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 FACIL: 50-275 Diablo Canyon Nuclear Power Plant, Unit 1, Pacific Ga 05000275
 50-323 Diablo Canyon Nuclear Power Plant, Unit 2, Pacific Ga 05000323

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PALLADINO, N. J.	Commissioners
ROBERTS, T. M.	Commissioners
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SUBJECT: Responds to Generic Ltr 85-15 re compliance w/10CFR50.49 & Reg Guide 1.97 concerning environ qualification of electric equipment important to safety. Util compliance indicates extension request unnecessary.

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JAMES D. SHIPPER
VICE PRESIDENT
NUCLEAR POWER GENERATION

September 30, 1985

PGandE Letter No.: DCL-85-315

Chairman Nunzio J. Palladino
Commissioner Thomas M. Roberts
Commissioner James K. Asselstine
Commissioner Frederick M. Bernthal
Commissioner Lando W. Zech, Jr.
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Response to Generic Letter 85-15

Dear Chairman and Commissioners:

In response to Generic Letter (GL) 85-15, PGandE has reviewed its compliance with 10 CFR 50.49, "Environmental Qualification (EQ) of Electric Equipment Important to Safety for Nuclear Power Plants." After review and discussions with the NRC Staff, PGandE has determined that an extension request is not required for Diablo Canyon Units 1 and 2. As discussed below, PGandE is in compliance with 10 CFR 50.49. Although GL 85-15 does not require a response, PGandE is providing a description of its EQ program for electric equipment important to safety for the Commission's information.

PGandE's compliance with the EQ requirements of 10 CFR 50.49 has been documented in numerous letters to the NRC Staff and in the NRC Staff's Diablo Canyon Safety Evaluation Report, Supplements (SSERs) 15, 31 and 32 (Enclosure 1). The NRC Staff concluded in SSER 31 "that the environmental qualification program is acceptable and that compliance with 10 CFR 50.49 has been demonstrated" (SSER 31, p. 4-24).

In particular, 10 CFR 50.49 requires qualification of the following three categories of equipment: (1) safety-related electric equipment; (2) nonsafety-related electric equipment whose failure could prevent satisfactory accomplishment of safety functions by safety-related equipment; and (3) certain post-accident monitoring equipment identified in Regulatory Guide (RG) 1.97. PGandE has qualified the safety-related equipment as specified in category (1), and the NRC Staff approved the qualification program in SSER 15 and SSER 31. There is no equipment at Diablo Canyon which is applicable to category (2). Qualification of equipment in category (3) as

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identified in RG 1.97 is complete, with the exception of two items which have not been installed due to the commercial unavailability of environmentally qualified equipment (Enclosure 2). PGandE has committed to install the qualified equipment when available. In SSER 32, the NRC Staff stated that PGandE's schedule for compliance with RG 1.97 is acceptable.

Accordingly, an extension request pursuant to GL 85-15 does not appear necessary at this time. This is consistent with NRC Staff guidance. The Project Manager for Diablo Canyon confirmed that those RG 1.97 items which are not required by order, license condition or technical specification to be installed or operable on or before November 30, 1985 do not require an extension under GL-85-15.

Kindly acknowledge receipt of this material on the enclosed copy of this letter and return it in the enclosed addressed envelope.

Sincerely,



Enclosures

cc: L. J. Chandler
H. R. Denton
R. T. Dodds
J. B. Martin
B. Norton
H. E. Schierling
J. M. Taylor
H. L. Thompson, Jr.
CPUC
Diablo Distribution

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ENCLOSURE 1

PGandE LETTERS AND SSERS ON
ENVIRONMENTAL QUALIFICATION AND REGULATORY GUIDE 1.97

The following list is a chronology of recent PGandE responses and associated SSERS with regard to compliance with environmental qualification requirements and Regulatory Guide 1.97:

<u>PGandE Letter Number</u>	<u>Letter Date</u>	<u>Subject</u>	
		<u>Equipment Qualification</u>	<u>RG 1.97</u>
DCL-84-298	September 4, 1984		X
DCL-84-363	November 29, 1984	X	
DCL-85-008	January 9, 1985	X	
DCL-85-024	January 25, 1985		X
DCL-85-055	February 8, 1985	X	
DCL-85-068	February 15, 1985	X	
DCL-85-072	February 22, 1985	X	X
DCL-85-088	March 1, 1985		X
DCL-85-111	March 13, 1985	X	
DCL-85-125	March 26, 1985	X	X
DCL-85-149	April 15, 1985	X	
DCL-85-204	June 6, 1985		X
DCL-85-224	June 21, 1985		X
DCL-85-243	July 18, 1985	X	X

<u>NRC SSERS</u>	<u>Date</u>	<u>Page</u>
SSER 15	September 1981	B-11
SSER 31	April 1985	4-24
SSER 32	July 1985	10-2



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ENCLOSURE 2

PGandE'S COMPLIANCE WITH
REGULATORY GUIDE 1.97 REGARDING
REQUIREMENTS FOR POST-ACCIDENT MONITORING INSTRUMENTATION

Regulatory Guide 1.97 (RG 1.97) was issued by the NRC Staff to provide guidance on the types of equipment which must be installed for post-accident monitoring. Environmental qualification is required by 10 CFR 50.49 for certain post-accident monitoring equipment installed pursuant to RG 1.97. As documented in PGandE letters DCL-85-243 and DCL-85-125, all items specified in RG 1.97 have been installed and qualified with the exception of two items. The two exceptions are a boric acid charging flow meter, and a radioactivity concentration monitor in circulating primary coolant. Environmentally qualified equipment is to perform the functions associated with these items is not currently available from any manufacturer. As RG 1.97 provides that equipment to be installed when available, PGandE is in compliance with the guidance of RG 1.97. When these items are installed, PGandE will have fully implemented the RG 1.97 requirements. The NRC Staff has reviewed and accepted PGandE's compliance with RG 1.97 as documented in SSER 32, pages 10-1 and 10-2. Further, while RG 1.97 does not require alternative means to meet functional requirements, PGandE has provided other methods to obtain such information.

The function of one of the items, the boric acid flow meter, is presently performed by a device designed and installed in DCPD nearly a decade prior to the issuance of RG 1.97 and the qualification requirements of 10 CFR 50.49; the device is not environmentally qualified. This item and its associated environmental qualification is not needed to meet other NRC requirements. The existing device was installed in a boration system to monitor desired operating information and is not relied upon for information related to plant safety or emergency operating procedures. With regard to the radioactivity monitor, PGandE has a Post-Accident Sampling System (PASS) to sample the primary coolant. This system samples a broad range of coolant activity and can provide a complete isotopic profile of the coolant. The PASS provides sufficient functional redundancy with the existing instrumentation.

PGandE has provided information to the NRC Staff stating that these two items currently cannot be qualified and has committed to install these items during the first refueling outage following the availability and receipt of qualified items (DCL-85-243). The NRC Staff accepted PGandE's implementation of RG 1.97 in SSER 32, p. 10-2. Accordingly, PGandE is in compliance with RG 1.97. Additionally, the NRC Staff's review in SSER 31 concludes that the environmental qualification program is acceptable and that compliance with 10 CFR.40.49 has been demonstrated.



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