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U.S. Nuclear Regulatory Commission
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Office of Administration
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Subject: Comments on draft Generic Letter, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized Water Reactors"

Pursuant to Federal Register notice (69 FR 16980), dated March 31, 2004 Duke Energy Corporation (Duke's) submits comments to the Proposed Generic Communication; "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized Water Reactors". Duke's comments are contained in Enclosure I. Duke endorses the comments submitted by the Nuclear Energy Institute.

If you have questions or need additional information, please contact Gregory S. Kent at (704)373-6032.

Very truly yours,

W. R. McCollum, Jr.
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ENCLOSURE

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Enclosure I

Comments by Duke Energy
on
Proposed Generic Communication; "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized Water Reactors".

1. On page 7, second paragraph, delete "...were unable to confirm regulatory compliance implemented" and replace with "chose to implement". The focus of NRC Bulletin 2003-01 was to suggest various interim actions to reduce risk. Actions taken were selected based on actual impact on plant risk.

2. On page 8, first paragraph in "Discussion" section, delete third and fourth sentences. Chemical effects are not considered by industry to be relevant to Pressurized Water Reactors PWRs). This will be confirmed by EPRI/industry test program currently in progress.

3. On page 9, seventh line, "section head" should be "suction head".

4. On page 16, last paragraph, it should be clarified that noncompliance with the Commission's requirements does not imply entry into Technical Specification 3.0.3 (ie, this analysis does not constitute a formal operability evaluation). The provision of appropriate Justification for Continued Operation would be the responsibility of the licensee.

5. On page 18, Item 2.(b), delete "… of the first refueling outage" and replace with " … of the second refueling outage. This will provide resolution to GSI 191 consistent with the Commission's timetable while permitting adequate time for development of any safe and effective plant modifications, for processing of potential Licensing Amendment Requests, and for refueling outage scheduling issues.