

MAY 11 1982



DISTRIBUTION:

- Docket File
- NRC PDR
- Local PDR
- ORB #4 Rdg
- DEisenhut
- OELD
- OI&E (1)
- PCWagner
- RIngram
- NSIC
- ACRS (10)
- JHeltemes
- Gray File

W. Gammill
W. Haass

Dockets Nos. 50-269/270/287

Mr. L. C. Dail
 Vice President - Design Engineering
 Duke Power Company
 P. O. Box 33189
 422 South Church Street
 Charlotte, North Carolina 28242

Dear Mr. Dail:

I have discussed your March 29, 1982 letter to me with members of the Office of Nuclear Reactor Regulation (NRR) staff and have determined that a formal response to the acceptability, on a generic basis, of your proposal is within the purview of the Office of Nuclear Regulatory Research (RES) rather than NRR. I have, therefore, forwarded your letter to the Division of Engineering Technology, RES, for response.

The Division of Licensing, NRR, plans no further action on your March 29, 1982 request, but would review a plant specific proposal related to any of the nuclear plants licensed, or being constructed, by Duke Power Company. Such a request should be docketed through your normal licensing process and contain sufficient bases for the staff to make an evaluation of its acceptability. In addition, there appears to be a misinterpretation of the agreements reached during our staff's February 9, 1982 meeting and subsequent March 1, 1982 telephone conferences for which the following clarification is provided:

Item 1

The ALARA concept is used to assess the economic feasibility of augmented waste treatment equipment or systems based on expected reduction in off-site collective dose during normal operation and estimated cost of the equipment (\$1000 per man-rem). It has not been used in the evaluation of structural design nor in the consideration of accident consequences.

Item 2

As specified in our Standard Review Plan, Section 15.7.3, credit for liquid retention by unlined building foundations will not be given regardless of the building seismic category because of the potential for cracks. However, we limit our assumption to the loss of the contents of a single tank rather than the total liquid contents of the building.

8205200331 820511
 PDR AD0CK 05000269
 P PDR

OFFICE ▶
SURNAME ▶
DATE ▶

Item 5

The staff addressed the need for a graded QA program which takes into consideration the relative importance to safety of each aspect of facility design. This seemed to be consistent with Duke's application of an ALARA concept with respect to QA. However, at no time did we agree that this "excludes all portions of the structure, including the seismically designed 'bathtub',....".

If you have any questions on this matter, please contact the NRC's Project Manager for Oconee - P. C. Wagner at (301) 492-8213.

Sincerely,

Original signed by

Thomas M. Novak, Assistant Director
for Operating Reactors
Division of Licensing

cc: See next page

*OK for J... 5/16/82
for witness WPH 5/14/82*

OFFICE ▶	DL:ORB#4	DL:ORB#4	DL:ORB#4			
SURNAME ▶	PCWagner:ms	JFS	TMNovak			
DATE ▶	5/10/82	5/10/82	5/10/82			

Duke Power Company

cc w/enclosure(s):

Mr. William L. Porter
Duke Power Company
P. O. Box 33189
422 South Church Street
Charlotte, North Carolina 28242

Office of Intergovernmental Relations
116 West Jones Street
Raleigh, North Carolina 27603

Oconee County Library
501 West Southbroad Street
Walhalla, South Carolina 29691

Honorable James M. Phinney
County Supervisor of Oconee County
Walhalla, South Carolina 29621

Mr. James P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission, Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Mr. William O. Parker, Jr.
Vice President - Steam Production
Duke Power Company
P. O. Box 33189
422 South Church Street
Charlotte, North Carolina 28242

Regional Radiation Representative
EPA Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30308

William T. Orders
Senior Resident Inspector
U.S. Nuclear Regulatory Commission
Route 2, Box 610
Seneca, South Carolina 29678

Mr. Robert B. Borsum
Babcock & Wilcox
Nuclear Power Generation Division
Suite 220, 7910 Woodmont Avenue
Bethesda, Maryland 20814

Manager, LIS
NUS Corporation
2536 Countryside Boulevard
Clearwater, Florida 33515

J. Michael McGarry, III, Esq.
DeBevoise & Liberman
1200 17th Street, N.W.
Washington, D. C. 20036