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March 17, 1999

U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTENTION: Document Control Desk

Subject: Duke Energy Corporation

Catawba Nuclear Station Units 1 and 2
Docket No. 50-413 and 50-414

Proposed Amendment to the Facility Operating Licenses
(FOL) and Technical Specifications (TS)
TS 3.3.7, Control Room Area Ventilation System (CRAVS)
Actuation Instrumentation
TS 3.3.8, Auxiliary Building Filtered Ventilation Exhaust
System (ABFVES) Actuation Instrumentation
TS 3.7.10, Control Room Area Ventilation System (CRAVS)
TAC Numbers MA4950 and MA4951

Reference: Letter from M. S. Tuckman to NRC, same
subject, dated March 15, 1999

The reference letter transmitted a proposed license amendment to delete TS 3.3.7 and 3.3.8 for the CRAVS and ABFVES Actuation Instrumentation, respectively. As part of this amendment request, Catawba proposed to include a modifying note as part of TS 3.7.10, CRAVS, Required Action A.1. This note would require placing the system in the high chlorine protection mode whenever the automatic transfer to the high chlorine protection mode is inoperable.

Based on further examination of this note within Duke Energy and following discussions with the NRC, it has been determined that the addition of this note is unnecessary. Catawba therefore requests that that portion of the reference letter which proposed the addition of this note to Required Action A.1 of TS 3.7.10 be withdrawn. The revised pages of the Discussion of Changes and Technical Justification and the Environmental Assessment from the reference letter are attached.


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If you have any questions concerning this information, please call
L. J. Rudy at (803) 831-3084.

Very truly yours,



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Attachment

xc: w/attachment

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Description of Changes and Technical Justification

TS 3.3.7 and 3.3.8 govern the CRAVS Actuation Instrumentation and the ABFVES Actuation Instrumentation, respectively. TS 3.3.7, Table 3.3.7-1, CRAVS Actuation Instrumentation, requires two trains of Automatic Actuation Logic and Actuation Relays. TS 3.3.8, Table 3.3.8-1, ABFVES Actuation Instrumentation, also requires two trains of Automatic Actuation Logic and Actuation Relays. These requirements are applicable in Modes 1, 2, 3, and 4. TS 3.3.7 and 3.3.8 each has a set of Surveillance Requirements (SR), which consist of an actuation logic, a master relay test, and a slave relay test. The actuation logic test and the master relay test have a specified frequency of 31 days on a staggered test basis. The slave relay test has a specified frequency of 92 days. As discussed below, these SRs do not apply to the Catawba CRAVS and ABFVES Actuation Instrumentation design. TS 3.7.10 governs the CRAVS itself and TS 3.7.12 governs the ABFVES itself. This LAR requests deletion of TS 3.3.7 and 3.3.8 ~~and adds a note to Required Action A.1 of TS 3.7.10 concerning placing the CRAVS in the high chlorine protection mode if the automatic transfer to the high chlorine protection mode is inoperable.~~

The circumstances surrounding this LAR were discussed with the NRC in a request for enforcement discretion which the NRC granted on March 11, 1999. This LAR is the formal amendment request made in follow up to the request for enforcement discretion.

At Catawba, the CRAVS and ABFVES are actuated by the diesel generator load sequencer, which in turn, is actuated by the Solid State Protection System (SSPS) Automatic Actuation Logic and Actuation Relays. The CRAVS and ABFVES are not directly actuated by the SSPS. Catawba TS 3.3.7 and 3.3.8 were based on the standard version of these TS contained in NUREG-1431, Revision 1, "Standard Technical Specifications, Westinghouse Plants."

The Bases for both NUREG-1431 and the Catawba TS state that the Automatic Actuation Logic and Actuation Relays consist of the same features and operate in the same manner as described for the Safety Injection function. It also states that the specified conditions for the CRAVS and ABFVES portion of these functions are different and less restrictive than those specified for their Safety Injection roles. This Bases discussion is applicable for a plant design that utilizes the SSPS to directly actuate the CRAVS and ABFVES. As indicated above, at Catawba, the CRAVS and ABFVES are actuated by the diesel generator load sequencer, and not directly via the SSPS. Refer to Figure 1 for a simplified depiction of the CRAVS and ABFVES Actuation Instrumentation arrangement.

