

Jan. 19, 1981

ALL LICENSEES OF OPERATING PLANTS AND APPLICANTS FOR OPERATING LICENSES AND HOLDERS OF CONSTRUCTION PERMITS

SUBJECT: INFORMATION REGARDING THE PROGRAM FOR ENVIRONMENTAL QUALIFICATION OF SAFETY-RELATED ELECTRICAL EQUIPMENT (GENERIC LETTER 81-05)

Reference (a) - Order for Modification of License concerning the Environmental Qualification of Safety-Related Electrical Equipment, October 24, 1980

Reference (b) - Commission Memorandum and Order of May 23, 1980 (80-CLI-21)

Reference (c) - I&E Bulletin 79-01B Supplement No. 3, October 24, 1980

On October 24, 1980, the staff issued Orders [Reference (a)] to all power reactor licensees, which modified their Technical Specifications in accordance with the Commission-ordered Environmental Qualification Requirements [Reference (b)]. The purpose of this letter is to provide information in response to licensee requests, regarding these Orders and the associated staff actions. The specific items to be addressed involve the environmental qualification (E-Q) requirements of the electrical equipment for the following: (1) equipment necessary to achieve a cold shutdown, (2) replacement parts, (3) Three Mile Island (TMI) Action Plan (NUREG-0737) equipment and (4) the June 30, 1982 deadline of Ref. (a).

(1) Cold Shutdown - Reference (c) requires licensees to submit E-Q information for the equipment necessary to achieve and maintain a cold shutdown condition. This Bulletin requirement was not intended to invoke a change in the licensing basis of the plant. Plants licensed to a hot "safe shutdown" condition are only required by Reference (a) to qualify the equipment necessary to achieve a hot shutdown (i.e., plant specific safety-related equipment). However, the Bulletin (Reference c) does require that the licensee submit the presently available information for one path to achieve the cold shutdown conditions. The Reference (c) position represents an enveloping staff position to be implemented on a case-by-case basis. Regulatory Guide 1.139 contains the implementation plans for the cold shutdown requirements, of which E-Q is a part. Staff reviews are in progress on this issue.

(2) Replacement Parts - We note that this requirement is set forth in reference (b) but not explicitly in the ordering clauses of reference (a). In this regard, the E-Q requirements for replacement parts are

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Priority

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- (1) Cold Shutdown - Reference (c) requires licensees to submit E-Q information for the equipment necessary to achieve and maintain a cold shutdown condition. This Bulletin requirement was not intended to invoke a change in the licensing basis of the plant. Plants licensed to a hot "safe shutdown" condition are only required by Reference (a) to qualify the equipment necessary to achieve a hot shutdown (i.e., plant specific safety-related equipment). However, the Bulletin does require that the licensee submit the available information. The Reference (c) position represents an enveloping staff position to be implemented on a case-by-case basis. Regulatory Guide 1.139 contains the implementation plans for the cold shutdown requirements, of which E-Q is a part. Staff reviews are in progress on this issue.
- (2) Replacement Parts - The E-Q requirements for replacement parts are clearly presented in Supplement No. 2 to IEB 79-01B (September 30, 1980). It is the licensee's responsibility to justify deviation from the Category I column of NUREG-0588 in an auditable manner. "Sound reasons" for such deviation are plant/equipment specific. Examples such as availability or system incompatibility, are a matter of degree and will be judged accordingly. The subjective aspect of this requirement is necessary and will be addressed on a case-by-case basis.

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(3) NUREG-0737 Equipment - The qualification requirements for this equipment are specifically addressed in Appendix B to the NUREG. The schedule for submitting the information to the NRC is contained in Reference (c). Contingencies for equipment unavailability are addressed in the NUREG. If the licensee's position on any of this equipment is that it is not safety-related that position should be justified in the submittal. Staff judgements in this regard will be made in a Supplement to the original Safety Evaluation.

Safety Evaluation Implementation - Reference (b) requires the staff to issue Safety Evaluations by February 1, 1981. These Safety Evaluations will be issued with a request for licensee response under the provisions of 10 CFR 50.54(f). Subsequent to the staff review of that response, the staff will issue Confirmatory and/or Show Cause Orders which provide the opportunity for a hearing to implement the specific requirements applicable to that facility. This procedure may make existing hearing/extension requests based on Reference (a), unnecessary. Licensees with such requests should review this matter and advise the NRC of their intents as soon as possible. Formal notification is necessary to change existing requests.

