

Docket No. 50-336

Environmental Qualification
of
Safety Related Electrical Equipment

Northeast Nuclear Energy Company

Millstone Unit No. 2

May 20, 1983

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Docket No. 50-336

Northeast Nuclear Energy Company

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Attachment 1

Chronology and References

May 20, 1983

ENVIRONMENTAL QUALIFICATION OF
ELECTRICAL EQUIPMENT

MILLSTONE UNIT NO. 2

CHRONOLOGY AND REFERENCES

- (1) February 8, 1979 B. H. Grier letter to W. G. Council transmitting I&E Bulletin No. 79-01.
- (2) March 23, 1979 W. G. Council letter to R. W. Reid identifying unqualified SMLS.
- (3) April 6, 1979 W. G. Council letter to R. W. Reid identifying qualified SMLS to be installed prior to Cycle 3 startup.
- (4) April 18, 1979 W. G. Council letter to R. W. Reid identifying unqualified solenoid operating valves will have qualified solenoids by Cycle 3 startup.
- (5) May 8, 1979 W. G. Council letter to R. W. Reid identifying SMLS on Valves S1-G14, G24, G34, and G44 will not be replaced; justification provided.
- (6) June 6, 1979 B. H. Grier letter to W. G. Council transmitting I&E Bulletin No. 79-01A, regarding ASCO solenoid valves.
- (7) June 6, 1979 W. G. Council letter to N. C. Mosely transmitting response to I&E Bulletin No. 79-01.
- (8) September 4, 1979 W. G. Council letter to N. C. Mosely transmitting additional information in response to I&E Bulletin No. 79-01, June 6, 1979 letter.
- (9) September 5, 1979 W. G. Council letter to R. W. Reid identifying unqualified RTS's in containment - continued operation justified.
- (10) September 19, 1979 W. G. Council letter to R. W. Reid submitting followup report on September 5, 1979 letter.
- (11) January 9, 1980 W. G. Council letter to B. H. Grier transmitting response to I&E Bulletin No. 79-28/Defective Gaskets in NAMCO SMLS.

Environmental Qualification of
Electric Equipment
Millstone Unit No. 2
Page 2

- (12) January 14, 1980 B. H. Grier letter to W. G. Council transmitting I&E Bulletin No. 79-01B.
- (13) January 18, 1980 W. G. Council letter to N. C. Mosely transmitting update to original I&E Bulletin No. 79-01 response -additional information.
- (14) February 29, 1980 B. H. Grier letter to W. G. Council transmitting Supplement to I&E Bulletin No. 79-01B.
- (15) March 3, 1980 W. G. Council letter to B. H. Grier transmitting response to Items 1 - 3 to I&E Bulletin No. 79-01B.
- (16) March 31, 1980 W. G. Council letter to B. H. Grier transmitting update to March 3, 1980 letter, Items 1 - 3 of I&E Bulletin No. 79-01B.
- (17) April 17, 1980 W. G. Council letter to B. H. Grier transmitting update of original response to I&E Bulletin No. 79-01B, March 3, 1980 letter.
- (18) May 23, 1980 Commission issues Memorandum and Order requiring SER's by February 1, 1981 and total compliance by June 30, 1982.
- (19) July 14, 1980 NNECO representatives attend Region I clarification meeting.
- (20) July 16, 1980 W. G. Council letter to B. H. Grier update to original response to I&E Bulletin No. 79-01B, March 3, 1980 letter, addressing commitments made in the April 17, 1980 letter.
- (21) August 26, 1980 R. T. Carlson letter to W. G. Council discussing audit findings on selected components.
- (22) August 29, 1980 R. A. Clark letter to W. G. Council transmitting the Order for Modification of License requiring a response by November 1, 1980.
- (23) September 10, 1980 W. G. Council letter to B. Wolfe (GE) requesting expedited response regarding qualification documentation.

