

**DUKE POWER COMPANY**

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HAL B. TUCKER  
VICE PRESIDENT  
NUCLEAR PRODUCTION

July 13, 1984

TELEPHONE  
(704) 373-4531

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Re: Catawba Nuclear Station, Unit 1  
Docket No. 50-413

Subject: Applicants' Application for Partial  
Exemption from GDC 64

Dear Mr. Denton:

Pursuant to 10 CFR §50.12, Duke Power Company, et al. (Applicants) hereby request an exemption from the requirement of 10 CFR Part 50, Appendix A, General Design Criterion (GDC) 64, as such relates to fuel load and pre-critical testing activities.

In a July 2, 1984 letter to Mr. James P. O'Reilly Applicants noted that the process tubing for the following radiation monitors would have to be modified in order to achieve design flow rates:

- EMF 38 - Containment Air Particulate Monitor
- EMF 39 - Containment Gas Monitor
- EMF 40 - Containment Iodine Monitor

Subsequent analysis and testing of EMF 39 has confirmed that this monitor will accomplish its design function and is considered operable. The modification previously identified will be implemented prior to Mode 4 entry to enhance operation of this monitor.

Modifications to EMF 38 and EMF 40 will also be implemented prior to entering Mode 4. This will ensure that EMF 38 will comply with the requirements of the proposed Technical Specifications, i.e., that the monitor be operable for Mode 4 and above. These particular monitors serve to monitor the levels of airborne activity in the containment to determine the magnitude of reactor coolant leakage, evaluate Containment entry requirements and analyze activity released to the environment by the Containment Purge System. As discussed in previous exemption requests, there will be no fission product inventory in the cone during this time period. Therefore, there would be no airborne activity in the Containment that would require the monitors to be operable. Based on this analysis, it is Applicant's position that the proposed mode of operation would be as safe as that were the Applicant to fully comply with the regulations at the time of license issuance.

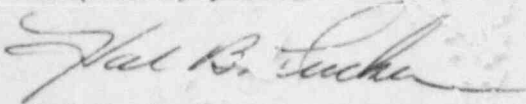
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By letters dated June 20 and June 28, 1984 Applicants requested a partial exemption from GDC 17 in order to permit the diesel generators for Unit 1 to be inoperable until initial criticality. It is considered that the information regarding exigent circumstances supporting that request also encompass the situation presented in this application. Therefore, Applicants hereby request that the Commission issue an exemption to GDC 64 that would allow the above referenced items to be completed prior to Mode 4 entry.

Very truly yours,



Hal B. Tucker

NaR:slb

cc: Mr. J. P. O'Reilly, Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323

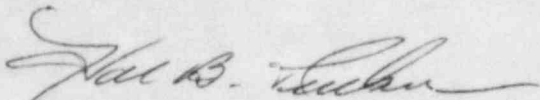
Mr. Jesse L. Riley  
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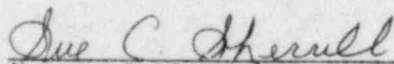
MCR Resident Inspector - Catawba

HAL B. Tucker, being duly sworn, states that he is Vice President of Duke Power Company; that he is authorized on the part of said Company to sign and file with the Nuclear Regulatory Commission this application; and that all statements and matters set forth therein are true and correct to the best of his knowledge.



Hal B. Tucker, Vice President

Subscribed and sworn to before me this 13th day of July, 1984.



Notary Public

My Commission Expires:

September 20, 1984