

DUKE POWER COMPANY

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November 20, 1985

Mr. Karl Kniel  
Division of Safety Technology  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Subject: Comments on Draft NUREG-1030  
"Seismic Qualification of Equipment in  
Operating Nuclear Power Plants" and  
"Regulatory Analysis for Proposed  
Resolution of Unresolved Safety Issue A-46"

Dear Mr. Kniel:

The NRC published in the September 4, 1985 Federal Register Draft NUREG-1030 and a regulatory analysis document in support of the NRC Staff's proposed resolution to USI A-46. Duke Power Company has reviewed these documents and offers the following comments for your consideration.

Comment 1

Duke Power Company commends the NRC and industry cooperative efforts to address and resolve USI A-46.

Comment 2

Duke Power Company fully supports the Seismic Qualification Utility Group (SQUG) effort and endorses the specific comments provided to you by SQUG on the subject documents. Further, we would like to emphasize that Duke concurs with the SQUG overall conclusion that the seismic qualification of equipment in operating nuclear power plants is not a significant safety issue. The SQUG effort has provided significant evidence that the potential of realizing a safety benefit from further work is limited to anchorage and relay functionality verifications. However, implementation of that work should only be required if a quantitative value - impact assessment meeting the intent of 10 CFR 50.109 Backfitting justifies the proposed licensee expenditures. In this regard, Duke fully endorses the comments provided by the Nuclear Utility Group on Equipment Qualification.

Comment 3

With regard to the plants that are identified as being within the scope of USI A-46, Duke Power Company notes that the McGuire Nuclear Station should not be included. Consistent

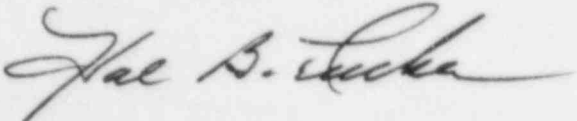
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with Paragraph 1 of Section IV of the Regulatory Analysis (pages 3 & 4), the McGuire Nuclear Station was evaluated to current requirements (IEEE 344-1975 and Regulatory Guide 1.100) and found to be in compliance as documented in NUREG-0422, (McGuire SER dated March 1978, and SER Supplement 6, dated February, 1983).

Very truly yours,

A handwritten signature in cursive script, reading "Hal B. Tucker".

Hal B. Tucker

JSW:slb