Environmental Qualification of
Electrical Equipment
Millstone Unit No. 1
Page 3

- (24) September 19, 1980 D. G. Eisenhower letter to W. G. Council transmitting Revised Order for Modification of License.
- (25) September 30, 1980 NRC issues Supplement 2 to I&E Bulletin No. 79-01B.
- (26) October 1, 1980 D. G. Eisenhower letter to All Licensees of Operating Plants and Applicants for Operating Licenses and Holders of Construction Permits requesting pertinent information relative to environmental qualification testing.
- (27) October 9, 1980 W. G. Council letter to J. Blachly (Siemens-Allis, Incorporated) requesting expedited response regarding qualification documentation.
- (28) October 14, 1980 R. T. Carlson letter to W. G. Council discussing findings of audit regarding comparison of qualification documentation to plant components.
- (29) October 20, 1980 NNECO representative responds to request of NRC Project Manager to provide status of the response to the Order.
- (30) October 24, 1980 B. H. Grier letter to W. G. Council transmitting Supplement 3 to I&E Bulletin No. 79-01B.
- (31) October 24, 1980 R. A. Clark letter to W. G. Council transmitting an immediately effective order regarding modifications to the license and Technical Specifications.
- (32) October 31, 1980 W. G. Council letter to D. G. Eisenhower providing information, SCEW sheets, and qualification references fulfilling the requirements issued by the Order of Reference (22).
- (33) November 26, 1980 D. G. Eisenhower letter to W. G. Council, Generic Clarification of Documentation required which is associated with Central Qualification file.

Environmental Qualification of
Electrical Equipment
Millstone Unit No. 2
Page 4

- (34) December 4, 1980 W. G. Council letter to H. R. Denton requesting a hearing on the Order issued by Reference (31).
- (35) January 16, 1981 D. G. Eisenhut letter to W. G. Council holding hearing request in abeyance.
- (36) January 19, 1981 D. G. Eisenhut letter to All Licensees clarifying Bulletin 79-01B requirements.
- (37) January 20, 1981 W. G. Council letter to D. G. Eisenhut identifying the lack of planned Environmental Qualification testing.
- (38) January 30, 1981 W. G. Council letter to D. G. Eisenhut concurring with 30 day holding of hearing request.
- (39) January 30, 1981 W. G. Council letter to D. G. Eisenhut updating October 31, 1980 submittal.
- (40) March 10, 1981 D. G. Eisenhut to all plants; staff position that summary qualification reports not adequate.
- (41) April 14, 1981 B. H. Grier to W. G. Council transmitting Circular 81-06; potential deficiencies in Foxboro transmitters.
- (42) April 14, 1981 T. M. Novak to W. G. Council; 10 day letter requiring justification of continued operation in light of potential deficiencies.
- (43) April 30, 1981 W. G. Council to T. M. Novak; providing justification for continued operation in 10-day response.
- (44) May 27, 1981 R. A. Clark letter to W. G. Council; transmitting the SER, for review and 90 day response.
- (45) June 4, 1981 W. G. Council to Hendrie requesting extension of June 30, 1982 deadline.
- (46) June 12, 1981 D. G. Eisenhut to W. G. Council allowing 90 days for hearing request after date of issuance of SER.

Environmental Qualification of
Electrical Equipment
Millstone Unit No. 2
Page 5

- (47) June 22, 1981 :..... Industry Petition for extension of
deadline for compliance with CLI-80-21.
- (48) June 26, 1981 W. G. Council letter to D. G. Eisenhut,
commenting on anticipated usefulness of
July 7 - 10 meeting.
- (49) June 29, 1981 NRC response to industry petitions
postponing recommendation until July
31, 1981.
- (50) July 16, 1981 W. G. Council letter to H. R. Denton
providing feedback on July 7 - 10
environmental qualification meeting.
- (51) July 31, 1981 Staff position to the Commission
recommending one year extension to the
June 30, 1982 deadline.
- (52) August 14, 1981 W. G. Council letter to D. G. Eisenhut
documenting position on qualification
of replacement parts.
- (53) August 14, 1981 D. G. Eisenhut letter to W. G. Council
proposing additional delay on
affirmation or withdrawal of pending
requests.
- (54) August 20, 1981 W. G. Council letter to D. G. Eisenhut,
accepting Staff proposal of Reference
(53) regarding pending hearing
requests.
- (55) August 26, 1981 W. G. Council letter to D. G. Eisenhut,
discussing status of SER responses and
providing overview of NNECO perspective
on environmental qualification.
- (56) August 26, 1981 W. G. Council to D. G. Eisenhut
submitting the 90-day response to the
Staff's SER.
- (57) August 27, 1981 I & E Information Notice 81-29
regarding adverse test results.
- (58) September 30, 1981 W. G. Council to D. G. Eisenhut
providing minor editorial changes to
Reference (56).

