



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 164 TO FACILITY OPERATING LICENSE NPF-52

DUKE ENERGY CORPORATION, ET AL.

CATAWBA NUCLEAR STATION, UNIT 2

DOCKET NO. 50-414

1.0 INTRODUCTION

On August 6, 1998, Duke Energy Corporation, et al. (DEC), determined that Surveillance Requirement (SR) 4.8.1.1.2.i.2 of the Catawba Nuclear Station, Units 1 and 2, Technical Specifications (TS) was not being met at Unit 1. SR 4.8.1.1.2.i.2 requires the performance, every 10 years, of a pressure test of those portions of the diesel fuel oil system, associated with the emergency diesel generators (EDGs), designed to Section III, subsection ND of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code) at a test pressure equal to 110 percent of the system design pressure.

By letter dated August 6, 1998, DEC requested that the NRC exercise discretion not to enforce compliance with the actions required by SR 4.8.1.1.2.i.2. The letter documented information previously discussed with the staff in a telephone conversation on August 6, 1998. As a result of its review, the staff verbally granted enforcement discretion on August 6, 1998, to Unit 1 and affirmed that decision by a Notice of Enforcement Discretion (NOED) letter dated August 7, 1998 (98-6-013).

By separate letter dated August 6, 1998, DEC submitted a request for amendments, on an exigent basis, to delete SR 4.8.1.1.2.i.2 from the TS of Units 1 and 2. The staff had, thus, issued an amendment to the Unit 1 TS under exigent circumstances, but declined to do the same for the Unit 2 TS. The staff's evaluation of this amendment request is for Unit 2 only and is discussed herein.

2.0 DISCUSSION AND EVALUATION

The EDG fuel oil system provides for the storage of a 7-day supply of fuel oil for each EDG and supplies the fuel oil to the engine when the EDG is needed. Major components in the fuel oil system include the fuel oil storage tanks, the fuel oil day tank, pumps, valves, filters, strainers, and piping. SR 4.8.1.1.2.i.2 requires the performance, every 10 years, of a pressure test of those portions of the diesel fuel oil system, associated with the EDGs, designed to Section III, subsection ND of the ASME Code at a test pressure equal to 110 percent of the system design pressure.

DEC, however, had conducted the surveillance at Unit 1, and planned to conduct the surveillance at Unit 2, in accordance with ASME Section XI, Code Case N-498-1, which was granted for use at Catawba Units 1 and 2 by the NRC in its letter dated February 13, 1995. This relief from ASME Code requirements, in Code Case N-498-1, permits the use of VT-2 visual examination in conjunction with a system pressure test on Class 3 systems (i.e. including the diesel fuel oil system) in lieu of hydrostatic testing. The relief will expire when Code Case N-498-1, with provisions limiting its application, is published in a future revision of Regulatory Guide 1.147. TS 4.0.5 requires that "Inservice Inspection of ASME Code Class 1, 2, and 3 components...shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR Part 50, Section 50.55a(g)(6)(i)." The approval to use Code Case N-498-1 is one of the reliefs granted by the staff.

Given application of Code Case N-481-1 to the diesel fuel oil system, hydrostatic testing of the system to the requirements in SR 4.8.1.1.2.i.2 is unnecessary. Accordingly, DEC's proposal to delete SR 4.8.1.1.2.i.2 from the TS is acceptable because a staff-approved diesel fuel oil system surveillance procedure (Code Case N-498-1) will continue to be used. Surveillance requirements for nuclear plant systems and components are specified by 10 CFR 50.36(c)(3). With the deletion of SR 4.8.1.1.2.i.2, 10 CFR 50.36(c)(3) will continue to be met at Catawba Unit 2 since TS 4.0.5 will continue to ensure that the necessary quality of the diesel fuel oil system is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the South Carolina State official, Mr. Virgil Autry, was notified of the proposed issuance of the amendment. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes surveillance requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts, no significant change in the types of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (63 FR 43962 dated August 17, 1998). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: Donald Naujock
Peter S. Tam

Date: September 28, 1998