

**DUKE POWER COMPANY**

**ELECTRIC CENTER, BOX 33189, CHARLOTTE, N. C. 28242**

L. C. DAIL  
VICE PRESIDENT,  
DESIGN ENGINEERING

DOCKET NUMBER  
PROPOSED RULE *FP-811-4*



November 30, 1979

Secretary of the Commission  
U. S. Nuclear Regulatory Commission  
Washington, D. C.

Attention: Docketing and Services Branch

*D-1*

Subject: Proposed Regulatory Guide  
Comments  
Duke File: A-12.16-2

*FP-811-4*

Dear Sir:

Attached are comments from our engineering staff concerning the proposed Regulatory Guide entitled "Safety-Related Permanent Dewatering Systems for Nuclear Power Plants."

Very truly yours,

L. C. Dail, Vice-President  
Design Engineering Department

EKM/sr

Attachment

Acknowledged by card.....*12/21/79*

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COMMENTS OF DRAFT REGULATORY GUIDE  
Entitled "Safety-Related Permanent  
Dewatering Systems for Nuclear Power Plants"

Note: The numbers on the comments below correspond to the paragraph numbers contained in the proposed Regulatory Guide.

B. 2. Operational Monitoring Requirements

Add the following:

Potential for radioactive releases should be considered in the conceptual design of the Permanent Dewatering Systems. Any groundwater drainage sumps should be located to preclude radioactive contamination from pipe breaks, overflows, etc., if at all possible; otherwise, monitoring should be provided.

B. 3. Pipe Breaks

Add the following:

Groundwater drainage sumps for the radioactive areas of the plant should be located either outside the building or designed to block the flow from radioactive pipe breaks, tank overflows, etc.

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