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DUKE POWER

September 25, 1989

Commissioner Kenneth M. Carr
Nuclear Regulatory Commission
One White Flint North, OCM/KC
11555 Rockville Pike
Rockville, Maryland 20852

Dear Chairman Carr,

Recent Commission deliberations have been directed at allocation of NRC resources to review applications for plant certification under 10CFR52. I understand that you held a briefing on September 20, 1989. I would like to share Duke's views on this subject with you.

I strongly support the EPRI ALWR Requirements Document Program and the companion Vendor ALWR Certification Program. This combination; i.e., utility requirements and vendor certification, form the needed foundation for nuclear revitalization.

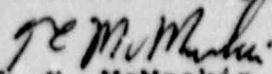
Evolutionary ALWRs should receive priority as they are the only viable near term option, and they can provide a bridge of confidence with the new regulations that utilities may need before placing orders for passively safe designs. We should not close the door on the evolutionary ALWR, our only possible near term nuclear option. Indeed, the evolutionary ALWR would provide improved safety margin over current designs, employs the best features of our substantial experience base, and is soundly based on proven technology. Many of the problems with the current generation of nuclear plants came from trying to achieve public acceptance through continuous modification of the technology, seeking perfection. The resulting instability and lack of predictable schedules and costs combined with reduced growth in electric demand to precipitate cancellations and halt new orders. Standardization and licensing reform are critical elements in providing the stability and predictability necessary to restore the nuclear option. Aside from whether an evolutionary ALWR is actually built, passive and other advanced designs cannot reasonably proceed if the licensing reform is not proven workable on an evolutionary design. Much would be gained from the certification of evolutionary ALWRs and could be directly applied to passively safe designs as they are developed.

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PDR COMMS NRCC
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September 25, 1989

Page 2

The passively safe designs hold great promise, but utilities do not yet have needed confidence in passive technology nor that licensing reform will result in needed stability. Our large experience base with light water reactors provides that technology confidence in the evolutionary ALWR. As such, the evolutionary ALWR is the logical near term choice to achieve standardized design and demonstrate the new licensing process. The evolutionary ALWR should receive first priority for certification in the near term. Both industry and regulators have made investments in the ALWR program. Vacillation at this time indicates uncertainty, instability and unpredictability, a sign that we may not be ready to renew the nuclear option with the evolutionary ALWR, passively safe ALWR, HTGR, or any other advanced designs.


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CC: Commissioners
EPRI ALWR Steering Committee
J. J. Taylor
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