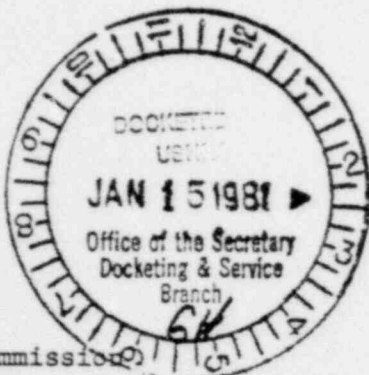


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VICE PRESIDENT
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January 12, 1981

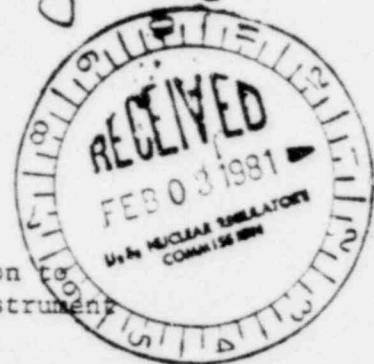


INDEX NUMBER PR *misc notice*
PROPOSED RULE Reg Guide

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

Attention: Docketing and Service Branch

Subject: U. S. Nuclear Regulatory Commission Proposed Revision to
Regulatory Guide 1.80 "Preoperational Testing of Instrument
and Control Air Systems"
Duke Power Company Comments



Mr. Secretary:

Duke Power Company submits the following comments on the proposed revision to Regulatory Guide 1.80.

Regulatory Position 8 states that "the tests should verify the adequacy of design requirements and accident analysis assumptions relating to system pressures at which supplied loads change state." This requirement is not addressed in the value/impact part of the draft. The value of this position is minimal relative to the extensive and expensive instrumentation which would be required if this series of tests is applied to each safety related component. This time and cost impact is not justified by significant test results. The existing loss-of-air test provides adequate information regarding the operability of the instrument air system.

William O. Parker, Jr.
William O. Parker, Jr.

SAG:bj



Acknowledged by card... *1/15/81*

Typical comments

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