

From: Weaver, Jordan [jweaver@nrdc.org]
Sent: Friday, April 05, 2013 11:28 AM
To: MacDougall, Robert
Cc: Paul Blanch; Paine, Christopher; McKinzie, Matthew
Subject: Ancillary Equipment Clarification RE: PRM-50-106

Mr. MacDougall,

Thanks again for contacting us regarding the requested changes section of our rulemaking petition, PRM-50-106. To clarify which equipment would fall within the category of “ancillary electrical equipment” (safety- and/or non-safety-related), the NRC has issued two regulatory guides that help define and identify a set of circuits and electrical equipment that comprise or are associated with safety systems:


1. Regulatory Guide 1.75, Rev 3 (Feb 2005), “Criteria for Independence of Electrical Safety Systems” <http://pbadupws.nrc.gov/docs/ML0436/ML043630448.pdf>
2. Regulatory Guide 1.189, Rev 2 (Oct 2009), “Fire Protection for Nuclear Power Plants” <http://pbadupws.nrc.gov/docs/ML0925/ML092580550.pdf>

If a circuit or component is deemed “associated” with safety-related SSCs as per the Fire Protection Program (e.g., RegGuide 1.189, Sec 5 “Safe-Shutdown Capability”) or it is considered significant because it lacks independence from other safety-related circuits (per RegGuide 1.75), we feel it should be considered in a rulemaking process that aims to revise the regulations concerning environmental qualification of said systems with respect to “submergence and/or moisture intrusion during normal operating conditions, severe weather, seasonal flooding, and seismic events, and post-accident conditions, both inside and outside of containment.”

I hope this information is helpful as the NRC continues to review PRM-50-106 and please do not hesitate to contact me if you have further questions.

Sincerely,

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From: MacDougall, Robert [<mailto:Robert.MacDougall@nrc.gov>]
Sent: Monday, April 01, 2013 5:34 PM
To: Weaver, Jordan
Subject: PRM-50-106

Dear Mr. Weaver

In our letter of March 18, 2013, we said that the NRC is currently reviewing your petition for rulemaking to revise 10 C.F.R. § 50.49 (Docket No. PRM-50-106). To help us address your

request, we need you to clarify the text under “Requested Changes to 10 C.F.R. 50,” on page 10 of your June 18, 2012 petition letter. Under this section, you wrote,

The petitioners request that the NRC initiate rulemaking to revise its regulations to clearly and unequivocally require the environmental qualification of all safety-related cables, wires, splices, connections and other ancillary electrical equipment that may be subjected to submergence and/or moisture intrusion during normal operating conditions, severe weather, seasonal flooding, and seismic events, and post-accident conditions, both inside and outside of containment.

Please clarify what types of equipment (safety-related or non-safety related) you think would fall within the category of “other ancillary electrical equipment.”

Please feel free to contact me with your response by reply e-mail at Robert.MacDougall@nrc.gov or call me at (301) 415-5175 if you have questions. I will be your principal point of contact for this petition until further notice.

Rob

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