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May 4, 1989

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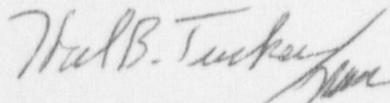
Subject: Catawba Nuclear Station, Units 1 and 2
Docket Nos. 50-413 and 50-414
Technical Specification Amendment
Containment Penetration Conductor
Overcurrent Protective Devices

This letter contains information to supplement my submittal of September 9, 1987 concerning the same subject. The amendment will allow relocation of the table that lists all of the Containment Penetration Conductor Overcurrent Protective Devices from the Technical Specifications to the system description for Electrical Penetration Circuits. The amendment would also modify fuse testing requirements to conform to IEEE standard 242-1975.

As stated in the revised bases pages, the system descriptions for Electrical Penetration Circuits are QA Condition 1 documents. The Analysis of Significant Hazards Considerations has been modified to more clearly state this. The revised Analysis of Significant Hazards Considerations is attached. The changes are noted by a side bar in the right hand margin.

Also, a revision will be necessary to the Table of Contents (Index) showing the deletion of Table 3.8-1. The marked up Index page is attached.

Very truly yours,



Hal B. Tucker

Attachments

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PDR ADOCK 05000413
P PDC

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Mr. W. T. Orders
NRC Resident Inspector
Catawba Nuclear Station

Analysis of Significant Hazards Considerations

As required by 10 CFR 50.91, this analysis provides a determination that the proposed changes to the Technical Specifications do not involve any significant hazards consideration as defined by 10 CFR 50.92.

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 transfer of the tables from the Technical Specifications to a QA Condition 1 document is an administrative matter that does not affect any accident scenario. The Limiting Condition for Operation (LCO) remains in force for the devices as do the surveillance requirements for the circuit breakers to ensure operability. The proposed change to the required fuse testing would still ensure fuse reliability as the proposed program would detect any significant deterioration of fuses. Resistance testing of fuses as presently required is counterproductive as discussed in Attachment 2. Additionally, fuses are, by nature, "fail-safe", thus safety function is assured. As breaker operability is unaffected and fuse safety function is assured, the proposal does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed fuse testing requirements would not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed program is in conformance with IEEE Standard 242-1975 and would detect any significant fuse degradation while preventing the disposal of good fuses. No design or hardware changes are permitted by this change which would affect or create any accident scenarios.

The proposal does not involve or allow any significant design or plant operation changes. Any system modifications must proceed through the modification process and, in accordance with 10 CFR 50.59, must not involve an unreviewed safety question. This process ensures that any change would not create the possibility of a new or different kind of accident from any accident previously evaluated.

The transfer of the tables out of the Technical Specifications is an administrative matter. While future updates to the tables as a result of modifications will not require prior NRC review and approval, Duke is required, under 10 CFR 50.59 to conduct and document a thorough review as previously discussed.

The proposed change would not involve a significant reduction in a margin of safety. The transfer of the tables is an administrative matter as fuse and breaker safety function is fully assured, thus no safety margins are affected. The proposed change in the fuse testing program will maintain safety margins by assuring fuse operability. Any significant degradation of fuses will be detected

Analysis of Significant Hazards Consideration (Cont'd)

by this program while the often counterproductive resistance test is eliminated. The fail-safe nature of fuses provides additional assurance that safety function is fulfilled, thus assuring that margins of safety are maintained.

Based upon the preceding analysis, Duke Power Company concludes that the proposed amendments do not involve any significant hazards considerations.