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DUKE POWER

61FR 55675  
Oct. 28, 1996

January 9, 1997

Rules Review and Directives Branch, DFIPS  
Office of Administration  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

RULES REVIEW  
USNRC

1997 JAN 22 AM 10:08

Subject: Catawba Nuclear Station Units 1 & 2  
Docket Nos. 50 -413, 414  
McGuire Nuclear Station Units 1 & 2  
Docket Nos. 50 -369, 370  
Oconee Nuclear Station Units 1, 2, & 3  
Docket Nos. 50 -269, 270, 287  
Comments on Draft Regulatory Guide DG-1045  
(Proposed Revision 3 to Regulatory Guide  
1.105): Setpoints For Safety-Related  
Instrumentation, Dated October 1996

The NRC issued for public comment a draft of Revision 3 to Regulatory Guide 1.105. Duke Power appreciates the opportunity to provide the following comments on this document.

On page 3 of the Discussion Section, the third full paragraph, there is some confusion and disagreement with the sentence in this paragraph that reads as follows, "The trip setpoint value is generally represented by the upper limit identified in Figure 1 (acceptable as-left condition)." We disagree with this statement. In fact, this statement is contradicted by a later sentence in the same paragraph that reads, "The trip setpoint as depicted in Figure 1 is consistent with the term 'nominal' trip setpoint..."

Additionally, there is a large amount of discussion concerning Generic Letter 91-04, "Changes to Technical

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(61FR 55675)

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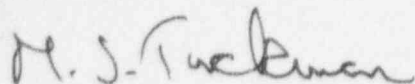
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Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle." We are not convinced that this subject merited the amount of attention that it was given in this document.

The next to last paragraph in the Discussion Section addresses "Measurement and Test Equipment (MTE)" and the fact that the ISA standard does not specifically address MTE criteria. Our position is that the MTE criteria is not as important as accounting for the MTE uncertainties. This is consistent with the ISA standard.

Should you have questions or need additional information, please contact Allison Jones-Young at (704) 382-3154.

Very truly yours,

A handwritten signature in dark ink, appearing to read "M.S. Tuckman". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

M.S. Tuckman  
Senior Vice President  
Nuclear Generation

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