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 FACIL: 50-269 Oconee Nuclear Station, Unit 1, Duke Power Co.
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 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H.R. Office of Nuclear Reactor Regulation, Director
 EISENHUT, D.G. Division of Licensing

DOCKET #
 05000269

SUBJECT: Responds to NRC 820824 ltr re ongoing NRC research program
 to assess safety implications of control sys. Facility
 should not be used as representative B&W NSSS plant. Declines
 support of program as presently envisioned.

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HAL B. TUCKER

VICE PRESIDENT
NUCLEAR PRODUCTION

October 7, 1982

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

Attention: Mr. D. G. Eisenhut, Director
Division of Licensing

Subject: Oconee Nuclear Station, Unit 1
Docket No. 50-269

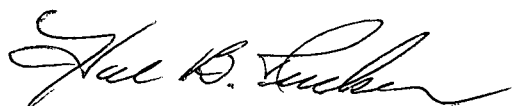
Dear Sir:

This letter is provided in response to your letter dated August 24, 1982 concerning the ongoing NRC research program to assess the safety implications of control systems. As you may recall, the Staff met with Duke Power Company on May 27, 1982 to discuss this proposed program. During the course of this meeting, Duke raised several concerns relative to this program. Among these are that the NRC Staff had not formulated a cogent, manageable, and effective plan to study this issue; that no consideration was given to utilize the existing IREP or PRA studies to identify the role of control systems with respect to risk dominant accident sequences; that no cost/benefit analysis had been performed nor any technical bases developed to justify the planned effort; and that no bases had been provided for the selection of Oconee inasmuch as Oconee is atypical of the Babcock & Wilcox NSSS design in the areas of emergency power, emergency feedwater, ECCS and plant configuration. Until your letter, no other communications had been received on the subject.

Duke is also concerned with the statement in your letter regarding use of information that has been provided for the Oak Ridge National Laboratory research program to resolve USI A-49. Duke originally agreed to participate only in the A-49 program, and the information that has been provided was intended solely for the use of Oak Ridge National Laboratory in the A-49 program. To use such information for any other program without our expressed consent is contrary to the understanding made at the start of the A-49 program with ORNL.

In view of the above, Duke respectfully declines to support the NRC in the research program to assess safety implications of control systems with the methodology, scope, and concept as presently envisioned. Duke strongly recommends that Oconee not be used as the representative Babcock & Wilcox NSSS plant. If the NRC continues the program using available Oconee technical information, Duke requests that all draft reports be provided for our review and comment prior to being released to the public.

Very truly yours,



Hal B. Tucker

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Mr. Harold R. Denton, Director
October 7, 1982
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cc: Mr. Victor Stello
Deputy Executive Director for Regional
Operations and Generic Requirements
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Mr. Philip C. Wagner
Office of Nuclear Reactor Regulation
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Washington, D. C. 20555