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ON EQUIPMENT QUALIFICATION

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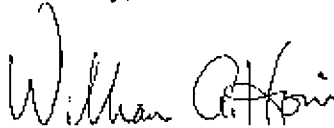
SUBJ: Comments on Draft Regulatory Guide DG-1150, "Qualification of Continuous Duty Safety-Related Motors for Nuclear Power Plants." (74 Fed. Reg. 45,654 (September 3, 2009))

Ladies and Gentlemen:

In the referenced *Federal Register* Notice, the U.S. Nuclear Regulatory Commission ("NRC") Staff requested comments concerning proposed revisions to its regulatory guidance on Qualification of Continuous Duty Safety-Related Motors for Nuclear Power Plants. The comments provided herein are submitted on behalf of the Nuclear Utility Group on Equipment Qualification ("NUGEQ" or the "Group").<sup>1</sup>

The enclosed comments and recommended DG-1150 changes are intended to help clarify the NRC guidance. We appreciate the opportunity to comment on DG-1150. Please feel free to contact the NUGEQ if the NRC Staff would like further information or clarification on any of these comments.

Sincerely,



William A. Horin  
Counsel to the Nuclear Utility Group  
On Equipment Qualification

<sup>1</sup> The NUGEQ is comprised of member electric utilities in the United States and Canada, including NRC licensees authorized to operate almost 100 nuclear power reactors in the United States. The NUGEQ was formed in 1981 to address and monitor topics and issues related to equipment qualification, particularly with respect to the environmental qualification of electrical equipment pursuant to 10 C.F.R. § 50.49.

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Enclosure: DG-1150 – NUGEQ Comments

## **1. Inclusion of Components/Accessories Limited to those Required for Motor Safety Functions**

Referenced DG-1150 text:

B. Discussion (page 3) – entire text discussion on IEEE-334 improvements that address Exception 1 in RG 1.40, dated March 1973.

NUGEQ Comment: The NRC in this discussion describes several “improvements” in IEEE 334 that, in sum, adequately address the prior NRC comment (Exception 1) that was intended to ensure that “all equipment required for the motor to perform as intended was included in testing.” This discussion should emphasize that these improvements focus on those components and accessories that are required to perform or support a safety function. See in particular IEEE 334 Section 5.11, *Seals and Gaskets* and Section 5.12, *Accessories*. These improvements do not require components/accessories that are not required to perform or support a motor's safety function to be included in the qualification program.

NUGEQ Recommendation: Revise the paragraph beginning with “**Exception 1:** . . .” as follows:

*“**Exception 1:** To the extent practicable, auxiliary equipment that will be part of the installed motor assembly should also be qualified in accordance with IEEE Std 334-1971. This statement was included in the RG 1.40 to assure that all equipment required for the motor to perform its safety functions as intended was included in the qualification program testing. The following improvements have been identified to address this exception.”*

## **2. Some IEEE-334 Sections Cited Under Exception 2 Not Related to Simulating DBEs**

Referenced DG-1150 text:

B. Discussion (page 3) – entire text discussion on IEEE-334 improvements that address Exception 2 in RG 1.40, dated March 1973.

NUGEQ Comment: The NRC in this discussion describes several “improvements” in IEEE 334 that, in sum, adequately address the prior NRC comment (Exception 2) that “*Qualification tests should simulate as close as practicable all design basis events.*” However, the subsequent NRC discussion includes two IEEE-334 sections that are not directly related to simulating such DBEs. These sections are Section 3.3, *Components*, and Section 5.3.2, *Type Test Model, Para 1*. The discussion text for these sections is unrelated to simulating DBEs and is more related to the auxiliary equipment addressed in Exception 1.

## DG-1150 – NUGEQ Comments

NUGEQ Recommendation: Delete reference to and discussion of IEEE 334 Section 3.3, *Components*, and Section. 5.3.2, *Type Test Model, Para 1* under Exception 2.