Sincerely,

Darrell G. Eisenhut, Director
Division of Licensing

E. J. ...

*SEE PREVIOUS WHITE FOR CONCURRENCE

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SURNAME ▶	*MWilliams:kf	*Tippolito	TNovak	RWimmer	SSohinki	RPurple	DEisenhut
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- (1) Cold Shutdown - Reference (c) requires licensees to submit E-Q information for the equipment necessary to achieve and maintain a cold shutdown condition. This Bulletin requirement was not intended to invoke a change in the licensing basis of the plant. Plants licensed to a hot "safe shutdown" condition are only required by Reference (a) to qualify the equipment necessary to achieve a hot shutdown (i.e., plant specific safety-related equipment). However, the bulletin does require that the licensee submit the available information. The Reference (c) position represents an enveloping staff position to be implemented on a case-by-case basis. Regulatory Guide 1.139 contains the implementation plans for the cold shutdown requirements, of which E-Q is a part. Staff reviews are in progress on this issue.
- (2) Replacement Parts - The E-Q requirements for replacement parts are clearly presented in Supplement No. 2 to IEB 79-01B (September 30, 1980). It is the licensee's responsibility to justify deviation from the Category I column of NUREG-0588 in an auditable manner. "Sound reasons" for such deviation are plant/equipment specific. Examples such as availability or system incompatibility, are a matter of degree and will be judged

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accordingly. The subjective aspect of this requirement is necessary and will be addressed on a case-by-case basis.

- (3) Mild Environments - It is apparent that, in some cases, the staff's view of the scope of this task differs significantly from the licensee's view. The requirements are contained in the D.O.R. Guidelines and NUREG-0588. Programs are required to address aging. Equipment should be qualified for the environmental extremes associated with loss of its non-redundant HVAC for the time it is required to operate plus margin. Throughout the Guidelines, the licensee may, as an alternative, provide contingencies to maintain environmental parameters within the equipment specifications or provide the necessary standard of reliability. In the case of mild environments, such alternatives are much more feasible due to the accessibility of the components. Licensees should proceed with their mild environment program based on the existing requirements. More detailed information regarding the mild environment NRC review will be provided next March.
- (4) NUREG-0737 Equipment - The qualification requirements for this equipment are specifically addressed in Appendix B to the NUREG. The schedule for submitting the information to the NRC is contained in Reference (c). Contingencies for equipment unavailability are addressed in the NUREG. If the licensee's position on any of this equipment is that it is not safety-related that position should be justified in the submittal. Staff judgements in this regard will be made in a Supplement to the original Safety Evaluation.
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Darrell G. Eisenhut, Director
Division of Licensing

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the Category I column of NUREG-0588 in an auditable manner. "Sound reasons" for such deviation are plant/equipment specific. Examples such as availability or system incompatibility, are a matter of degree and will be judged accordingly.

- (3) NUREG-0737 Equipment - The qualification requirements for this equipment are specifically addressed in Appendix B to the NUREG. The Schedule for submitting the information to the NRC is contained in Reference (c). Contingencies for equipment unavailability are addressed in the NUREG. If the licensee's position on any of this equipment is that it is not safety-related within the meaning of reference (2), that position should be justified in the submittal. Staff judgments in this regard will be made in a Supplement to the original Safety Evaluation.
- (4) June 30, 1982 Deadline - Some licensees have indicated that the new E-Q requirements have resulted in saturation of the test/production capabilities of the industry, and violations of the deadline may occur. Licensees should note that the Ref. (a) orders implemented a Commission imposed deadline [Ref. (b)] and the staff is unable to grant relief from this deadline.

Some licensees have submitted either a hearing request or a request for an extension of the time to request a hearing in regard to Ref. (a). Others have submitted letters of concern regarding specific requirements. The former will be addressed on an individual basis. This letter responds to the generic concerns of both groups.

Sincerely,

Darrell G. Eisenhut, Director
Division of Licensing

*See attached file copy for previous concurrences

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*with comment
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