

**DUKE POWER COMPANY**

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February 21, 1986

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

Attention: Mr. B. J. Youngblood, Project Director  
PWR Project Directorate No. 4

Re: Catawba Nuclear Station, Unit 2  
Docket No. 50-414

Dear Sir:

On January 16, 1986, the NRC issued the "Final Draft" Technical Specifications for Catawba Units 1 and 2. Mr. Youngblood's letter requested that Duke review the Technical Specifications and certify that they accurately reflect the as-built plant and relevant documentation.

The Technical Specifications for Catawba Units 1 and 2 were developed from the Catawba Unit 1 Technical Specifications which were initially issued as a part of Facility Operating License NPF-24 on July 18, 1984. Catawba Units 1 and 2 are nearly identical units as reflected by the relatively few changes necessary to incorporate Unit 2 into the Unit 1 Technical Specifications.

As shown by Attachment 1, development of the Catawba Units 1 and 2 Technical Specifications began after issuance of the Catawba Unit 1 full power license. The proposed Technical Specifications which were submitted on March 15, 1985 included input from Duke's Design Engineering and Nuclear Production Departments, Catawba Nuclear Station and the NSSS vendor, Westinghouse Electric Corporation. These groups have been involved throughout the development process. Each group reviewed the "Final Draft" Technical Specifications and provided comments. A summary of these comments was submitted to the NRC on February 10 and 18, 1986. These comments were incorporated in revised "Final Draft" replacement pages which were transmitted by the NRC on February 21, 1986.

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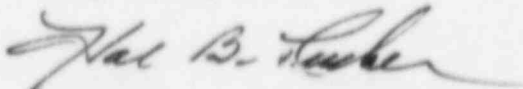
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During our review of the Catawba Units 1 and 2 Technical Specifications, it was noted that a few Specifications no longer agree with the FSAR. These differences were the result of revised analyses. In each case the Technical Specifications were conservative. An example is Specifications 3.8.1.1 which requires a minimum fuel oil volume which corresponds to the previous diesel rating of 7000 kw rather than the current limit of 5750 kw.

As a result of experience gained with the Catawba Unit 1 Technical Specifications since issuance of the operating license, changes to a number of Technical Specifications have been identified which would simplify operation, increase unit reliability or eliminate overly restrictive specifications. A number of amendment requests were filed with the NRC; others are still under development. The amendment requests that were submitted and approved have been incorporated in the Catawba Units 1 and 2 Technical Specifications. Duke will continue to pursue other improvements in the Catawba Units 1 and 2 Technical Specifications after issuance of the Catawba Unit 2 operating license. None of these changes are deemed necessary for safe operation of either unit.

Based on the extensive preparation and review effort that has gone into the development of the Catawba Units 1 and 2 Technical Specifications, Duke Power Company certifies that, to the best of our knowledge, the "Final Draft" Catawba Units 1 and 2 Technical Specifications, conservatively reflect the as-built plant and the Catawba FSAR. Furthermore, we are not aware of any conflicts between the "Final Draft" Catawba Units 1 and 2 Technical Specifications and the NRC Staff's SER analyses.

Very truly yours,



Hal B. Tucker

ROS:yj

Attachment

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

NRC Resident Inspector  
Catawba Nuclear Station

Attachment 1  
Catawba Nuclear Station  
Technical Specifications

Milestones

Catawba Unit 1 Technical Specification Issued With FOL NPF-35	01/17/85
Proposed Catawba Units 1 and 2 Technical Specifications Submitted	03/15/85
First Draft CNS 1 and 2 Technical Specifications Issued by NRC	07/05/85
NRC Site Visit to Review Technical Specifications	07/22-24/85
Proof and Review CNS 1 and 2 Technical Specifications Issued by NRC	10/10/85
Final Draft CNS 1 and 2 Technical Specifications Issued by NRC	01/16/85
NRC/Region II Audit of CNS 1 and 2 Technical Specifications	01/86
Revised Final Draft Pages Issued by NRC	02/21/86
Letter of Certification Submitted	02/21/86