

# DUKE POWER COMPANY

POWER BUILDING, BOX 33189, CHARLOTTE, N. C. 28242

A. C. THIES  
EXECUTIVE VICE PRESIDENT  
POWER OPERATIONS

(704) 373-4249

July 11, 1984

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 4

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) 4, as such relates to fuel load and pre-critical testing activities.

On May 31, 1984 Applicants provided the staff with information to resolve outstanding seismic qualification issues identified in the meeting held on May 21 and 22, 1984. That letter identified two items that will remain open past the expected fuel load date for Unit 1 at Catawba:

1. Analyses of the Residual Heat Removal pump/motor.
2. Seismic qualification of the Electrical Isolation System for Reactor Protection System cabinets.

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. As noted in our letter of May 31, 1984 Applicants have made a good faith effort to comply with GDC 4 as evidenced by the responses to the staff's outstanding concerns in this area. Therefore, Applicants hereby request that the Commission issue an exemption to GDC 4 that would allow the above referenced items to be completed prior to initial criticality.

Very truly yours,



A. C. Thies

NAR/slb

8408060072 840711  
PDR ADOCK 05000413  
A PDR

*Handwritten:* A001  
1/0

Mr. Harold R. Denton, Director  
July 11, 1984  
Page Two

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

Mr. Jesse L. Riley  
Carolina Environmental Study Group  
854 Henley Place  
Charlotte, North Carolina 28207

Robert Guild, Esq.  
Attorney-At-Law  
P. O. Box 12097  
Charleston, South Carolina 29412

Palmetto Alliance  
2135 1/2 Devine Street  
Columbia, South Carolina 29205

NRC Resident Inspector - Catawba

A. C. Thies, being duly sworn, states that he is Executive Vice President of Duke Power Company; that he is authorized on the part of said Company to sign and file with the Nuclear Regulatory Commission this application; and that all statements and matters set forth therein are true and correct to the best of his knowledge.

*A. C. Thies*

A. C. Thies, Executive Vice President

Subscribed and sworn to before me this 11th day of July, 1984.

*Sue C. Merrill*

Notary Public

My Commission Expires:

*Sept. 20, 1984*