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DUKE POWER

November 9, 1989

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

Subject: NRC Public Meeting Regarding Generic Letter 89-13, Service Water System Problems Affecting Safety Related Equipment

Duke personnel plan to attend the subject meeting scheduled for November 30, 1989 in Atlanta, GA. that was announced in the October 23, 1989 Federal Register (Vol. 54, No. 203, page 43209). As requested, I have attached a list of questions that we request your staff to address during the meeting.

If you have any questions, please contact S.E. LeRoy at (704) 373-6233.

Very truly yours,

Hal B. Tucker

Attachment

SEL478

xc: Mr. K.N. Jabbour, Project Manager
U.S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Washington, D.C. 20555

Handwritten notes: 413, 414, 269, 370, 369, 370

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U.S. Nuclear Regulatory Commission
Document Control Desk
November 10, 1989

Duke Power Company
Questions for the November 30, 1989 NRC Meeting Regarding
Generic Letter 89-13, Service Water System Problems

Question No. 1

Enclosure 1 to Generic Letter 89-13 describes an acceptable program, to the NRC, to implement Recommendation No. I of the Generic Letter. This program includes biocide treatment regardless of whether the plant is susceptible to macroscopic biological fouling or not. Will a program that does not include biocide treatment be acceptable to the NRC ?

Question No. 2

Recommendation I of Generic Letter 89-13 states that, "initial activities should be completed before plant start-up following the first refueling outage beginning nine months or more after the date of this letter". What is the intent of the phrase, "initial activities" ? Does it mean:

- 1) The first "round" of activities (inspections, flushes, biocide treatment, etc) has been completed; or,
- 2) The mechanisms have been put in place which will culminate in the implementation of the program, (biocide discharge permits submitted, procedures written and approved) ?

Question No. 3

Recommendation III states, "Ensure by establishing a routine inspection and maintenance program...that corrosion, erosion... cannot degrade the performance of the safety related systems supplied by service water" (emphasis added). It would seem unrealistic to assume that a program could be developed that will ensure absolutely no degradation of the system. Could you clarify that the intent here is to establish a program which will ensure that the system cannot degrade to the point at which its ability to perform its safety function is impaired ?

Question No. 4

Generic Letter 89-13 provides the licensee with a great deal of leeway in defining their programs. This leeway is desirable and justifiable given the wide variation in conditions that may prevail. It is anticipated that the main mechanism for judging compliance with the generic letter will be NRC site inspections. During such inspections, what will be the basis for judging the acceptability of the program ? What is being done to promote consistency in interpretations among regions ?

Question No. 5

Similar regional meetings regarding Generic Letter 89-04 were conducted in the June 1989, time frame. To date, the minutes from these meetings have not been received. When can we expect the minutes from the Generic Letter 89-13 meetings ?