

**DUKE POWER COMPANY**

P.O. BOX 33189  
CHARLOTTE, N.C. 28242

HAL B. TUCKER  
VICE PRESIDENT  
NUCLEAR PRODUCTION

TELEPHONE  
(704) 373-4531

February 14, 1984

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

Attention: Ms. E. G. Adensam, Chief  
Licensing Branch No. 4

Re: McGuire Nuclear Station  
Docket No. 50-369

Dear Mr. Denton:

McGuire Nuclear Station Facility Operating License contains Condition No. 2.C.(6) entitled "Steam Generator Inspection" which states:

"Prior to start-up after the first refueling, the licensee shall install inspection ports in each steam generator or have an acceptable alternative for inspection. This condition references item 5.3.1 in SER Supplement 4, NUREG-0422."

This condition reflected the Staff concern regarding early detection of the "denting" phenomenon which results in support plate deformation and eventual tube degradation. This requirement was specified over three years ago and since that time other inspection techniques have been identified for detecting the onset of denting and more experience has been gained in steam generator operation which will minimize the potential for denting to occur. As a result, the Staff concluded in SER Supplement 6, NUREG-0422 (February 1983) that inspection ports were not required to be installed in the McGuire Unit 2 steam generators.

Duke Power Company has an aggressive program to control steam generator chemistry within specified limits. Tight chemistry control and inservice inspection serve to minimize damage to the steam generator tubes due to denting or other types of degradation. The primary inspection techniques are eddy current testing and profilometry measurements on steam generator tubes. These inspection methods are capable of detecting denting, pitting, erosion, wastage, corrosion and cracking. The profilometry measurement will provide some predictive capability since it reveals any sludge or corrosion product buildup on the tubes which is most likely to occur at the tube sheet or support plate locations. These inspection methods and the scope of the inspections will be reviewed periodically to assure that appropriate, new state-of-the-art techniques are used in assessing conditions inside the steam generators. Of course, the inservice inspection program outlined in Technical Specification 3/4.4.5 will be followed as a minimum.

8402230106 840214  
PDR ADOCK 05000369  
E PDR

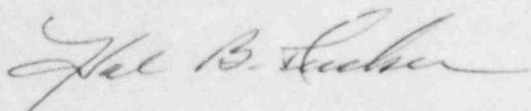
4047  
1/0

Mr. Harold R. Denton, Director  
February 14, 1984  
Page 2

In summary, it is Duke Power Company's position that the steam generator monitoring and testing programs in effect and planned are an acceptable alternative to inspection ports for McGuire Unit 1. This conclusion is consistent with the position taken by the NRC Staff on McGuire Unit 2. Accordingly, it is concluded that License Condition 2.C.(6) has been satisfied.

Please advise if there are any questions concerning this matter.

Very truly yours,



Hal B. Tucker

GAC/php

cc: Mr. W. T. Orders  
NRC Resident Inspector  
McGuire Nuclear Station

Mr. James P. O'Reilly, Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30303