

DUKE POWER COMPANY

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HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

May 26, 1988

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

Subject: Catawba Nuclear Station, Units 1 and 2
Docket Nos. 50-413 and 50-414
Emergency Technical Specification Amendment
PORV Block Valve Position Indicator

Dear Sir:

This letter contains a proposed amendment to the Technical Specifications for Facility Operating License Nos. NPF-35 and NPF-52 for Catawba Units 1 and 2. The request involves changing the Total Number of Channels for the PORV Block Valve Position Indicator from 2/Valve to 1/Valve. This is in accordance with the design of the system and the Final Safety Analysis Report as it applies to Catawba.

It is requested that this proposed amendment be handled on an emergency basis pursuant to the provisions of 10 CFR 50.91(a)(5).

Without the requested amendment, Catawba Unit 2 will be forced to commence shutdown at 1650 hours on Friday, May 27, 1988. This is due to the fact that two of the back-up PORV Block Valve position indicators (limit switches) have been found to be inoperable. The unit was placed in a seven day Action Statement (Action a. of Specification 3.3.3.6) on Friday May 20, 1988. This Action Statement was entered when the existence of a second independent channel of position indication was called into question. A second position indication per valve was identified but appropriate surveillances had not been performed. Surveillances were identified and were subsequently done. Two of the three back-up position indicators did not pass the surveillance test. These back-up indicators cannot be repaired or replaced with the unit on-line.

On September 25, 1987 a Duke Power Problem Investigation Report (PIR) was written to address a potential conflict between the Technical Specifications and the as-built condition of the plant. The PIR problem description stated that the Technical Specifications required 2 position indications per PORV and PORV Block Valve but that there was only one channel wired per valve. The resolution to the PIR stated that there was a stem mounted limit switch on each valve which activates two independent position indicators in the control room (one on the main control board in the control room and one on the Operator Aid Computer). It was determined that this setup met the intent of the Technical Specifications and that no further action was required.

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On November 5, 1987 the NRC issued Inspection Report 413,414/87-33. In this report an Unresolved Item (URI 413,414/87-33-01) was raised which took exception to the conclusion reached in the PIR. The NRC inspectors stated that the setup of the limit switch and redundant indicators did not constitute independent channels as defined in FSAR Section 7.5.3.2. The URI called for resolution of the problem either through a hardware modification or a Technical Specification change.

On December 4, 1986 a proposed Technical Specification change was routed for internal review which would have revised the accident monitoring table.

This proposed amendment request was substantially revised and subsequently reissued for internal review once again on October 29, 1987. A Technical Specification change request was submitted on May 4, 1988 to the NRC for McGuire and Catawba which would have incorporated the Regulatory Guide 1.97 review into the accident monitoring instrumentation tables. This amendment request would have relocated to the FSAR all of the instruments except those determined to be Type A variables. The requirements for the PORV Block Valve Position Indicators would have been relocated to the FSAR. After relocation to the FSAR the intent was to change the requirements for the position indicators to reflect the one safety grade limit switch. The proposed Technical Specification amendment was rejected on May 19, 1988 as being premature due to the ongoing work in the industry Technical Specification Improvement effort.

As discussed in the attached justification, the back-up position indicators are not safety related and are not relied upon in any of the accident analyses. The Regulatory Guide 1.97 review did not address the PORV Block Valve Indicators. These indicators are not captured by any of the Regulatory Guide 1.97 criteria for classification of accident monitoring instrumentation.

For the reasons stated above, it can be concluded that the requested amendment may be processed as an emergency Technical Specification change which is justified and could not have been foreseen.

The attachment contains the proposed change and a discussion of the justification and a No Significant Hazards analysis. The analysis is included pursuant to 10 CFR 50.91 and it has been concluded that the proposed amendment does not involve significant hazards considerations.

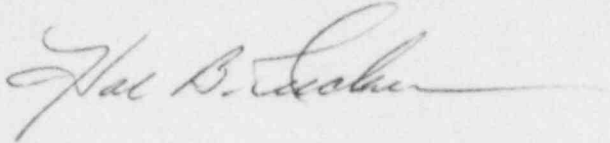
This proposal involves one amendment request to Catawba's Technical Specifications. Accordingly, pursuant to 10 CFR 170.21 a check for \$150.00 is enclosed.

Pursuant to 10 CFR 50.91 (b) (1) the appropriate South Carolina State Official is being provided a copy of this amendment request.

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In accordance with the requirements of Technical Specification 6.5.1.2 and 6.5.2.8d. this proposed amendment has been reviewed and approved by the Station Manager and the Nuclear Safety Review Board.

Very truly yours



Hal B. Tucker

RWO/17/sbn

Attachments

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

Mr. Heyward Shealy, Chief
Bureau of Radiological Health
South Carolina Department of Health &
Environmental Control
2600 Bull Street
Columbia, South Carolina 29201

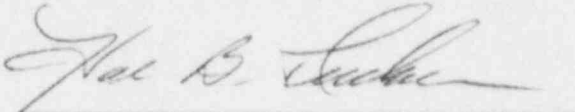
American Nuclear Insurers
c/o Dottie Sherman, ANI Library
The Exchange, Suite 245
270 Farmington Avenue
Farmington, CT 06032

M&M Nuclear Consultants
1221 Avenue of the Americas
New York, New York 10020

INPO Records Center
Suite 1500
1100 Circle 75 Parkway
Atlanta, Georgia 30339

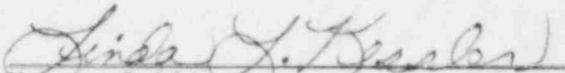
Mr. P. K. Van Doorn
NRC Resident Inspector
Catawba Nuclear Station

HAL B. TUCKER, being duly sworn, states that he is Vice President of Duke Power Company; that he is authorized on the part of said Company to sign and file with the Nuclear Regulatory Commission this revision to the Catawba Nuclear Station Technical Specifications, Appendix A to License No. NPF-35 and NPF-52; and that all statements and matters set forth therein are true and correct to the best of his knowledge.



Hal B. Tucker, Vice President

Subscribed and sworn to before me this 26th day of May, 1988.



Notary Public

My Commission Expires:



May 1, 1989

