

DUKE POWER COMPANY

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L. C. DAIL
VICE PRESIDENT
DESIGN ENGINEERING

COPIES

PROPOSED

PR - *Misc. Future
Reg. Guide*

D-1

RS-908-5



December 20, 1979

Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Docketing and Services Branch

Subject: Proposed Revision 2 to Regulatory Guide 1.94
Comments
Duke File: A-12.16-1

Dear Sir:

Attached are comments from our engineering staff concerning the proposed Revision 2 to Regulatory Guide 1.94. We realize the deadline for comments has past; but we feel these comments are of particular importance and we request that they receive your consideration.

Very truly yours,

L. C. Dail

L. C. Dail, Vice-President
Design Engineering

EKM/fch

Attachment

Acknowledged by card *12/31*

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COMMENTS ON PROPOSED REVISION 2 TO
REGULATORY GUIDE 1.94, ENTITLED
"QUALITY ASSURANCE REQUIREMENTS FOR INSTALLATION,
INSPECTION, AND TESTING OF STRUCTURAL CONCRETE,
STRUCTURAL STEEL, SOILS AND FOUNDATIONS DURING
CONSTRUCTION PHASE OF NUCLEAR POWER PLANTS."

Comments concerning the above proposed revision to Regulatory Guide 1.94 are listed below:

- 1) In Table B of ANSI N45.2.5-1978, in-process testing of soils for field density is required at a minimum of every 10,000 square feet. Duke's engineering staff believes that this represents an excessive amount of testing and an inappropriate basis on which to specify field density testing. Testing should be specified on a volume basis and an appropriate minimum frequency is at least one test for every 2000 to 2500 cubic yards placed. It is therefore recommended that the regulatory position be revised to take this exception to the requirements of ANSI N45.2.5-1978.
- 2) In the opening paragraph under Part C, Regulatory Position, reference is made to Section III, Division 2 of the ASME Boiler and Pressure Vessel Code which implies that its requirements and guidelines are to be treated as acceptable to the NRC staff and are only supplemented by the provisions of ANSI N45.2.5-1978. Since Section III, Division 2 covers only the requirements for concrete reactor vessels and containments, it is an inappropriate general reference as used. The phrase "not covered by Section III, Division 2 of the ASME Boiler and Pressure Vessel Code²" and footnote 2 should be deleted.