



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

NRL PDR

DEC 18 1978

Mr. William O. Parker, Jr.  
Vice President, Steam Production  
Duke Power Company  
P. O. Box 2178  
422 South Church Street  
Charlotte, North Carolina 28242

Dear Mr. Parker:

SUBJECT: PROPOSED TOPICAL REPORT DUKE - 2, "CONDUCT OF OPERATIONS"

Your letter dated November 14, 1978, requested acceptance of a proposed topical report DUKE - 2, "Conduct of Operations". You state that this topical report will provide the information requested by Regulatory Guide 1.70, "Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants".

We have discussed the proposed topical report with the technical review branches which will be responsible for its review. Your letter leaves us with two fundamental questions. I will discuss each in turn.

1. Do you intend to include in this topical report all six sections of Chapter 13 as described in the above reference? We conclude as a result of our discussions that a topical report addressing Section 13.2 Training and Section 13.5 Plant Procedures might be beneficial in increasing the efficiency of the staff's review process for applications that reference the topical report. On the other hand, if you intend to include Sections 13.1, 13.3, 13.4 or 13.6 we suggest a meeting to discuss the content and relationship of this topical report with the applicable nuclear plants. Our experience with other utilities leads us to expect that specific features characteristic of individual plants and sites counterbalance the review advantages of the topical report approach for these sections.
2. How do you intend to divide the required information within each section between the topical report and the FSAR? We suggest that you submit a detailed outline of your proposed topical report for our review. Then perhaps we can schedule a meeting to discuss the content of the proposed topical report and how it might interface and be applicable to specific nuclear plants.

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DEC 18 1978

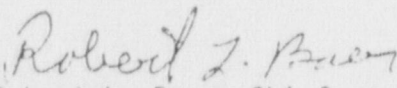
In our discussions within the staff we have also received the following specific comments which may be useful to you:

1. We see no difficulty associated with addressing subsection 13.1.1 in a topical report, except that the Standard Review Plan for that subsection is being revised; therefore, any information submitted in a topical report should be consistent with Revision 1 to that Standard Review Plan Section.
2. Subsection 13.1.2, "Operating Organization" should be the same for all the Duke applications, except the shift crew composition for the operation of units might differ depending on whether or not they have common control rooms and for the differences between the two-unit and the three-unit plants.
3. Subsection 13.1.3.2, "Qualification of Plant Personnel" would be different for each plant. While qualification requirements for each operating staff organization position can be specified in the topical report, the resumes of actual persons filling those positions cannot. Therefore, that portion of this subsection is more logically presented as part of the FSAR for each plant.
4. At the FSAR stage of review, Section 13.6 Security Plan should be a separate submittal because of the proprietary information included in this section. The inclusion of proprietary information in the topical report will further complicate its review.

Your letter notes that the topical report will provide the information requested by Regulatory Guide 1.70, Revision 2. In the interest of reducing the number of questions and expediting the review you should amend your topical report to provide the information requested by Regulatory Guide 1.70, Revision 3, November 1978.

Please advise us of your intentions with respect to the above questions and your schedule for submitting a detailed outline.

Sincerely,

  
Robert L. Baer, Chief  
Light Water Reactors Branch No. 2  
Division of Project Management