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 50-269 Oconee Nuclear Station, Unit 1, Duke Power Co. 05000269
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 50-369 William B. McGuire Nuclear Station, Unit 1, Duke Powe 05000369
 50-370 William B. McGuire Nuclear Station, Unit 2, Duke Powe 05000370

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 PARKER, W.O. Duke Power Co.
 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Responds to 820615 Generic Ltr 82-12 re control of employee working hours. Tech Specs should be reserved for items w/ significant safety potential.

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DUKE POWER COMPANY

POWER BUILDING

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WILLIAM O. PARKER, JR.
VICE PRESIDENT
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July 23, 1982

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373-4083

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Subject: Oconee Nuclear Station
McGuire Nuclear Station
Docket Nos. 50-269, -270, -287, -369, -370

Dear Sir:

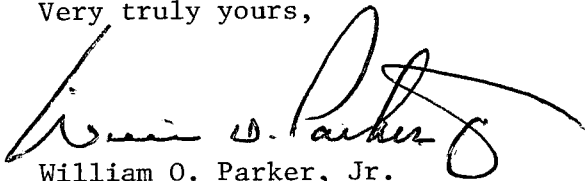
By letter dated June 15, 1982, the NRC distributed Generic Letter 82-12 which concerns nuclear power plant staff working hours. Duke Power Company strongly objects to the proposed action specified with respect to its being included in Technical Specifications.

Duke strongly supports the overall thrust of controlling the working hours of employees here to the extent of preventing a compromise of safety. This is generally true throughout the industry and it is particularly addressed in the soon to be released ANS 3.2 standard on administrative controls and quality assurance. This will have a section on human factors which will speak to control of working hours of those that perform safety related functions. More detail is given in respect to Operators in that they are required to spend time on the control board and certainly this is an area that should not be compromised. The standard itself does require that supervision review the work to be done and the physical condition of the employees to perform such work safely.

Our real concern is in respect to the proposed request to revise Technical Specifications to require the restrictions as specified. Technical Specifications should be reserved for those items which have significant safety potential associated with them.

The NRC should support ANS 3.2 rather than take actions as proposed in the generic letter.

Very truly yours,



William O. Parker, Jr.

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Mr. Harold R. Denton, Director
July 23, 1982
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cc: Mr. James P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

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

Mr. Philip C. Wagner
Office of Nuclear Reactor Regulation
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