

Control File

DUKE POWER COMPANY

POWER BUILDING

422 SOUTH CHURCH STREET, CHARLOTTE, N. C. 28242

WILLIAM O. PARKER, JR.
VICE PRESIDENT
STEAM PRODUCTION

November 3, 1980

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TELEPHONE AREA 704
373-4083

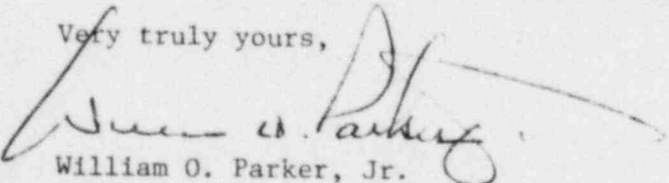
Mr. James P. O'Reilly, Director
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Re: McGuire Nuclear Station
Docket Nos. 50-369, -370
Catawba Nuclear Station
Docket Nos. 50-413, -414
IE Circular 80-21

Dear Mr. O'Reilly:

My letter of October 20, 1980, discussed, on the Oconee Nuclear Station docket, Duke Power Company's disagreement with the NRC interpretation of "directly supervised" refueling operations transmitted in IE Circular 80-21. This letter is to clarify that the position indicated in my October 20, 1980 letter will also be utilized at McGuire Nuclear Station and Catawba Nuclear Station. Our position is as follows. The NRC interpretation places too great a restriction on the supervising SRO. The supervising SRO should have the freedom to determine the location, i.e. operating deck, fuel building, control room which most requires his presence. In light of the training and qualifications of operators involved in the movement of fuel, and the detailed refueling program and procedures established, it is felt that an SRO can more effectively supervise refueling activities if he has this freedom.

Very truly yours,


William O. Parker, Jr.

LJB:scs
Attachment

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