affected pumps and valves under the conditions required by the ASME Code could result in unit trips, damage to equipment and an increase in the risk of facility accidents. Thus it can be concluded that post-accident radiological releases will not be greater than previously determined nor does the proposed relief otherwise adversely affect radiological plant effluents, nor any significant occupational exposure. Likewise, the relief does not affect non-radiological plant effluents and has no other environmental impact.

Conclusion

It is our conclusion that there are no adverse radiological or non-radiological environmental impacts associated with the requested exemption.

Very truly yours,

Hal B. Tucker

ROS:slb

cc: Mr. James P. O'Reilly, Regional Administrator
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