

REGULATORY INFORMATION DISTRIBUTION SYSTEM

DOCKET NBR: OCONEE 1/2/3 MCGUIRE 1/2
50-269/270/287/369/370
 RECIPIENT: DENTON, H. R.
 ORIGINATOR: PARKER, W. D.
 COMPANY: DUKE PWR
 SUBJECT:

DOC DATE: 781026
 ACCESSION NBR: 7811010104
 COPIES RECEIVED:
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 SIZE: 2

Requests rapid NRC approval of standby Shutdown Sys concept pro-
posed re station security & fire protection of subj facil. Must
have NRC assurance that SSS concept meets NRC requirements before
committing to these mods.

DISTRIBUTION CODE: A006

DISTRIBUTION TITLE: FIRE PROTECTION INFORMATION (AFTER ISSUANCE OF DL).

NOTARIZED _____

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QAB	W/ENCL		
POWER SYS BR	W/ENCL		

NOTES: M CUNNINGHAM-ALL AMDTS TO FSAR & CHANGES TO TECH SPECS

OPERATOR LIC BR W/ENCL

NOV 2 1978

TTTAY
CCP

DUKE POWER COMPANY

POWER BUILDING

422 SOUTH CHURCH STREET, CHARLOTTE, N. C. 28242

WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

October 26, 1978

TELEPHONE: AREA 704
373-4083

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

REGULATORY DOCKET FILE COPY

Reference: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287

McGuire Nuclear Station
Docket Nos. 50-369, -370

Dear Mr. Denton:

On January 18, 1978, representatives of Duke Power Company made a presentation to members of your staff on a Standby Shutdown System proposed by Duke to address NRC regulations and concerns with regard to station security and fire protection at Oconee Nuclear Station. At this meeting it was indicated that Duke needed agreement on the Standby Shutdown System concept. Duke representatives stated that the detailed design, construction, and procurement for the system, which involves a significant commitment in terms of manpower and money, could not begin until receipt of a formal indication that the NRC agrees with the Standby Shutdown System concept.

On February 1, 1978, Duke Power Company submitted a description of the Standby Shutdown System. In that letter it was stated, "Implementation of the system will be subsequent to a satisfactory review by the staff, your prompt attention to this matter is requested." Since that time various submittals on other, specific topics have referenced this description and the relationship between the Standby Shutdown System and the specific issues involved.

On March 23, 1978, representatives of Duke Power Company met with the NRC staff and presented a proposed Standby Shutdown System for McGuire Nuclear Station. In that meeting and in the system description submitted to the Commission on May 1, 1978, it was indicated that the resolution of the issues of station security and fire protection was dependent upon the Standby Shutdown System concept and that implementation of the system would be subsequent to a satisfactory review by the Commission. Since that time submittals have referenced the addition of the Standby Shutdown System as a method for meeting various criteria associated with station security and fire protection.

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Mr. Harold R. Denton, Director
October 26, 1978
Page Two

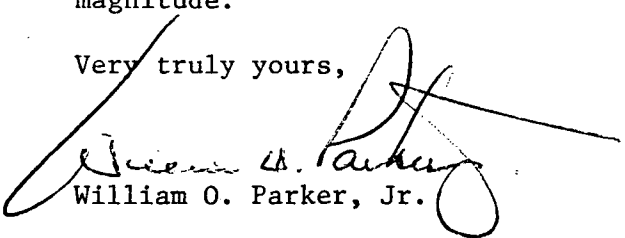
It was stated in the Commission's summary of the meeting held on January 18, 1978 to discuss the proposed Standby Shutdown System for Oconee that, "Preliminary reaction by the staff to this proposed concept was favorable." Conversations with the NRC staff reviewers for both security and fire protection have indicated that the Standby Shutdown System concept will meet the NRC criteria with minor modifications. Interim fire protection and security measures, for the period before SSS installation, have also been received favorably by the staff.

It is our opinion that the Standby Shutdown System concept and the proposed interim measures have been refined to the point where NRC regulations in the area of both security and fire protection have been adequately addressed. However, it is evident that NRC reports which use the SSS concept to address the issues of fire protection and security do not, in themselves, constitute approval of the SSS proposal. The SSS is "approved" as a component of a particular program, i.e. the security program or the fire protection program, but no assurances are offered, particularly in the case of McGuire Nuclear Station, that future NRC interpretations of the regulations will not require protection of the other systems where the SSS provides the equivalent function.

Due to this indecision, our position has become precarious in that crucial decisions involving the allotment of manpower and ordering of particular pieces of equipment must be made in order to meet the installation times previously given to the NRC for the SSS. It is apparent to us that lengthening of the period before SSS installation will cause operational hardships due to the extent of interim measures. It is our belief that it is in the best interest of both Duke Power Company and the Commission to approve the SSS concept as quickly as possible since the SSS concept in our opinion is the best way to comply with NRC regulations on these dockets.

We therefore request the Commission to approve the SSS concept as soon as possible in order for Duke Power Company to fully meet NRC regulations. It is felt that Duke Power Company must have the NRC's assurance that the SSS concept will meet the NRC requirements in these areas before we can commit to modifications of this magnitude.

Very truly yours,


William O. Parker, Jr.

LJB:scs

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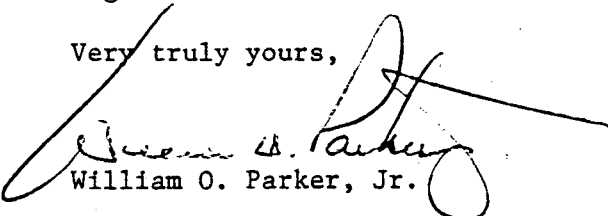
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