



DUKE POWER

November 1, 1989

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Subject: Catawba Nuclear Station
Docket Nos. 50-413 and 50-414

Dear Sir:

In response to GL 88-20 and Supplement, Duke Power Company is providing herein the proposed program for completing the IPE for Catawba Nuclear Station.

In July 1984, Duke initiated a program to conduct a full scale PRA of Catawba Unit 1. This PRA, a Level 3 with external events, was completed in August 1987. For satisfying the IPE requirement, Duke intends to utilize this Catawba PRA.

The Catawba PRA was planned, managed, and carried out entirely with Duke personnel. The overall methodology is consistent with the PRA Procedures Guide, NUREG-2300. The human interaction assessment employed the EPRI sponsored SHARP methodology. The in-plant consequence analysis, consisting of accident progression is based on the MAAP computer code (MAAP 3.0B). Finally, the CRAC2 computer code was utilized to perform the ex-plant consequence analysis.

Although a copy of the Catawba PRA is currently available, a few additional tasks remain to be completed for the IPE applications. These tasks and their schedules as presently envisioned, considering the ongoing work on Oconee and McGuire PRA, are as follows:

| | |
|---------------------------------------|-------|
| Assess Impact Of Plant Modifications | 4/90 |
| Assess Unit 2 Differences | 12/90 |
| A-45 Evaluation and USI/GSI Screening | 3/91 |
| Examination of Results | 7/91 |
| Submittal of IPE Package to NRC | 12/91 |

Nearly all the information the NRC is seeking in the IPE submittal is contained in the completed Catawba PRA document. Accordingly, our submittal package will include a copy of the Catawba PRA, a "road-map" for the requested information within the PRA, a discussion of the evaluation of A-45 and other USIs/GSIs, a summary of Duke actions in response to the PRA results, and a discussion of conformance to GL 88-20.

*Adol
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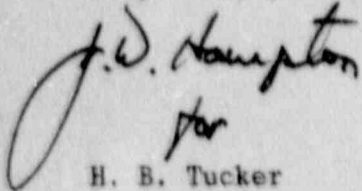
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Since our IPE methodology is PRA methodology and since our PRA documents are nearly completed, restructuring the PRA reports in the order suggested by the IPE submittal guidance would require additional resources and paperwork and is not warranted. Our submittal package contains all the information NRC is seeking.

We trust that the NRC finds the program outlined above will satisfy the intent and spirit of the IPE letter.

Very truly yours,



J. W. Hampton
for

H. B. Tucker

RGM.1/lcs

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