Environmental Qualification of
Electrical Equipment
Millstone Unit No. 2
Page 6

- (59) December 8, 1981 W. G. Council to R. C. Haynes, fulfilling commitments made in Reference (55) regarding resistance temperature detectors.
- (60) January 6, 1982 R. A. Clark letter to W. G. Council requesting that additional information be provided to FRC.
- (61) January 20, 1982 Federal Register notice (47FR2876) on a proposed rule regarding Environmental Qualification of Electrical Equipment.
- (62) February 9, 1982 W. G. Council letter to D. M. Crutchfield and R. A. Clark forwarding material requested in Reference (60).
- (63) February 10, 1982 W. G. Council letter to the Secretary of the Commission providing schedular comments on the proposed rule of Reference (61).
- (64) February 18, 1982 R. A. Clark letter to W. G. Council requesting submittal of certain reference information.
- (65) February 22, 1982 47FR7782: Proposed Revision I to Reg. Guide 1.89: Environmental Qualification of Electric Equipment for Nuclear Power Plants.
- (66) March 4, 1982 R. C. Haynes letter to all licensees transmitting Information Notice 82-03: "Environmental Tests of Electrical Terminal Blocks."
- (67) March 22, 1982 W. G. Council letter to Secretary of the Commission commenting on the Proposed revision to Reg. Guide 1.89.
- (68) May 13, 1982 W. G. Council letter to R. C. DeYoung providing notification of a Substantial Safety Hazard.
- (69) June 30, 1982 Federal Register Notice (28363) suspending the June 30 deadline for completion of Environmental Qualification of Safety Related Electrical Equipment by all operating nuclear power plants.

Environmental Qualification of
Electrical Equipment
Millstone Unit No. 2
Page 7

- (70) July 1, 1982 W. G. Council letter to R. A. Clark submitting qualification information requested in Reference (64).
- (71) July 12, 1982 C. J. Crane (Franklin Research Center) letter to NRC stating that Millstone Unit No. 2 has provided (via Reference 70)) the information requested by Reference (64).
- (72) December 29, 1982 W. G. Council to R. A. Clark updating information on TMI Item II.F.1.5.
- (73) January, 1983 Union of Concerned Scientists (Petitioner) vs NRC and the USA (Respondents), and NUGEQ (Intervenor), Brief for Respondents on Petition for Review of a Final Rule on the NRC.
- (74) January 21, 1983 Federal Register, 48FR2729 issuing final rule on Environmental Qualification.
- (75) February 18, 1983 Union of Concerned Scientists (Petitioner) vs NRC, et. al. (Respondent), NUGEQ (Intervenor), Petition for Review of a Rule of the NRC, Brief for Intervenor Nuclear Utility Group on Equipment Qualification.
- (76) February 22, 1983 W. G. Council letter to D. G. Eisenhower confirming date by which a determination must be made on a hearing request.
- (77) March 7, 1983 NUGEQ (Petitioner) vs NRC (Respondent), Petition for Review.
- (78) March 18, 1983 W. G. Council letter to R. A. Clark and D. M. Crutchfield formally advising the Staff of NU's interpretation of the Final Rule on Environmental Qualification.
- (79) March 24, 1983 W. G. Council letter to D. G. Eisenhower conditionally withdrawing NU's request for a hearing.

