



February 16, 2004

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001

Attn: Richard Barrett, Director
Division of Engineering
Office of Nuclear Reactor Regulation

Subject: Revision 3A to the Generic Implementation Procedure
For Seismic Verification of Nuclear Plant Equipment

Dear Mr. Barrett:

This letter forwards Revision 3A of the Seismic Qualification Utility Group's (SQUG) "Generic Implementation Procedure (GIP) for Seismic Verification of Nuclear Plant Equipment" for your review and approval. In accordance with its commitments to the NRC regarding changes to the GIP, SQUG previously submitted Revision 3 to the GIP for NRC review and approval.¹ The NRC provided the results of its review in Supplemental Safety Evaluation Report No. 3 (SSER-3), finding Revision 3 of the GIP acceptable.²

SQUG has subsequently incorporated clarifying information discussed in the SSER-3 into a revision of the GIP (Revision 3A on enclosed CD-ROM), as recommended by the NRC Staff.³ Also included in Revision 3A are clarifications, interpretations, positions, and exceptions identified by the NRC Staff in SSER-2,⁴ and changes to address specific issues identified by the NRC Staff in its review of plant-specific implementation of the A-46 program at the SQUG

¹ N. Smith (SQUG) to J. Stolz (NRC), "Generic Implementation Procedure (GIP) for Seismic Verification of Nuclear Power Plant Equipment, Revision 3, Updated 05/16/97, and Procedure for Revising the GIP, Revision 3" (May 16, 1997).

² J. Stolz (NRC) to N. Smith (SQUG), "Supplemental Safety Evaluation Report No. 3 (SSER No. 3) on the Review of Revision 3 to the Generic Implementation Procedure for Seismic Verification of Nuclear Power Plant Equipment, Updated May 16, 1997, (GIP-3) (TAC No. M93624)" (Dec. 4, 1997).

³ "The staff recommends that future revision of the GIP should include, as applicable, any necessary clarification to the provisions, to reflect the staff's position, in areas identified as ambiguous or susceptible to misinterpretation by GIP users." NRC letter (Dec. 4, 1997), at 1, referring to its December 2, 1997, letter to SQUG.

⁴ J. Partlow (NRC) to All Unresolved Safety Issue (USI) A-46 Plant Licensees Who Are Members of the Seismic Qualification Utility Group (SQUG), "Supplement No. 1 to Generic Letter (GL) 87-02 that Transmits Supplemental Safety Evaluation Report No. 2 (SSER No. 2) on SQUG Generic Implementation Procedure, Revision 2, as Corrected on February 14, 1992 (GIP-2)" (May 22, 1992).

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member plants.⁵ Finally, Revision 3A includes changes to address the NRC Staff's review of the SQUG guidance regarding use of the GIP for new and replacement equipment (NARE).⁶

This revision contains no new technical, licensing, or regulatory positions that have not previously been reviewed and approved by the NRC Staff. Revision 3A was developed as a compilation into one document of all information necessary for future use of the GIP. This document will facilitate SQUG members in using the GIP without having to independently interpret how other documents affect its implementation. Because Revision 3A provides only clarifying information beyond Revisions 2 and 3, which were previously approved by the NRC, SQUG considers this document to be an additional statement of the accepted criteria and guidance that does not change the NRC's previous approvals. Accordingly, the GIP, Revision 3A, is provided in accordance with Revision 3 of the SQUG "Procedure for Revising the GIP,"¹ which the NRC has previously reviewed and approved.² SQUG determined that a Peer Review Panel review was unnecessary because no substantive changes to the technical requirements have been made to the GIP.

With the understanding that the NRC's previous review and approval include GIP-2 and GIP-3, and because GIP-3A incorporates clarifications only, SQUG members will use GIP-3A as a working document for implementing GIP-2 and GIP-3, as approved. Please let us know if you have any concerns with this approach, or if you have any questions concerning the information provided in this submittal.

Sincerely,



John M. Richards, Chairman
Seismic Qualification Utility Group

Enclosure

cc: K. A. Manoly, NRC (w/ 5 CD-ROMs with GIP-3A included)
R. P. Kassawara, EPRI

⁵ These issues are identified in NRC letters to individual plants for plant-specific closeout of the resolution of NRC Unresolved Safety Issue A-46. SQUG maintains a database of these letters, which are also available through the NRC Public Document Room.

⁶ E. Adensam (NRC) to N. Smith (SQUG), "Review of Seismic Qualification Utility Group's Report on the Use of the Generic Implementation Procedure for New and Replacement Equipment and Parts" (June 23, 1999).