

# DUKE POWER COMPANY

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HAL B. TUCKER  
VICE PRESIDENT  
NUCLEAR PRODUCTION

September 21, 1984

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

Attention: Ms. E. G. Adensaw, Chief  
Licensing Branch No. 4

Re: Catawba Nuclear Station  
Docket Nos. 50-413 and 50-414

Dear Mr. Denton:

On July 13, 1984, Duke Power Company requested an exemption from certain requirements of 10 CFR Part 50, Appendix A, General Design Criteria (GDC) 1, as such related to fuel load and precritical testing activities. By letter dated October 26, 1983, Duke proposed to upgrade the pressurizer PORV's and steam generator PORV's to safety-related in order to comply with the requirements of BTP RSB 5-1, that cold shutdown can be achieved from the Control Room using only safety-related equipment. In order to allow sufficient time to implement these modifications, Duke requested that the modifications be installed during the first refueling outage for the unit. In Supplement 2 to the Catawba SER, the Staff agreed that this was an acceptable schedule and in Supplement 3 the Staff concluded that the requested partial exemption to GDC-1 was justified for the fuel loading and precritical testing phase of plant operation.

GDC-1 requires inpart-

"Structures, systems, and components important to safety shall be designed, fabricated, erected, and tested to quality standards commensurate with the importance of the safety functions to be performed."

In order to mitigate the effects of a steam generator tube rupture, diverse means have been provided to circulate, cool, and depressurize the Reactor Coolant System to the Residual Heat Removal (RHR) System entry conditions. Those functions may be achieved through the use of condenser dump valves, steam generator PORV's, pressurizer PORV's, high-pressure auxiliary pressurizer spray and/or normal pressurizer spray. Not all of the equipment is currently safety related. The steam generator PORV's are safety-grade valves with non safety-grade pneumatic operators, and can be operated locally to permit plant cooldown. The high-pressure auxiliary pressurizer spray has been upgraded to safety-grade. The pressurizer PORV's are safety-grade valves with non safety-grade pneumatic operators.

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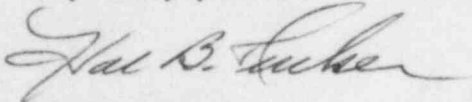
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Therefore, recognizing the redundant and diverse equipment, both safety-grade and non safety-grade as noted above, we conclude that there is reasonable assurance that means would be available to circulate, cool, and depressurize the Reactor Coolant System to RHR entry conditions in the event of a steam generator tube rupture.

It is therefore requested that the exemption to GDC-1 currently granted in Facility Operating License NPF-24 for Catawba Unit 1 be extended to the end of the first cycle of operation.

Very truly yours,



Hal B. Tucker

ROS:slb

cc: Mr. James P. O'Reilly, Regional Administrator  
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