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50-413	Catawba Nuclear Station, Unit 1, Duke Power Co.		05000413
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AUTH. NAME	AUTHOR AFFILIATION
TUCKMAN, M.S.	Duke Power Co.
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SUBJECT: Forwards Duke Energy Corp comments on draft Reg Guide
 DG-5008 (proposed Rev 2 of Reg Guide 5.62).

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M. S. Tuckman
Executive Vice President
Nuclear Generation

Duke Power Company
A Duke Energy Company

EC07H
526 South Church Street
P.O. Box 1006
Charlotte, NC 28201-1006

(704) 382-2200 OFFICE
(704) 382-4360 FAX

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U.S. Nuclear Regulatory Commission
Document Control Desk
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SUBJECT: Duke Energy Corporation
Oconee Nuclear Station Units 1, 2 and 3
Docket Nos. 50-269, 50-270, 50-287

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

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

Pursuant to a request for comments on Draft Regulatory Guide DG-5008 (Proposed Revision 2 of Regulatory Guide 5.62), please find attached Duke Energy Corporation's comments.

If additional information is required, please contact Terry Keener at 704-382-2056.


M. S. Tuckman

Attachment

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xc: L. A. Reyes
Regional Administrator Region II
U. S. Nuclear Regulatory Commission

P. S. Tam, NRC Project Manager (ONS)
U. S. Nuclear Regulatory Commission
Washington, D. C.

D. E. Labarge, NRC Project Manager (CNS)
U. S. Nuclear Regulatory Commission
Washington, D. C.

F. Rinaldi, NRC Project Manager (MNS)
U. S. Nuclear Regulatory Commission
Washington, D. C.

M. A. Scott, NRC Senior Resident Inspector (ONS)
D. J. Roberts, NRC Senior Resident Inspector (CNS)
S. M. Shaeffer, NRC Senior Resident Inspector (MNS)

U. S. Nuclear Regulatory Commission
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Attachment: Duke Energy Corporation's Comments
Draft Regulatory Guide DG-5008
(Proposed Revision 2 of Regulatory Guide 5.62)
REPORTING OF SAFEGUARDS EVENTS

Ref. section II.(b) of Appendix G (Reportable Safeguards Events) to 10 CFR 73; specifically...

"II. Events to be recorded within 24 hours of discovery in the safeguards event log.

(b) Any other threatened, attempted, or committed act not previously defined in appendix G with the potential for reducing the effectiveness of the safeguards system below that committed to in a licensed physical security or contingency plan or the actual condition of such reduction in effectiveness."

There appears to be two distinct criteria contained within this section. The first part of the section clearly addresses a specific 'act' (whether threatened, attempted, or committed), which has the potential for reducing the effectiveness of the safeguards system below that committed to in a licensed physical security or contingency plan.

However, the second part of the section ("*...or the actual condition of such reduction in effectiveness...*") is unclear.

Does this latter part mean that any deviation from a licensee's Security/Contingency Plan should be logged?

Or, is it linked to an 'act' in some way (as is the case in the first part of the section)?