

**REGULATORY DOCKET FILE COPY**

*Docket 50-206*

DISTRIBUTION: Please see attached sheet

**JUL 16 1980**

Mr. Donald F. Knuth, President  
KMC, Incorporated  
1747 Pennsylvania Avenue, N. W.  
Washington, D. C. 20006

Dear Mr. Knuth:

I am writing in response to your letter of March 18, 1980, to Chairman Ahearne. You objected, on behalf of the owners of plants being reviewed under the Systematic Evaluation Program (SEP), to the staff's current plans for an expedited review of the Environmental Qualification of Electrical Equipment for the SEP plants.

As you are aware, there has been considerable activity regarding this subject both within the NRC and by the industry during the interim and that all nuclear power facilities are being reviewed rather than just the SEP facilities. The general approach outlined at the February 21, 1980 meeting between owners of SEP facilities and the NRC staff and summarized in the penultimate paragraph of your letter has been adopted by the Commission. A copy of the Commission Memorandum and Order of May 23, 1980 is enclosed. The NRC staff is presently implementing the requirements of the Memorandum and Order.

The original Systematic Evaluation Program, provided in our letters of December 1, 1977 to SEP licensees, indicated that topics considered to be of special safety significance would undergo an accelerated evaluation on a case-by-case basis prior to completing the overall program. Our current environmental qualification review is consistent with that provision. In addition, the Commission's Memorandum and Order of May 23, 1980 has added impetus to this review and established a short review schedule for its completion.

We appreciate your comments on this important issue and trust that you will find this letter responsive to your concerns.

Sincerely,  
Original signed by:

Harold R. Denton, Director  
Office of Nuclear Reactor Regulation

D:NRR  
HDenton  
7/ /80

Enclosure:

Commission Memorandum and Order of May 23, 1980 \*See previous yellow for additional concurrences.

OFFICE	SEPB:DL	SEPB:DL	AD:SA:DL	D:DL	D:DE	NRR
SURNAME	DAllison*	DCrutchfield*	GLainas*	DEisenhut*	RVolmer	ECase*
DATE	6/13/80	6/13/80	6/13/80	6/26/80	7/17/80	6/26/80

8007280076

DISTRIBUTION: Please see attached sheet

Mr. Donald F. Knuth, President  
KMC, Incorporated  
1747 Pennsylvania Avenue, N. W.  
Washington, D. C. 20006

Dear Mr. Knuth:

I am writing in response to your letter of March 18, 1980, to Chairman Ahearne. On behalf of the owners of plants being reviewed under the Systematic Evaluation Program (SEP), you objected to the staff's current plans for an expedited review of the Environmental Qualification of Electrical Equipment for the SEP plants.

The original Systematic Evaluation Program, provided in our letters of December 1, 1977 to SEP licensees, indicated that topics considered to be of special safety significance would continue to be evaluated on a case-by-case basis prior to completing the overall program. This review is consistent with that provision.

The guidelines we are using were prepared to assist in evaluating equipment qualification. They were intended to be used as a screening tool and to obtain, for staff review, the justifications used for deviations from modern qualification standards. Under these guidelines the licensees identify the equipment needed to mitigate pipe breaks and the environmental conditions that could occur. The licensees also determine whether or not the equipment's qualification meets the criteria in the guidelines. If it does not, the licensees either propose remedial action or provide justification for acceptability of the equipment as it stands.

The enclosed Commission Memorandum and Order of May 23, 1980 addresses, in further detail what is to be done.

I trust you will find this responsive to your letter.

Sincerely,

Harold R. Denton, Director  
Office of Nuclear Reactor Regulation

Enclosure:  
Commission Memorandum and  
Order of May 23, 1980

OFFICE	SEPB:DL <i>DL</i>	SEPB:DL <i>DL</i>	AD:SA:DL	D:DL <i>DL</i>	NRR <i>DL</i>	D:NRR
SURNAME	DAllison:dk	DCrutchfield	GLainas	DEisenhut	ECase	HDenton
DATE	6/13/80	6/13/80	6/13/80	6/13/80	6/13/80	6/13/80

DISTRIBUTION:

Docket 50-10  
Docket 50-29  
Docket 50-155  
Docket 50-237  
Docket 50-244  
Docket 50-213  
Docket 50-409  
Docket 50-245  
Docket 50-219  
Docket 50-255  
Docket 50-206  
TERA  
NSIC  
SEP Reading  
NRR Reading  
SEP Licensees (11)  
SEP Intervenors  
SEP Members(13)  
Attorney, OELD  
ORB #2 Members (8)  
MGroff  
EHughes  
NRC PDR 50-10  
NRC PDR 50-29  
NRC PDR 50-155  
NRC PDR 50-237  
NRC PDR 50-244  
NRC PDR 50-409  
NRC PDR 50-245  
NRC PDR 50-219  
NRC PDR 50-255  
NRC PDR 50-206  
HDenton  
ECase  
DEisenhut  
GLainas  
RVollmer  
DCrutchfield  
EButcher  
WRussell  
Ertter (G) - ED008630  
LPDR 50-10  
LPDR 50-29  
LPDR 50-155  
LPDR 50-237  
LPDR 50-244  
LPDR 50-213  
LPDR 50-409

LPDR 50-245  
LPDR 50-219  
LPDR 50-255  
LPDR 50-206  
WDircks  
Cornell  
TRehm  
VStello  
DMuller  
DRoss'  
RMattson  
HBerkow  
EDO Reading  
Donna Nottingham #8630  
EHughes

OFFICE ▶  
SURNAME ▶  
DATE ▶

DISTRIBUTION: Please see attached sheet

Mr. Donald F. Knuth, President  
KMC, Incorporated  
1747 Pennsylvania Avenue, N. W.  
Washington, D. C. 20006

Dear Mr. Knuth:

I am writing in response to your letter of March 18, 1980, to Chairman Ahearne. On behalf of the owners of plants being reviewed under the Systematic Evaluation Program (SEP), you objected to the staff's current plans for an expedited review of the Environmental Qualification of Electrical Equipment for the SEP plants.

The original Systematic Evaluation Program, provided in our letters of December 1, 1977 to SEP licensees, indicated that topics considered to be of special safety significance would continue to be evaluated on a case-by-case basis prior to completing the overall program. This review is consistent with that provision.

The guidelines we are using were prepared to assist in evaluating equipment qualification. They were intended to be used as a screening tool and to obtain, for staff review, the justifications used for deviations from modern qualification standards. Under these guidelines the licensees identify the equipment needed to mitigate pipe breaks and the environmental conditions that could occur. The licensees also determine whether or not the equipment's qualification meets the criteria in the guidelines. If it does not, the licensees either propose remedial action or provide justification for acceptability of the equipment as it stands.

The enclosed Commission Memorandum and Order of May 23, 1980 addresses, in further detail what is to be done.

I trust you will find this responsive to your letter.

Sincerely,

Harold R. Denton, Director  
Office of Nuclear Reactor Regulation

Enclosure:

Commission Memorandum and  
Order of May 23, 1980

OFFICE	SEPB:DL <i>DL</i>	SEPB:DL <i>DL</i>	AD:SA:DL	D:DL	NRR	D:NRR
SURNAME	DAllison:dk	DCuttsfield	Glaunas	DEisenhut	ECase	HDenton
DATE	6/13/80	6/13/80	6/13/80	6/ /80	6/ /80	6/ /80