

DUKE POWER COMPANY

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HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

July 6, 1984

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

Re: Catawba Nuclear Station, Unit 1
Docket No. 50-413

Subject: Applicants' Application for Partial
Exemption from GDC 3

Dear Mr. Denton:

Pursuant to 10 CFR §50.12, Duke Power Company, et al. (Applicants) hereby request an exemption from the requirement of 10 CFR Part 50, Appendix A, General Design Criterion (GDC) 3, as such relates to fuel load and pre-critical testing activities.

On June 29, 1984 applicants notified the Commission that certain fire protection program requirements would not be complete at the time of fuel loading for Unit 1. Among these items were the following:

1. The carbon dioxide fire protection system for 1A Diesel Generator is not completely installed and the acceptance test has not been conducted. The diesel generator is being overhauled and will be in service by initial criticality. The installation and testing of the fire protection system will be completed to support this schedule.
2. A fire detector will be installed in the bay above the Turbine-Driven Auxiliary Feedwater Pump Pit on elevation 543 prior to initial criticality. Detection is provided throughout the remainder of the area. The combustible loading is light in this area. Cables associated with Train A and the turbine-driven pump are wrapped with a one-hour fire rated insulating material.
3. Cork filler material installed in seismic expansion joints between the Reactor Building and Auxiliary Buildings east of column line EE will be replaced such that fire areas 4, 11, and 18 will be completely separated. Due to the presence of open spiral stairs between elevation 594 and 577, fire areas 18 and 22 will be combined. Cork filler material will be replaced by initial criticality.

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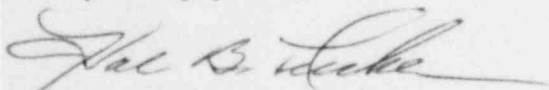
4. Certain features associated with the Standby Shutdown System will not be completed by initial fuel loading. This integrated system is provided, in part, to assure that a single fire will not affect the ability to achieve and maintain a hot standby condition. Each of these features will be complete prior to initial criticality.

The following features are involved:

- a) Standby Shutdown Facility Diesel Generator Fuel Line Modification
 - b) Standby Makeup Pump Capacity Modification
 - c) Train A Disconnect Enclosure Cover Modification
 - d) Standby Makeup Pump SSF Flow Gage Modification
 - e) Standby Shutdown System Related Eight-Hour Emergency Lights Modifications
 - f) Standby Shutdown System Related Equipment Access Platforms
5. Damage Control Measures and Cold Shutdown Procedures required by Appendix R, Section III L will be completed and personnel will be trained on these procedures by initial criticality. These procedures will be developed to recover from an event which affects redundant trains of equipment required to achieve cold shutdown.

By letters dated June 20 and June 28, 1984 Applicants requested a partial exemption from GDC 17 in order to permit the diesel generators for Unit 1 to be inoperable until initial criticality. It is considered that the technical and legal arguments supporting that request also encompass the situation presented in this application in terms of the potential safety impact and the legal basis for granting such an exemption. Therefore, Applicants hereby request that the Commission issue an exemption to GDC 3 that would allow the above referenced items to be completed prior to initial criticality.

Very truly yours,



Hal B. Tucker

NAR:scs

cc: Mr. J. P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

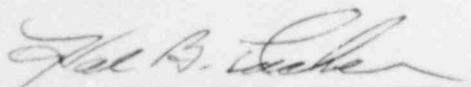
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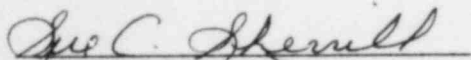
NRC Resident Inspector - Catawba

HAL B. TUCKER, being duly sworn, states that he is Vice President of Duke Power Company; that he is authorized on the part of said Company to sign and file this application; and that all statements and matters set forth therein are true and correct to the best of his knowledge.



Hal B. Tucker, Vice President

Subscribed and sworn to before me this 6th day of July, 1984



Notary Public

My Commission Expires:

Sept. 20, 1984