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SUBJECT: Comment supporting draft reg guide DG-1074, "Steam Generator Tube Integrity." Duke Energy Corp endorses comments transmitted by NEI ltr dtd 990630.

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64 FR 3138  
Jan 20, 1999  
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June 30, 1999

Rules and Directives Branch  
Office of Administration  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

**SUBJECT:** Duke Energy Corporation

Oconee Nuclear Station - Units 1, 2, and 3  
Docket Nos. 50-269, 50-270, and 50-287

McGuire Nuclear Station - Units 1 and 2  
Docket Nos. 50-369 and 50-370

Catawba Nuclear Station - Units 1 and 2  
Docket Nos. 50-413 and 50-414

Response to Draft Regulatory Guide DG-1074, "Steam  
Generator Tube Integrity"

This letter transmits Duke Energy Corporation's comments on Draft Regulatory Guide DG-1074. Duke Energy's comments on DG-1074 are based on the fact that DG-1074 does not reflect the current state of the industry/NRC discussion on NEI 97-06 and its supporting generic license change package and it is also too prescriptive. The NRC has recognized this joint effort as the best path to a successful resolution of steam generator program issues. Duke Energy Corporation supports this joint effort. As previously stated in my letter of February 24, 1998, Duke Energy Corporation has implemented the requirements of NEI 97-06 as of the first refueling outage that occurred after January 1, 1999, in accordance with the industry initiative.

Duke Energy Corporation endorses the comments transmitted by NEI letter dated June 30, 1999, Subject: "Transmittal of Industry Comments on Draft Regulatory Guide DG-1074."

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PDR REGGD.  
XX.XXX C PDR

Rules and Directives Branch  
U. S. Nuclear Regulatory Commission  
June 30, 1999  
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Duke Energy Corporation has no other specific comments on Draft  
Regulatory Guide DG-1074.

Inquiries regarding this letter should be directed to J.S.  
Warren at telephone (704) 382-4986.

Very truly yours,

A handwritten signature in cursive script, appearing to read "M. S. Tuckman". The signature is written in dark ink and is positioned above the typed name.

M. S. Tuckman