

DUKE POWER COMPANY

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March 25, 1988

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D. C. 20555

Subject: Duke Power Company  
Oconee Nuclear Station  
Docket Nos. 50-269, -270, -287  
McGuire Nuclear Station  
Docket Nos. 50-369, -370  
Catawba Nuclear Station  
Docket Nos. 50-413, -414  
Response to Generic Letter 88-02

Dear Sir:

Generic Letter 88-02 requested each licensee to evaluate the NRC's latest revision of the Integrated Safety Assessment Program (ISAP II) and to indicate whether the licensee had an interest in participating in the program. Duke Power personnel met with the Staff on March 1, 1988 concerning ISAP II in order to discuss program details that would assist us in arriving at a decision regarding our participation. We would like to express our appreciation for the time that the Staff members took to present us with an outline of the ISAP II Program.

With consideration of the ISAP Program elements and the potential benefits of the process, we have reviewed our particular situation. In particular, there are very few regulatory issues where Duke has not identified a course of action and established appropriate implementation schedules through the Project Managers. For the few issues that are still outstanding, Duke is confident that appropriate solutions and implementation schedules can be negotiated with the Staff. Duke has also examined regulatory issues, such as Unresolved Safety Issues, on the horizon that could generate significant actions or plant modifications. At the time, it appears that such requirements would be modest and could be managed within the existing framework. If this were not to be the case, then Duke would reconsider the value of a program such as ISAP.

Although not central to our decision, we also have some concerns regarding the lack of definition for certain elements of the program. In order to provide utilities that may participate with a complete description of the program, the Staff should further define items such as use of License Amendments and the Operating Experience Review.

We would also like to offer comments relative to the use of PRA to screen or prioritize issues for a given plant. In that all the Duke plants and numerous other units already have or shortly will have PRA's, this tool should be used to examine issues, regardless of whether this is in the context of ISAP or normal

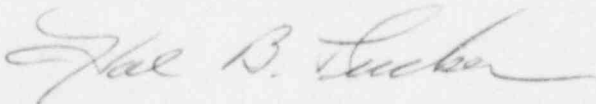
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regulatory interface. This is not to say that PRA could or should be the sole determining factor, but it is a powerful tool that properly used can provide insight into the validity of imposing or not imposing additional requirements on an individual plant. In our case, we see the need occasionally to use PRA results in determining priority use of resources between our three (3) nuclear sites. As explained to us, ISAP II does not consider priority between units or sites.

Based on the above described review, we do not consider the benefits to Duke to warrant participation in ISAP II.

Very truly yours,



Hal B. Tucker

NAR/8002/sbn

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