

# DUKE POWER COMPANY

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September 12, 1986

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

Attention: Mr. B. J. Youngblood, Project Director  
PWR Project Directorate No. 4

Re: Catawba Nuclear Station  
Docket No. 50-413 and 50-414

Dear Mr. Denton:

On July 9, 1986, Duke Power Company (Duke) submitted a proposed amendment to the Technical Specifications for Catawba Units 1 and 2. The proposed change would allow an exception to the experience requirements of Specification 6.3.1 for two Senior Reactor Operator (SRO) upgrade applicants. A similar request had been approved on January 24, 1986 for six SRO upgrades at Catawba.

On September 2, 1986, Duke received a response from the Staff denying the requested Technical Specification change. The reason given for the denial was the Staff's conclusion that extenuating circumstances do not exist in the current situation since both Catawba units are in operation. This conclusion is apparently in reference to the circumstances that existed approximately one year ago for the group of six SRO upgrades granted waivers by the Staff. At that time, the six SRO's could have been "cold" licensed as SRO's on Catawba Unit 2 which was not yet in operation, but could not be "hot" licensed as SROs on Catawba Unit 1 due to the experience requirements of Technical Specification 6.3.1. These circumstances were noted in the Federal Register Notice (50 FR 46212) that preceded the January 24, 1986 amendment, but were not cited as a basis for granting the requested waiver in the Safety Evaluation that accompanied the amendment. Instead it was noted that waivers may be granted on a case-by-case basis if the NRC staff determines that an equivalency to the standard guidelines exists.

In an effort to demonstrate that the two current SRO upgrade candidates possessed an equivalent amount of experience to that required by the Technical Specification requirement, Duke Power supplemented the License applications of K. W. Beaver and T. S. Ramseur on August 4, and August 27, 1986. Copies of these letters to NRC/Region II are attached (home addresses have been deleted). As demonstrated by these supplements and the original applications both candidates have been highly trained at Catawba, each has held a reactor operator license for approximately 2 years (27 months and 22 months, respectively). Both candidates have greater than 8 1/2 years of experience on-site at Catawba, during which each has been actively involved in preoperational testing and checkout, startup testing, and operator training.

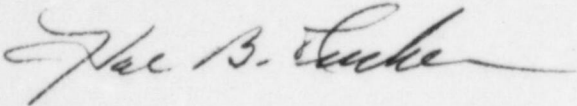
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It is therefore our conclusion that each applicant's work-related experience and training more than offsets the amount by which his experience falls short of the stated guidelines. It is therefore requested that the NRC reconsider the denial of the July 9, 1986 amendment and proceed expeditiously to process the requested Technical Specification change.

Very truly yours,



Hal B. Tucker

ROS/14/slb

Attachment

xc: Dr. J. Nelson Grace, Regional Administration  
U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323

NRC Resident Inspector  
Catawba Nuclear Station