Environmental Qualification of
Electrical Equipment
Millstone Unit No. 2
Page 8

- (80) March 28, 1983 W. G. Council letter to R. A. Clark and D. M. Crutchfield reestablishing a submittal date for certain qualification information.
- (81) April 6, 1983 R. A. Clark letter to W. G. Council transmitting FRC's Technical Evaluation Report (TER).
- (82) April 25, 1983 W. G. Council letter to R. A. Clark submitting 30-day response to Reference (74).
- (83) April 15, 1983 W. G. Council letter to D. G. Eisenhut submitting NNECO's response to items of Generic Letter 82-33, (Supplement 1 to NUREG-0737).
- (84) May 18, 1983..... W. G. Council letter to R. A. Clark and D. M. Crutchfield, amending operating license DPR-65 incorporating revised Technical Specifications.

A. INTRODUCTION AND CHRONOLOGY

Northeast Nuclear Energy Company (NNECO) was initially requested to address the issue of environmental qualification of electrical equipment for Millstone Unit No. 2 in the form of a docketed response by Reference (1). In accordance with the provisions of Item 4 of Reference (1), References (2) through (5) were submitted to notify the Commission that certain stem mounted limit switches were lacking the requisite qualification, and identified corrective action and justification for continued operation.

By Reference (6), the NRC issued I&E Bulletin No. 79-01A, regarding ASCO solenoid valves. NNECO's initial response to the provisions of Items 1 through 3 of Reference (1) was docketed by Reference (7) and supplemented by Reference (8). References (9) and (10) were submitted in conformance with Item 4 of Reference (1) and discussed the qualification status of resistance temperature detectors used to monitor containment air temperatures. Justification for continued operation was provided. Reference (11) docketed a response to I&E Bulletin No. 79-28 regarding NAMCO stem-mounted limited switches.

The issue of environmental qualification was escalated to a higher priority status upon issuance of Reference (12). An indication of the magnitude of this task can be obtained by reviewing the attached chronology. It is important to recognize that NNECO resources have been strained significantly, not merely because of the amount of equipment requiring qualification documentation, but also because of the numerous changes and conflicts in NRC guidance documents on this subject. To support this position, the attached chronology is discussed to specify instances where such conflicts have arisen and to identify the applicability of these reference documents as of this writing.

Supplemental information in the form of System Component Evaluation Work Sheets (SCEWS) was provided in Reference (13). For each component, information in the form of component description, description of the accident environment, the environment to which the equipment is qualified, the manner of qualification, and the identification of the specific supporting qualification documentation was provided. Resolution of the issues identified in Reference (6) was also provided by Reference (13).

The first supplement to Reference (1) was issued by Reference (14). The supplemental information was presented in the form of seventeen (17) generic questions and answers. Of particular significance was the response to Question 5, in which the Staff stated that TMI lessons-learned equipment was not to be addressed. The response to Question 9 is also of significance as the Staff states that the requirements and positions in NUREG-0588 are the same as those in NUREG-0578 in relation to

environmental qualification of electrical equipment and components. The response to Question 18 of Reference (25) discusses the differences between NUREG-0588 and NUREG-0578 regarding the calculation of radiation source terms.

By Reference (15), (16), and (17), NNECO responded to the specific provisions of Reference (12). The equipment qualification status, which is superseded by the docketing of Appendix II to this report, was presented to the extent it was available at that time. Reference (15) provided information regarding the radiation service conditions and temperature and pressure profiles which remain applicable as shown in Appendix II.

In Reference (18), the Commissioners issued the Memorandum and Order, and required the NRC Staff to issue Safety Evaluation Reports by February 1, 1981. It is NNECO's intention that the report will be the foundation for a favorable SER.

During the regional meetings on this subject (Reference (19)), additional changes in NRC requirements or new interpretations were provided. The Staff explained that there was no longer a need to address areas of the plant which remain at ambient conditions. The Staff also discussed the various qualification methods which are acceptable, and these included evaluation, analysis, and similarity considerations. Subsequent to the meeting, NNECO endeavored to restructure the program to respond to the new guidance.