Catawba has determined that due to the CRAVS and ABFVES Actuation Instrumentation design, that these TS should not have been included in the Improved TS. Catawba is proposing to delete TS 3.3.7 and 3.3.8.

TS 3.3.2, Engineered Safety Feature Actuation System (ESFAS) Instrumentation, contains all the necessary requirements that apply to the Automatic Actuation Logic and Actuation Relays insofar as SSPS testing is concerned. These requirements are found in Table 3.3.2-1, Engineered Safety Feature Actuation System Instrumentation under the Safety Injection function (Function 1b in the table, Automatic Actuation Logic and Actuation Relays). As indicated in the table, an actuation logic test (SR 3.3.2.2), a master relay test (SR 3.3.2.4), and a slave relay test (SR 3.3.2.6) are specified for Function 1b. These SRs test SSPS actuation of the diesel generator load sequencer. As indicated above, at Catawba, the CRAVS and ABFVES are actuated by the load sequencer, and not directly via the SSPS. The automatic start of the CRAVS and ABFVES functions from the load sequencer are performed as part of engineered safeguards testing, which is conducted during refueling outages. SR 3.7.10.3 requires on an 18-month frequency, verification that each CRAVS train actuates on an actual or simulated actuation signal. SR 3.7.12.3 requires on an 18-month frequency, verification that each ABFVES train actuates on an actual or simulated actuation signal. Therefore, deletion of TS 3.3.7 and 3.3.8 is acceptable, as the ESFAS SSPS testing, in combination with engineered safeguards testing, fully tests all functions from the SSPS, through the load sequencer, and to the CRAVS and ABFVES.

Deletion of TS 3.3.7 and 3.3.8 will not have any adverse consequences insofar as high radiation protection and high chlorine protection requirements are concerned. At Catawba, there is no control room automatic isolation function on a high radiation signal. As part of the Improved TS conversion process, operability and testing requirements for the chlorine detectors were relocated from the TS to the Selected Licensee Commitments Manual, which is Chapter 16 of the Updated Final Safety Analysis Report. No changes to any operability or testing requirements pertaining to the chlorine detectors will occur as a result of this LAR. ~~As part of this LAR, it is necessary to add a note to Required Action A.1 of TS 3.7.10 concerning action to take if the automatic transfer to the high chlorine protection mode is inoperable. Addition of this note is necessary to ensure that it applies to Modes 1 through 4. An identical note is already present in Required Action C.1 of TS 3.7.10, which is applicable in Mode 5 or 6, or during movement of irradiated fuel assemblies, or during core alterations. Addition of this note to Required~~

~~Action A.1 will ensure that it applies during all modes and conditions of applicability for TS 3.7.10.~~

Finally, LCOs 3.7.10 and 3.7.12 contain all other necessary requirements for the mechanical portions of the CRAVS and ABFVES, respectively.

In summary, the ESFAS and the CRAVS and ABFVES Actuation Instrumentation will remain fully capable of fulfilling their required safety function, consistent with the manner in which they were designed. No decrease in equipment availability or reliability will be incurred as a result of the approval of this LAR. Approval of this LAR will have no impact from a probabilistic risk standpoint, since there will be no impact on equipment reliability or availability.

Pursuant to 10 CFR 51.22(b), an evaluation of this license amendment request has been performed to determine whether or not it meets the criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) of the regulations.

This amendment to the Catawba TS deletes TS 3.3.7 and 3.3.8 concerning the CRAVS and ABFVES Actuation Instrumentation, respectively, ~~and adds a note regarding chlorine protection to TS 3.7.10 concerning the CRAVS itself.~~

Implementation of this amendment will have no adverse impact upon the Catawba units; neither will it contribute to any additional quantity or type of effluent being available for adverse environmental impact or personnel exposure.

It has been determined there is:

1. No significant hazards consideration.
2. No significant change in the types, or significant increase in the amounts, of any effluents that may be released offsite, and
3. No significant increase in individual or cumulative occupational radiation exposures involved.

Therefore, this amendment to the Catawba TS meets the criteria of 10 CFR 51.22(c)(9) for categorical exclusion from an environmental assessment/impact statement.