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PR-*Mass. Notice*
Reg. Guide

June 7, 1978

Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555
ATTN: Docketing and Service Section

Subject: NRC Regulatory Guide 1.137
Comments for Early Revision
Duke File: A-12.16-2



Gentlemen:

We request that the attached comments be considered in any early revision to the subject guide. Our representative, J. E. Beall, will serve as a point of contact if additional discussion is desired.

Very truly yours,

L. C. Dail

L. C. Dail
Vice President
Design Engineering

JEB/tas

Attachment

Acknowledged by card *6/28 S. S.*

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Regulatory Guide 1.137 (Rev. 0)
Comments for Early Revision

1) General:

The implication of this Regulatory Guide in respect to Cathodic Protection System is that it should be safety related. We disagree with this implication since failure of the cathodic protection equipment between the tests will not have any safety consequences. We suggest that it be clarified within the document that cathodic protection system equipment is not safety related and, therefore, not subject to requirements placed on safety systems.

2) Position C.1.g

This paragraph states that an impressed current cathodic protection system is required. We recommend that this be revised to require that cathodic protection be provided where soil analysis indicates a need. This qualified requirement is preferable to the blanket requirement as it provides cathodic protection where needed and eliminates installation of unnecessary systems.