

NRCREP Resource

From: Owusu, Tolani E [teowusu@duke-energy.com]
Sent: Monday, June 09, 2008 11:39 AM
To: NRCREP Resource
Subject: Comments on DG 1194, "Guidance to Operators..."
Attachments: DukeComments on DG 1194 Guidance to Operators at the Controls and to srs in the CR of a NP unit.pdf

Attached please find Duke comment on DG-1194, "Guidance to Operators at the Controls and to Senior Operators in the control Room of a Nuclear Power Unit."

<<DukeComments on DG 1194 Guidance to Operators at the Controls and to srs in the CR of a NP unit.pdf>>

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73 FR 18584
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THOMAS P. HARRALL, JR.
Vice President, Plant Support
Nuclear Generation

Duke Energy Corporation
526 South Church Street
Charlotte, NC 28202

Mailing Address:
EC07H / P.O. Box 1006
Charlotte, NC 28201-1006

704 382 3989

704 382 6056 fax

tpharral@duke-energy.com

June 9, 2008

Rulemaking, Directives, and Editing Branch
Office of Administration
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Comments on Draft Regulatory Guide DG-1194, "Guidance to Operators at the Controls and to Senior Operators in the Control Room of a Nuclear Power Unit"

Duke Energy Carolinas, LLC (Duke) provides the attached comment regarding draft Regulatory Guide DG-1194, "Guidance to Operators at the Controls and to Senior Operators in the Control Room of a Nuclear Power Unit" dated April 2008 as published in the *Federal Register* (73 FR 18584) on April 4, 2008.

Duke appreciates the opportunity to provide comments and submits an Attachment to this letter for consideration by the NRC staff.

If you have any questions, please contact R. L. Gill, Jr., at (704) 382-3339.

Sincerely,

A handwritten signature in cursive script that reads 'Thomas P. Harrall, Jr.'.

Thomas P. Harrall, Jr.

Attachments

C. REGULATORY POSITION, Page 4:

- 2.3 The senior operator should have the flexibility to move periodically for a brief time to other parts of the control room, as long as the senior operator is at all times within the control room vital area and meets either of the following conditions.
- a. The senior operator is in sight of or in the audible range of the reactor operator at the controls.
 - b. The senior operator is in the audible range of the control room annunciators.
- 2.4 Administrative procedures should be established that define and outline (preferably with sketches) the specific area within the control room (Section 2.2, above) where the senior operator normally should remain while performing designated duties.

Duke Comments on Draft Regulatory Guide DG-1194

Items (2.3 and 2.4): Duke believes the senior operator maintaining contact with reactor operators in the horseshoe via an open phone line while in a restroom/break area within the control room vital area would be another acceptable alternative.