Official file

MAR 18 1988

MEMORANDUM FOR: Thomas E. Murley, Director, Office of Nuclear Reactor Regulation
James M. Taylor, Deputy Executive Director for Regional Operations
James Lieberman, Director, Office of Enforcement

FROM: J. Nelson Grace, Regional Administrator

SUBJECT: ENFORCEMENT DISCRETION FOR CATAWBA NUCLEAR STATION, UNIT 2, DOCKET NO. 50-414

The purpose of this memorandum is to document that on February 25, 1988, Duke Power Company (DPC) was verbally granted a one-time 12-hour relief from compliance with the Technical Specification (TS) Limiting Condition for Operation (LCO) Action Statement 3.7.1.2(a), Auxiliary Feedwater System. The LCO action statement requires with one auxiliary feedwater pump inoperable restoration of the required auxiliary feedwater pump to operable status within 72-hours or be in at least Hot Standby within the next 6-hours and in Hot Shutdown within the following 6-hours. The unit was in Hot Standby at the time of this request. The TS relief allowed DPC to delay the requirement to be in Hot Shutdown by 12-hours. This relief was granted by Region II per the February 27, 1987, memorandum to Regional Administrators from Harold R. Denton and James M. Taylor regarding relief from Technical Specification LCOs.

As described in Enclosure 1, the 12-hour extension was granted for the purpose of avoiding an unnecessary thermal transient of the plant while giving DPC sufficient time to repair the turbine driven auxiliary feedwater pump governor and servo mechanism under hot conditions. Further testing of the pump revealed additional problems and it was determined by DPC that necessary repairs and testing would not be completed within the extended LCO period. The unit was taken to Hot Shutdown after using 11-hours and 32-minutes of the relief.

Prior to relief being granted, the technical issues and extent of enforcement discretion were discussed with J. N. Grace, V. L. Brownlee and K. VanDoorn of Region II; D. Hood of NRR; and, N. Rutherford, J. Hampton and L. Hartzell of DPC.

ORIGINAL SIGNED BY:
J. NELSON GRACE

J. Nelson Grace

Enclosures:
1. DPC to NRC letter dated February 29, 1988
2. NRC to DPC letter dated March 14, 1988

cc w/encls: (See page 2)

IE01

cc w/encls:
G. C. Lainas, NRR
K. Jabbour, NRR
W. Troskoski, EDO
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L. A. Reyes
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NRC Resident Inspector
Document Control Desk
State of South Carolina

RII	RII	RII	RII	RII
BBonser	VBrownlee	AGibson	LReyes	MErnst
3/17/88	3/11/88	3/17/88	3/17/88	3/ /88

ENCLOSURE 1

DUKE POWER COMPANY
P.O. BOX 33189
CHARLOTTE, N.C. 28242

HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

TELEPHONE
(704) 373-4

February 29, 1988

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555

Subject: Catawba Nuclear Station, Unit 2
Docket No. 50-414
Discretionary Enforcement Relief from
Technical Specification 3.7.1.2

Gentlemen:

This letter constitutes written follow-up of a request for temporary waiver of Technical Specification requirements which was made (and subsequently granted) via a telecon between Duke Power Company personnel and members of your staff on February 25, 1988. This temporary emergency relief from compliance with the Technical Specification Limiting Conditions for Operation (LCO) Action Statement was requested to avoid unnecessarily forcing Catawba Unit 2 to Mode 4 (HOT SHUTDOWN) since the LCO Action Statement would have expired at 0515 hours on February 26, 1988.

The proposed relief request was the result of the Auxiliary Feedwater System Turbine Driven Pump (CAPT) inoperability due to turbine speed control problems. The CAPT was declared inoperable at 0515 hours on February 23, 1988 and Mode 3 (HOT STANDBY) had been entered at 2359 hours on February 21, 1988. Continued inoperability of the CAPT without Discretionary Enforcement would have required the unit to enter Mode 4 (HOT SHUTDOWN) by 1115 hours on February 26, 1988.

Duke Power Company personnel repaired the turbine governor and servo mechanism in order to resolve the turbine speed control problem. Further testing revealed additional problems and it was determined that necessary repairs and testing would not be completed within the extended LCO period. The decision was made to cooldown to Mode 4 and continue repairs to the turbine. Mode 4 was entered at 2247 hours on February 26, 1988.

The function of the CA system is to provide feedwater to the S/G's in the event that the Condensate/Feedwater System is lost. This water ensures a decay heat removal path to cool the Reactor Coolant System until such time that the Residual Heat Removal System may be operated. The CA motor-driven pumps remained operable throughout this event.

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A Safety Evaluation (attached) was completed in accordance with 10CFR 50.59. This Safety Evaluation concluded that no unreviewed safety question exists and that granting this request posed no undue risk to the health and safety of the public.

Very truly yours,

Hal B. Tucker

Hal B. Tucker

RWO/36/jgc

Attachment

xc: Dr. J. Nelson Grace, Regional Administrator
U.S. Nuclear Regulatory Commission
Region II
101 Marietta St., NW, Suite 2900
Atlanta, Georgia 30323

Mr. P.K. Van Doorn
NRC Resident Inspector
Catawba Nuclear Station

NUCLEAR SAFETY EVALUATION CHECKLIST

The extension of the turbine driven auxiliary feedwater pump inoperability time in Mode 3 by 12 hours does not create the possibility of an accident which is outside the parameters previously evaluated in the FSAR.

The plant status at the time the inoperability period extension would take effect is as follows:

- The reactor has been in a refueling outage for the past 64 days and therefore thermal reactor power is at a reduced level.

- The present major heat source in the Reactor Coolant System is the heat addition of the Reactor Coolant Pumps. The heat energy added by these pumps is not adequate for extended operation of the Turbine Driven Auxiliary Feedwater Pump. Therefore, the Turbine Driven Auxiliary Feedwater Pump would not presently be a viable option for plant cooldown given the present plant condition.

- Both motor driven auxiliary feed pumps are operable and their associated emergency diesel generators are operable.

- All required Emergency Core Cooling Systems are operable.

During the worst case accident evaluated in the FSAR, a main feedwater line break, with the above initial conditions, the inoperability of the turbine driven auxiliary feedwater pump will not prevent taking the reactor to Mode 4 and initiating the Residual Heat Removal System. The reactor could be taken to Mode 4 using one or both of the following:

- The motor driven auxiliary feedwater pumps.

- The use of the pressurizer PORVs and available steam generator inventory to reduce reactor pressure to allow the initiation of feed and bleed procedures using the safety injection pumps.

Based upon the plant condition and the availability of other plant equipment as discussed above, it has been determined that the extension of the turbine driven auxiliary feedwater pump inoperability time in Mode 3 by 12 hours did not create an unreviewed safety question.

ENCLOSURE 2

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30323

MAR 14 1988

Docket No. 50-414
License No. NPF-52

Duke Power Company
ATTN: Mr. H. B. Tucker, Vice President
Nuclear Production Department
422 South Church Street
Charlotte, NC 28242

Gentlemen:

SUBJECT: ENFORCEMENT DISCRETION FOR CATAWBA NUCLEAR STATION, UNIT 2, DOCKET NO. 50-414

This letter acknowledges your letter of February 29, 1988, requesting relief from the Action Statement of Technical Specification 3.7.1.2 (a) Auxiliary Feedwater System. In your telephone conversations with Region II staff on February 25, 1988, you were informed that discretionary enforcement action would be granted to extend the referenced action statement by 12 hours.

Should you have any questions regarding this letter, please contact us.

Sincerely,

J. Nelson Grace
Regional Administrator

cc: T. B. Owen, Station Manager

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