By Reference (20), supplemental information to Reference (17) was provided. Commitments made in Reference (17) were fulfilled or new schedules were established.

The results of a corporate office audit conducted by the Office of Inspection and Enforcement were documented in Reference (21). No items of noncompliance were identified during the 16-hour verification inspection.

In Reference (22), the Staff issued the Order for Modification of License and required a response by November 1, 1980. Although eventually superseded by Reference (24), the principle purpose of this report is to respond to Reference (22).

NNECO has encountered numerous difficulties in obtaining some of the necessary qualification documentation. Several vendors are no longer in business supplying components for nuclear applications, others are no longer in existence, and still others express great reluctance in providing the requested data. Postulated reasons include difficulties in retrieval or commercial considerations. In attempting to deal with this dilemma, NNECO has resorted to letters such as References (23)

and (27) to expedite receipt of the necessary information. Although such efforts have been helpful, they have not resolved a remaining difficulty in obtaining the required qualification documentation.

In Reference (25), the Staff clarified its position on a number of requirements and escalated the scope of the review effort significantly. NNECO's exceptions and positions with respect to the requirements of this document were discussed in the forwarding letter. NNECO reemphasizes that extreme difficulties are encountered when the NRC issues documents which revise the scope of a major effort which are required by order to be submitted merely one month from the issuance of Reference (25).

By Reference (26), The Staff requested pertinent information regarding environmental qualification tests to be conducted within the next two years. We are endeavoring to supply the requested information, but did not receive this document until Tuesday, October 14, 1980. The current work load on individuals involved in environmental qualification will likely preclude a complete response by November 1, 1980, but NNECO intends to respond as soon as possible. No plans for qualification testing for NNECO have been identified as of this writing.

Reference (28) documents the results of a site audit conducted by the Office of Inspection and Enforcement. No items of non-compliance were identified. A response is provided as Appendix III to this report.

Reference (29) identifies a call between NNECO representatives and the NRC Project Manager for Millstone Unit No. 2 regarding the status of the response to the Order. The questions posed were suggestive of potential for changes/relaxations in certain portions of NRC requirements. The responses provided by NNECO are intended to demonstrate its continued position that the purpose of this effort is to demonstrate the adequacy of the current qualification status of safety-related electrical equipment, which is possible even if certain provisions of the qualification requirements cannot be fulfilled by documentation.

By Reference (30), the Staff transmitted Supplement 3 to I&E Bulletin No. 79-01B. This document delayed the schedule for submittal of all qualification documentation regarding TMI Action Plan equipment until February 1, 1981. Similarly, the qualification information for equipment required to achieve and maintain a cold shutdown condition is not required until February 1, 1981. NNECO's position regarding these changes is being provided now and will be supplemented by February 1, 1981.

By Reference (31), NNECO received an immediately effective Order which modified the license and the Technical Specifications. June 30, 1982 has been established in the license as the date by

which fully qualified safety-related electrical equipment must be installed. By December 1, 1980, NNECO must establish complete and auditable records and maintain them at central locations. Steps are being taken to comply with these requirements on schedule.

By Reference (32) NNECO provided information requested in Reference (24), consisting of qualification information for safety-related electrical equipment and accordance with the Commission's guidance in this matter. Where total qualification was not incorporated into this report, justification for continued operation until total conformance could be achieved was provided.

In Reference (33), D. G. Eisenhut addressed clarification of the October 24, 1980 Orders to all Licensees. The provision of the Orders requiring centrally located records did not call for creation of any records, per se, but the existence of a system which contained a complete set of documentation on Environmental Qualification.

Reference (34) requested that a hearing be held to determine the validity of NUREG-0588 requirements, specifically the requirement of meeting the June 30, 1982 deadline for qualification of all safety-related electrical equipment.

Reference (35), D. G. Eisenhut informed W. G. Council that the Commission intended to hold the Reference (34) hearing request in abeyance until 30 days after the issuance of the SERs for our facilities, thus, providing the option of reviewing the Safety Evaluations while still preserving our ability to seek a hearing. A response regarding the acceptability of this approach was requested by January 30, 1981.

