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Honorable Nunzio J. Palladino
Chairman
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Dr. Palladino:

SUBJECT: ACRS COMMENTS ON THE STATUS OF USI A-46 (SEISMIC QUALIFICATION
OF EQUIPMENT IN OPERATING PLANTS)

During its 304th meeting, August 8-10, 1985, the Advisory Committee on Reactor Safeguards was briefed on the status of USI A-46 (Seismic Qualification of Equipment in Operating Plants) and its proposed resolution. The briefing included presentations by representatives of the Seismic Qualification Utilities Group (SQUG) and the NRC Staff. A more detailed briefing was presented to the ACRS Subcommittee on the Qualification Program for Safety-Related Equipment during a meeting in Washington, D.C. on August 6, 1985.

The ACRS has also had the benefit of previous briefings on the status of USI A-46 during its 279th meeting, July 7-9, 1983, and during its 289th meeting, May 10-12, 1984. On each occasion we endorsed the approach being pursued by the NRC Staff in conjunction with the SQUG, and in our May 16, 1984 letter offered comments concerning Task 4 (Seismic Qualification of Equipment Using Seismic Experience Data).

USI A-46 applies to all nuclear plants not licensed under current seismic qualification requirements as defined in Regulatory Guide 1.100, IEEE Standard 344-1975 and Standard Review Plan 3.10. We believe that the resolution to USI A-46, as currently proposed by the NRC Staff, adequately addresses the issue of seismic qualification in operating plants to which it applies.

We also believe the technique of using actual experience data in the seismic qualification of equipment has considerable merit, and we suggest that the NRC Staff study the feasibility of applying the knowledge gained, when this may be relevant, to the resolution of new seismic qualification issues as they arise.

We will continue to follow the status of this issue and intend to review and comment on the final proposed resolution following the public comment phase.

Sincerely,

David A. Ward
Chairman

