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SUBJECT: Comment supporting draft reg guide DG-1074, "Steam Generator Tube Integrity." Duke Energy Corp endorses comments transmitted by NEI ltr dtd 990630.

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June 30, 1999

Rules and Directives Branch
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: Duke Energy Corporation

Oconee Nuclear Station - Units 1, 2, and 3
Docket Nos. 50-269, 50-270, and 50-287

McGuire Nuclear Station - Units 1 and 2
Docket Nos. 50-369 and 50-370

Catawba Nuclear Station - Units 1 and 2
Docket Nos. 50-413 and 50-414

Response to Draft Regulatory Guide DG-1074, "Steam
Generator Tube Integrity"

This letter transmits Duke Energy Corporation's comments on Draft Regulatory Guide DG-1074. Duke Energy's comments on DG-1074 are based on the fact that DG-1074 does not reflect the current state of the industry/NRC discussion on NEI 97-06 and its supporting generic license change package and it is also too prescriptive. The NRC has recognized this joint effort as the best path to a successful resolution of steam generator program issues. Duke Energy Corporation supports this joint effort. As previously stated in my letter of February 24, 1998, Duke Energy Corporation has implemented the requirements of NEI 97-06 as of the first refueling outage that occurred after January 1, 1999, in accordance with the industry initiative.

Duke Energy Corporation endorses the comments transmitted by NEI letter dated June 30, 1999, Subject: "Transmittal of Industry Comments on Draft Regulatory Guide DG-1074."

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9907280276 990630
PDR REGGD.
XX.XXX C PDR

Rules and Directives Branch
U. S. Nuclear Regulatory Commission
June 30, 1999
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Duke Energy Corporation has no other specific comments on Draft
Regulatory Guide DG-1074.

Inquiries regarding this letter should be directed to J.S.
Warren at telephone (704) 382-4986.

Very truly yours,

A handwritten signature in black ink, appearing to read "M. S. Tuckman", with a long horizontal flourish extending to the right.

M. S. Tuckman