

MEMORANDUM TO: Richard V. Crlenjak, Chief
Projects Branch No. 3
Division of Reactor Projects
Region II

July 25, 1996

THROUGH: Herbert N. Berkow, Director
Project Directorate II-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

FROM: Peter S. Tam, Project Manager
Project Directorate II-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

SUBJECT: CATAWBA NUCLEAR STATION - COMPLETION OF REVIEW, 10 CFR 50.59
ANNUAL SUMMARY COVERING OCTOBER 1994 THRU SEPTEMBER 1995
(TAC M95486 AND M95487)

By letter dated March 27, 1996 (erroneously dated as 1995), the licensee submitted its annual summary of all changes, tests, and experiments which were completed under the provisions of 10 CFR 50.59 for the period October 1, 1994, to September 30, 1995. The licensee's summary includes about 220 changes made during the subject period. I evaluated these changes against the provisions of the regulation, following the guidance in Section 3.4.4 of the Project Manager's Handbook, Revision 1, and parts of Inspection Procedure 37001, "10 CFR 50.59 Safety Evaluation Program" that may be interpreted as pertinent to the project manager.

Attached is a feeder report that you may incorporate into one of your inspection reports. I understand that Randy Moore of Region II has performed a 10 CFR 50.59 inspection. His results and mine are expected to be complementary; should there be contradictory findings, please contact me.

Attachment: As stated

Docket Nos. 50-413
and 50-414

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

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FEEDER TO AN UPCOMING INSPECTION REPORT

The term "inspector" is used in the following input to be consistent with the style of an inspection report. However, all onsite work was performed as part of an NRR review, specifically, in a meeting closed to the public as defined in Management Directive 3.5, and in accordance with NRR site review practices delineated in Office Letter 1200. A more appropriate term to be used in the inspection report may be "reviewer".

X.0 Changes, Tests and Experiments Performed In Accordance With 10 CFR 50.59 (October 1, 1994, to September 30, 1995)

X.1 Scope

By letter dated March 27, 1996 (erroneously dated as 1995), the licensee submitted its annual summary of all changes, tests, and experiments which were completed under the provisions of 10 CFR 50.59 for the period October 1, 1994, to September 30, 1995. The licensee's March 27, 1996, summary includes about 220 changes made during the subject period. The inspector evaluated these changes against the provisions of the regulation.

X.2 Evaluation

10 CFR 50.59 provides that a licensee may (1) make changes in the facility as described in the safety analysis report, (2) make changes in the procedures as described in the safety analysis report, (3) conduct tests or experiments not described in the safety analysis report, without prior Commission approval, unless the change involves a change in the technical specifications or an unreviewed safety question (USQ). The regulation defines a USQ as a proposed action that (a) may increase the probability of occurrence or consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report, (b) may create a possibility for an accident or malfunction of a different type than any previously evaluated in the safety analysis report, (c) may reduce the margin of safety as defined in the basis for any technical specification.

The inspector reviewed the licensee's current (dated March 31, 1996) version of Nuclear System Directive 209, "10 CFR 50.59 Evaluations," which is patterned after NSAC-125, "Guidelines for 10 CFR 50.59 Safety Evaluations," June 1989. This document requires that changes be evaluated against appropriate Final Safety Analysis Report (FSAR), Technical Specifications, and NRC Safety Evaluation Report sections to determine if there is need for revision. Specifically, the criteria specified by 10 CFR 50.59 are broken down into seven (7) questions. For a change to be qualified for 10 CFR 50.59, the answers to all seven questions must be "no". The inspector concludes that the licensee's directive appropriately reflects the criteria of this regulation and that, if followed accordingly, would ensure that a change be correctly performed under this regulation.

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The inspector performed an in-office review of the licensee's summary to determine the nature and safety significance of each change. Through this review, the inspector selected the following changes for more detailed review onsite:

Procedure changes -

OP/1/A/6100/02, Controlling Procedure for Unit Shutdown
OP/1/A/6400/25, Operating Procedure for the Addition of Chemicals to Safety-Related Cooling Water System

OP/2/A/6400/25, Operating Procedure for the Addition of Chemicals to Safety-Related Cooling Water System

PT/1/A/4400/01, ECCS Flow Balance

TSM94094545-01, Raise Setpoint of the High Delta P and Extra High Delta P Alarms for 2 RAPG-5010 (regarding condenser tube cleaning system strainer screens)

TSM95046111-01, Install Temporary HVAC Duct for Steam Generator B Manway Repair

TSM95061427-01, Adjust Bistable 2-FB-160 to 5.5 GPM to Silence Nuisance Alarm Due to Hi Flow Thru RCP 2B Greater Than 5 GPM

Modifications -

CN-11343, Letdown Orifice Replacement

CN-20672, Removal of Noble Gas from the Auxiliary Building

CN-21303, Removal of VE [Annulus Ventilation] Tornado Isolation Dampers and Replacement With Backdraft Dampers

Exempt changes -

CE-3100, Provide An Access Hole in the Main Steam System Piping for SG 2B

CE-4674, Add Vent Valves to the ND [Residual Heat Removal System] Heat Exchanger and ND Pump Vent Lines

CE-4819, Installation of Oil Addition Piping to the Reactor Coolant Pump Motors

CE-60239, Replace NM [Nuclear Sampling] System Valves to Prevent Sample Cross Contamination

The inspector determined that these changes were correctly performed under 10 CFR 50.59.

During the in-office and onsite reviews, the inspector made a number of observations and has communicated them to licensee personnel (Devereaux Tower):

1. The use of Duke-specific system identifiers in the annual summary (which is submitted to the NRC and is thus available to the public) is discouraged unless the licensee provides a key in the summary. These identifiers do not bear any apparent correlation to the actual systems, e.g., NC = reactor coolant system, KC = component cooling system.

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2. The licensee's corresponding revision of the Updated FSAR (UFSAR) lags behind a 10 CFR 50.59 evaluation. For example, PT/O/A/4200/23 (on Page 22 of Part 1 of the summary) has been revised to require two, instead of four, reactor coolant pumps operating while pressurizer minimum spray flow is being set. FSAR Section 14.5.31, as revised on May 28, 1996, still says four reactor coolant pumps be operating.
3. While the licensee had acceptably evaluated all the changes audited by the inspector, a number of them appeared in the summary with scarce information for a reader to even determine what system was involved, or what change was made. For examples, see TSM94094545-01, CN-10951, CN-11064, CN-19040, CN-50428, CN50454, CE-4740, CE-60188. The inspector recommended a one- or two- sentence description, identifying the system, the component, and the nature of the change.
4. For some changes, the licensee simply asserted that "USQ evaluation is not applicable to this modification" with no explanation given in the summary. For example, see TSM95035851-01.
5. The term "Exempt Changes" may cause confusion in the context of 10 CFR 50.59. In reality, it has nothing to do with the regulation but is a term internal to the licensee. It pertains to changes that "do not require the Modification Program controls for configuration management and therefore are specifically exempted from the requirements to process an editorial NM or NSM."

The inspector's observations did not lead to any violation since they were sufficiently resolved by the licensee's evaluations onsite.

X.3 Conclusion

Based on in-office review of the licensee's March 27, 1996, annual summary on 10 CFR 50.59 changes, and audit of the licensee's procedures and evaluations, the inspector concludes that the licensee has complied with the provisions of this regulation for the changes listed in the annual summary.

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