Reference (36), from D. G. Eisenhut to all Licensees, provided information in response to licensee requests regarding certain requirements of Bulletin 79-01B, the Reference (18) memorandum, and the Reference (30) Order.

In Reference (37), W. G. Council informed D. G. Eisenhut that there are no plans for environmental qualification testing that are applicable to Millstone Unit No. 2.

Reference (38) forwarded W. G. Council's acceptance of D. G. Eisenhut's proposal to hold our hearing request in abeyance for 30 days following the issuance of the Safety Evaluations for our facilities with the qualification that the 30 days be counted as after the receipt of the last of the Safety Evaluation Reports for the three operating units in the NU System.

Reference (39) updated the Reference (32) submittal, providing updated SCEW sheets, a revised index listing all safety-related electrical equipment, and additional or replacement pages for

the Master Listing of Electrical Components. This submittal focused on equipment required exclusively to achieve cold shutdown, but did not totally reflect the Staff guidance contained in Reference (36).

Reference (40) forwarded D. G. Eisenhut's letter to all licensees, clarifying the NRC Staff requirements for a detailed explanation of test procedures and the results thereof. These detailed reports on Environmental Qualification of Class IE Electrical Equipment would be then considered proprietary.

Reference (41) (Circular 81-06) contained information on certain Foxboro 10-to-50 Milliampere Transmitters. Licensees were advised of the improper use of Teflon wire insulation and an unsuitable capacitor in the amplifier section of these transmitters.

In Reference (42), T. M. Novak transmitted the preliminary results of the Staff review of environmental qualification of safety-related electrical equipment in Millstone Unit No. 2. The Staff review resulted in the alleged identification of a number of potential deficiencies such that conformance to DOE guidelines could not be demonstrated. NNECO was required to respond within ten days, providing justification for continued operation in light of these alleged deficiencies.

Reference (43), W. G. Council provided the required justification for continued operation, pointing out a number of specific concerns with the content of Reference (42). NNECO suggested that the current status of the Staff's SER did not accurately reflect the qualification status of electrical equipment at Millstone Unit No. 2 and that the subject concerns should be evaluated in detail prior to the issuance of the final SER.

Reference (44) transmitted the Safety Evaluation Report (SER). The NRC Staff identified the information required, and the actions necessary to comply with Reference (31). NNECO was given the option of presenting alternatives to staff positions, however, all information was requested to be provided within 90 days. NNECO has encountered difficulties in discerning the bases for the alleged deficiencies in many instances.

In Reference (45), W. G. Council informed D. J. Hendrie of the substantial amounts of manpower and resources already expended on environmental qualifications, and that licensee evaluations found the NRC Staff requirements for a June 30, 1982 deadline for full compliance neither appropriate, realistic, nor attainable. NNECO requested relief from the June 30, 1982 deadline, in the form of extensions to a minimum of seventeen

months after SER issuance. Other issues mentioned were equipment in mild environments, replacement parts, aging requirements, and containment profiles. This document was subsequently appended to Reference (49).

In Reference (46), D. G. Eisenhut informed W. G. Council of the Staff's decision to extend the 30-day abeyance period granted in Reference (34) to 90 days. Within 90 days of the issuance of the SER for Millstone Unit No. 2, NNECO was requested to inform the Staff of its intentions regarding the hearing request of Reference (34), and of the specific issues to be raised in the proceeding.

In Reference (47), the law firm of Debevoise and Liberman filed a petition on behalf of 20 licensees seeking a thirteen month extension of the June 30, 1982 deadline established by CLI-80-21. The petition stated that few, if any, licensees could meet the deadline, and that the assumptions upon which CLI-80-21 was based have proven to be significantly understated in terms of the length of time needed for compliance.

Reference (48) informed the Staff that NNECO planned to have representatives present at the July 7 - 10, 1981 meeting on environmental qualification. Based upon speculation regarding the results of the meeting, NNECO also intended to propose dates for licensee-specific meetings on this issue.

