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SUBJECT: Forwards revised TVA position paper re requirements for environ qualification of electrical equipment applicable to plant & requests review of info.

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ENCLOSURE

BELLEFONTE POSITION PAPER
REGARDING
ENVIRONMENTAL QUALIFICATION OF ELECTRICAL EQUIPMENT

PURPOSE

This document describes TVA's position regarding the environmental qualification of electrical equipment important to safety at the Bellefonte Nuclear Plant (BLN). TVA seeks NRC staff concurrence with TVA's position.

POSITION

The following discussion reflects TVA's position regarding environmental qualification of electrical equipment important to safety located in harsh environments at BLN:

- Equipment procured by TVA as of August 31, 1991, will be qualified to at least the standards of NUREG-0588, Category II.
- Equipment procured by TVA after August 31, 1991, will be qualified to the standards of NUREG-0588, Category I unless "sound reasons to the contrary"¹ exist. Where "sound reasons to the contrary" exist, qualification will be to at least the standards of NUREG-0588, Category II.

JUSTIFICATION

10 CFR 50.49(k) provides that applicants for operating licenses are "not required to requalify" electrical equipment "if the commission has previously required qualification of that equipment in accordance with" DOR guidelines or NUREG-0588. In the Statement of Considerations that accompanied issuance of 10 CFR 50.49, the commission noted that NUREG 0588, Category II contained the applicable qualification standards for plants for which the Construction Permit (CP) SER was issued before July 1, 1974 (48FR2729, 2730 - January 21, 1983). This is consistent with Petition for Emergency and Remedial Actions, CLI-80-21, 11 NRC 707,710 (May 27, 1980), and NRC Bulletin 79-01B, Supplement 2.

The BLN CP SER (addressing the Environmental Qualification Program) was issued on May 25, 1974. Accordingly, the applicable environmental qualification standards for electrical equipment important to safety for BLN are those in NUREG-0588, Category II. This position provides for conformance to these environmental qualification standards as a minimum.

1. Regulatory Guide (RG) 1.89, Revision 1 (June-1984), section C.6 provides examples of "sound reasons to the contrary."