

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 41, GDC 60, and
GDC 61

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 Criteria (GDC) 41, 60 and 61, 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 following filter systems would not be loaded and tested at the time of fuel loading:

- a. Auxiliary Building Ventilation Exhaust Filters
(ECCS Pump Room Exhaust)
- b. Annulus Ventilation Exhaust Filters
- c. Spent Fuel Pool Exhaust Filters
- d. Containment Purge and Incore Instrumentation Purge Exhaust Filters
- e. Containment Air Release Filters
- f. Technical Support Center Supply Filters

As previously discussed, the filter systems (a) thru (d) will be loaded and tested prior to placing each in service in accordance with the limiting conditions for operation in the proposed Technical Specifications. In any case, these filters will all be operable prior to initial criticality. Filter systems (e) and (f) will also be operable prior to initial criticality.

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Filter systems (a), (b) and (f) are installed to reduce the environmental impact from loss of coolant accidents and other accidents that could affect the habitability of the Technical Support Center. During fuel loading and pre-critical testing there will be no fission product inventory in the core, and thus no potential for environmental consequences as a result of design basis accidents.

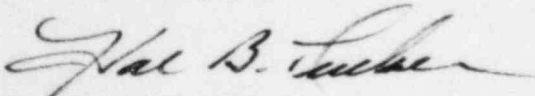
Filter system (c) is designed to protect against spent fuel handling accidents in the spent fuel pool area. In that no spent fuel will be stored during this time period this system will not be required to protect against the design basis accident.

Filter systems (d) and (e) are designed to reduce the environmental impact of normal releases from the containment. As discussed above, there will be no fission product inventory in the core during this period. Therefore, there would be no airborne radioactivity in the containment that would require these systems to be placed in service.

Based on the above analyses, 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.

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 41, GDC 60 and GDC 61 that would allow the above referenced items to be completed prior to initial criticality.

Very truly yours,



Hal B. Tucker

NAR:scs
Attachments

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

Robert Guild, Esq.
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NRC 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

Hal B. Tucker, Vice President

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

Aue C. Sherrill

Notary Public

My Commission Expires:

Sept. 20, 1984

