

Attachment 1

Proposed Technical Specification Changes

TABLE 3.3-10

ACCIDENT MONITORING INSTRUMENTATION

<u>INSTRUMENT</u>	<u>TOTAL NO. OF CHANNELS</u>	<u>MINIMUM CHANNELS OPERABLE</u>
1. Containment Pressure	2	1
2. Reactor Coolant Outlet Temperature - T_{HOT} (Wide Range)	2	1
3. Reactor Coolant Inlet Temperature - T_{COLD} (Wide Range)	2	1
4. Reactor Coolant Pressure - Wide Range	2	1
5. Pressurizer Water Level	2	1
6. Steam Line Pressure	2/steam generator	1/steam generator
7. Steam Generator Water Level - Narrow Range	2/steam generator	1/steam generator
8. Refueling Water Storage Tank Water Level	2	1
9. Auxiliary Feedwater Flow Rate	2/steam generator	1/steam generator
10. Reactor Coolant System Subcooling Margin Monitor	1	1
11. PORV Position Indicator*	2/Valve	1/Valve
12. PORV Block Valve Position Indicator**	1 X/Valve	1/Valve
13. Pressurizer Safety Valve Position Indicator	1/Valve	1/Valve
14. Containment Sump Water Level (Wide Range)	2	1

Attachment 2

Discussion and No Significant Hazards Analysis

DISCUSSION AND NO SIGNIFICANT HAZARDS ANALYSIS

The proposed amendment would change the Total Number of Channels for the PORV Block Valve Position Indicator from 2/Valve to 1/Valve.

Each of the three Catawba Pressurizer Power Operated Relief Valves (PORVs) has an associated motor operated block valve. These motor operated block valves are safety related. In accordance with NUREG-0737 Item II.G.1, they are capable of being supplied from either the offsite power source or the emergency power source when offsite power is not available. One channel of safety related position indication is provided for each block valve by means of control room indicating lights associated with the valve control switch. This position indication is not redundant for each valve, but is seismically and environmentally qualified and meets all applicable design and regulatory requirements. A second non-safety indication channel was provided in the design for maintenance and test purposes but was not needed nor intended as accident monitoring instrumentation. Hence, this second channel should be deleted from the Technical Specifications.

10 CFR 50.92 states that a proposed amendment involves no significant hazards considerations if operation in accordance with the proposed amendment would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.

The proposed amendment does not involve an increase in the probability or consequences of any previously evaluated accident. The second channel of PORV Block Valve Position Indication was not taken credit for in the design of the system or in any accident analysis. This second channel is non-safety related and is not relied upon during any accident scenario. Therefore, changing the requirements from 2 indicators per valve to 1 per valve will have no effect on any of the accidents previously analyzed.

The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated. The design and allowed modes of operation of the station will not be affected by changing the total number of PORV Block Valve Position Indicators required by the Technical Specifications. The second channel of position indication is non-safety related and is not relied upon in any of the accident analyses. As such, no new kinds of accidents will be made possible.

The proposed amendment does not involve a significant reduction in a margin of safety. The second channel of PORV Block Valve Position Indication is non-safety related and is not assumed in any accident analysis. Therefore, changing the requirements for the indicators will not significantly effect any margin of safety.

For the above reasons, Duke Power concludes that this proposed amendment does not involve any Significant Hazards Considerations.