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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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Tennessee Valley Authority, Post Office Box 2000, Hollywood, Alabama 35752

William J. Museler Vice President, Bellefonte Nuclear Plant

AUG 2 3 1991

U.S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, DC 20555

Gentlemen:

In the Matter of the Application of) Docket No. 50-438 Tennessee Valley Authority) 50-439

BELLEFONTE NUCLEAR PLANT (BLN) - REVISION TO TVA POSITION PAPER REGARDING ENVIRONMENTAL QUALIFICATION OF EQUIPMENT (TAC #79273)

Reference: TVA letter to NRC dated February 4, 1991, "Transmittal of TVA Position Paper Regarding Environmental Qualification of Equipment (TAC #79273)"

As a result of discussions between TVA and NRC, enclosed for staff review is the revised TVA position paper regarding the requirements for environmental qualification of electrical equipment applicable to BLN. Information contained in the enclosure to this letter supersedes and replaces in its entirety the information provided by enclosure 1 of the referenced letter. A written staff position on the enclosure is requested by September 25, 1991.

If you have any questions, please telephone Mr. Bruce Schofield at (205) 574 8058.

Very truly yours,

J. Capodanno for

W. J. Museler

Enclosure cc: See page 2

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Enclosure cc (Enclosure): NRC Resident Inspector Bellefonte Nuclear Plant P.O. Box 2000 Hollywood, Alabama 35752

> Mr. M. C. Thadani, Project Manager U.S. Nuclear Regulatory Commission One White Flint, North 11555 Rockville Pike Rockville, Maryland 20852

Mr. B. A. Wilson, Chief, TVA Projects U.S. Nuclear Regulatory Commission Region II 101 Marietta Street, NW, Suite 2900 Atlanta, Georgia 30323

ENCLOSURE

BELLEFONTE POSITION PAPER REGARDING ENVIRONMENTAL QUALIFICATION OF ELECTRICAL EQUIPMENT

PURPOSE

A. 6

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 <u>Petition for Emergency and</u> . <u>Remedial Actions</u>, 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."