

Central File

DUKE POWER COMPANY

POWER BUILDING

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

USING REGION II
ATLANTA, GEORGIA

OCT 22 9:49

WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

October 20, 1980

TELEPHONE: AREA 704
373-4083

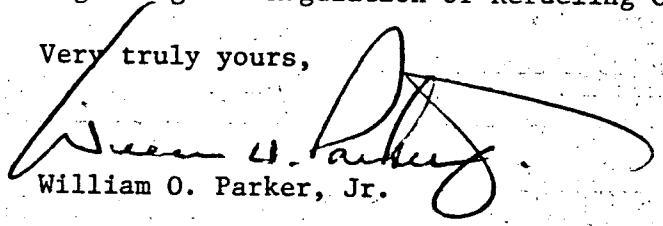
Mr. James P. O'Reilly, Director
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Re: NRC/OIE Circular 80-21
Oconee Nuclear Station
Docket Nos. 50-269, -270, -287

Dear Mr. O'Reilly:

Based upon careful review of IE Circular No. 80-21 by the appropriate personnel, Duke Power Company is in disagreement with the NRC interpretation of "directly supervised" refueling operations. Duke Power Company's position is that a SRO can more effectively supervise refueling activities from the Refueling Operations Center in the Control Room than from the refueling deck in the Reactor Building. Please find the attached response regarding the Regulation of Refueling Crews.

Very truly yours,


William O. Parker, Jr.

JLJ:scs
Attachment

OFFICIAL COPY

8011130068

NRC/OIE CIRCULAR NO. 80-21 RESPONSE:
(REGULATION OF REFUELING CREWS)

Oconee Nuclear Station core alterations are directly supervised by a Licensed Senior Reactor Operator, who has no other concurrent responsibilities. Contrary to the interpretation of IE Circular No. 80-21 where "directly supervised" means that the SRO is supervising from the refueling deck in the Reactor Building, Oconee SRO's direct refueling activities from the Refueling Operations Center located in the Control Room. The Refueling Operations Center provides a location where the "Refueling SRO" observes core reactivity monitors and centralizes communications between the refueling crews in the Reactor Building and in the Spent Fuel Pool Area and the Operators in the Control Room. Being situated in the Control Room and being in direct communication with the Refueling Crews, places the SRO in a better position to evaluate situations and solve problems which may develop during the fuel movement operations. Should evacuation of the Reactor Building or Spent Fuel Pool Area become necessary, the "Refueling SRO" is better prepared in the Refueling Operations Center to direct evacuation and initiate emergency procedures. By maintaining this "big picture" view of the entire refueling scheme from the Refueling Operations Center, the "Refueling SRO" can ensure fuel movement will be conducted efficiently and safely.

Having the "Refueling SRO" stationed in the Reactor Building would limit the ability of the SRO to effectively supervise fuel movement. This would be especially true during shift turnover and relief situations. The "Refueling SRO" turnover conducted in the Control Room presents less opportunity for confusion and error to be introduced - fuel movement can progress practically without interruption.

The Refueling Crew in the Refueling Operations Center consists of at least one licensed RO along with the "Refueling SRO." The Refueling Crew in the Reactor Building consists of at least one licensed RO on the Refueling Deck and one qualified unlicensed individual. The RO directs core alterations under supervision of the "Refueling SRO." The Refueling Crew in the Spent Fuel Pool area consists of at least two qualified unlicensed individuals who move fuel under supervision of the "Refueling SRO."

All personnel participating directly in the core alterations meet all necessary qualifications and training requirements. The refueling program and procedures established at Oconee Nuclear Station ensure refueling activities are conducted safely and within NRC requirements.