



Commonwealth Edison
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IE HQ FILE COPY

June 3, 1983

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Dresden Station Units 2 and 3
Quad Cities Station Units 1 and 2
Zion Station Units 1 and 2
LaSalle County Station Units 1 and 2
Byron Station Units 1 and 2
Braidwood Station Units 1 and 2
Interpretation of 10 CFR 50.49(L)
NRC Docket Nos. 50-237/249, 50-254/265,
50-295/304, 50-373/374, 50-454/455, and
50-456/457

Reference (a): D. G. Eisenhut letter to All Licensees
and Applicants dated April 20, 1982
(Generic Letter No. 82-09)

Dear Mr. Denton:

The purpose of this letter is to point out the contradictory statements made between the Final Rule 10 CFR 50.49 "Environmental Qualification of Electrical Equipment Important to Safety for Nuclear Power Plants" and the "Nature and Scope of the Rulemaking" as noticed in 48 FR 2730, 1-21-83, and to express the Commonwealth Edison Company interpretation as to whether replacement equipment or replacement parts must be qualified to the standards set forth in Category I of NUREG-0588 and IEEE 323-74.

In particular, 10 CFR 50.49(L) states: "Replacement equipment must be qualified in accordance with the provisions of this section unless there are sound reasons to the contrary", whereas 48 FR 2730, 1-21-83 "Nature and Scope of the Rulemaking" states: "In CLI-80-21, the Commission stated that unless there were sound reasons to the contrary, replacement parts should be qualified to the standards set forth in Category I of NUREG-0588 or IEEE 323-74. The Commission reaffirms that position in this rulemaking."

We believe that the intent of the rulemaking was to require an upgrade program for replacement equipment and not replacement parts. It should be noted that Reference (a) Generic Letter No. 82-09 addresses replacement equipment and not replacement parts

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which is consistent with our understanding. Based upon our interpretation of the requirements, the following Commonwealth Edison replacement programs have been implemented:

1. Like-for-like parts are used to maintain presently installed qualified equipment whether this equipment is qualified to the DOR Guidelines or to NUREG-0588 Category I or Category II. When identical parts are not available, an engineering analysis is performed to ensure the replacement part is of as good or better quality as the original. This practice ensures the continued qualification of installed equipment.
2. When presently installed equipment qualified to the DOR Guidelines or to NUREG 0588 Category II must be replaced, every effort is made to replace it with equipment qualified to NUREG 0588 Category I. Sound reasons to the contrary, as defined in Generic Letter 82-09, may preclude this upgrading practice when deemed necessary on a case by case basis.

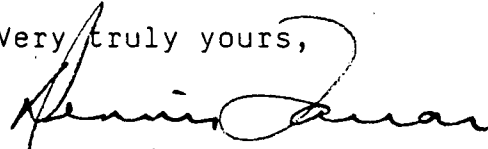
Our replacement programs are based on both sound engineering and maintenance principles. Moreover, these programs are manageable which is significant in regards to the like-for-like program for replacement parts.

In contrast, a program to upgrade the qualification level of parts would be most difficult, and in our judgement, nearly impossible to manage. This is primarily due to the fact that equipment is normally qualified and not their sub-parts. Parts are inherently qualified to the same level as the equipment because they form an integral part of the entire assembly. We believe that it would be most difficult to merely determine if a part had been qualified to a higher level in some other piece of equipment or in some other separate qualification program. Additionally, the associated problems with ordering and stocking these alternate parts would further complicate our maintenance practices without any concomitant increase in plant safety.

We hereby request the NRC Staff review of this matter and written concurrence or comment concerning our interpretation and implementation of the 10 CFR 50.49(L) requirements. Please address any questions that you or your staff may have concerning this matter to this office.

One (1) signed original and forty (40) copies of this letter are provided for your use.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Dennis L. Farrar".

Dennis L. Farrar
Director of Nuclear Licensing

Attachments

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cc: J. G. Keppler, RIII

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