

DUKE POWER COMPANY

POWER BUILDING

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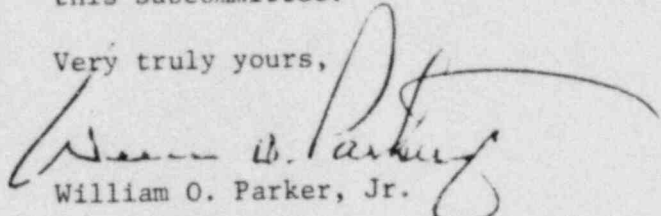
July 3, 1980

Mr. Gary Young
U. S. Nuclear Regulatory Commission
Mail Stop H-1016
Washington, D. C. 20555

Dear Mr. Young:

Reference the Volume 45, Federal Register 42431, June 24, 1980 notice of the Advisory Committee on Reactor Safeguards, Subcommittee on Fire Protection Meeting scheduled for July 9, 1980. On June 30, 1980, we provided comments on the proposed fire protection rule to the Secretary, U. S. Nuclear Regulatory Commission. Please find attached a copy of these comments which we are submitting for consideration of this subcommittee.

Very truly yours,


William O. Parker, Jr.

JRH:vr

Attachment

ATTACHMENT D

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DUKE POWER COMPANY

LEGAL DEPARTMENT

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WILLIAM LARRY PORTER
ASSOCIATE GENERAL COUNSEL

June 30, 1980

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

Attention: Docketing and Service Branch

Re: Fire Protection Program For Nuclear Power Plants
Operating Prior to January 1, 1979
45 Federal Register 36082, May 29, 1980

Dear Mr. Secretary:

On May 29, 1980, the Nuclear Regulatory Commission published for public comment proposed regulations which would impose "certain minimum provisions for fire protection in operating nuclear power plants." Duke Power Company, a utility operating in North Carolina and South Carolina, generates more than 25% of its electricity by nuclear power. This nuclear base load generation by Oconee Nuclear Station (Oconee) could be severely impacted by the proposed rule. The cost of implementation of this rule will be substantial in terms of hardware costs as well as the cost of purchasing replacement power while units are shut down to implement the requirements.

Duke Power Company (Duke) has divided its comments into General Comments and Specific Comments. Duke believes that the proposed regulations are deficient in the following:

General Comments

(a) The NRC Staff (Staff) has violated Duke because of the later described

DUPLICATE DOCUMENT

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