Reference (49) informed the 20 petitioning licensees that the NRC Staff intended to postpone its decision on the Reference (47) petition until after the July 7 - 10, 1981 meeting on environmental qualification. Based upon speculation regarding the results of the meeting, NNECO also intended to propose dates for licensee-specific meetings on this issue.

Reference (49) informed the 20 petitioning licensees that the NRC Staff intended to postpone its decision on the Reference (47) petition until after July 7 - 10, 1981 meeting. NNECO had no objection to this course of action.

Reference (50) provided feedback on the July 7 - 10, 1981 meeting on environmental qualification. NNECO had a total of seven representatives in attendance at this meeting. While the meeting was of some benefit, additional dialogue on a plant-specific basis was determined to be necessary to resolve the numerous remaining questions. Specific comments on the meeting were provided as an attachment. General comments regarding resource expenditures adequacy and correctness of the SER, discrepancies between the SER and the TER, mild environments, and the June 30, 1982 deadline were also provided.

In Reference (51), the NRC Staff responded to the Reference (47) petition, recommending a one-year extension of the deadline to the Commission. Other options were discussed, but a one year extension was recommended. Additional extensions of time could be authorized by the Director, Division of Licensing, on a case-by-case basis for good cause shown.

Reference (52) established a written position on qualification of replacement parts to the provisions of NUREG-0588. NNECO stated that "sound reasons" for use of equipment lacking full qualification existed in numerous instances, and that such reasons are documented in the central qualification file.

Reference (53) forwarded D. G. Eisenhut's letter to W. G. Council proposing an additional delay in the Reference (37) hearing request, to allow NNECO to consider all recent or imminent developments. The staff expressed its intention to continue to pursue resolution of disputed technical issues.

In Reference (54), NNECO concurred with the Reference (53) proposal, agreeing to inform the Staff of NNECO's decision on the hearing request within 30 days of Commission disposition of the industry petition.

Reference (55) provided an overview of the environmental qualification issue in light of recent developments. The preferred methods to achieve resolution of disputed technical issues were discussed.

In Reference (56) W. G. Council provided a detailed synopsis of progress achieved to date toward meeting Environmental Qualification requirements docketing a detailed response to the Safety Evaluation Report for Millstone Unit No. 2 within the allotted 90 days; and demonstrating conclusively that continued operation of Millstone Unit No. 2 is consistent with public health and safety considerations.

Reference (57) R. C. Haynes to All Licensees, transmitted I&E Information Notice 81-29, which identifies adverse test results from testing of equipment, some of which were related to Environmental Qualification. The Staff does not require reporting of adverse test results, but pointed out that in some cases such results could be reportable under provisions of 10CFR50 or license requirements.

Reference (58) provided minor editorial changes to Reference (56).

In Reference (59) W. G. Council informed R. C. Haynes that NNECO would meet commitments made in Reference (55) by taking action to ensure continued reliable operation of existing RTD's at Millstone Nuclear Power Station No. 2.

In Reference (60), R. A. Clark requested that additional information be forwarded to the NRC's contractor, Franklin Research Center, to facilitate the review of the NNECO 90-day response on Environmental Qualification.

Reference (61) consists of a Federal Register notice (47FR2876) on proposed rulemaking regarding Environmental Qualification. The proposed rule would clarify the Commission's requirements and codify methods of qualification currently contained in national standards, regulatory guides, and certain NRC publications.

Reference (62) provided the material requested in Reference (60) to FRC, noting that much of the information is considered to be proprietary and also that much of it had been provided previously. Compliance with the intent and spirit of the Paperwork Reduction Act was also questioned.

W. G. Council submitted comments to the proposed rule on Environmental Qualification in Reference (63). Mr. Council supported Chairman Pallidino's concept of a revised deadline, also contending that the second refueling outage commencing after March 31, 1982 constituted an achievable deadline. Commissioner action on the schedule, independent of the technical requirements of the rule, was recommended.

In Reference (64), R. A. Clark requested that additional information on TMI Action Plan items included in NNECO's EQ central file be sent to FRC to facilitate their review of NNECO's 90-day EQ submittal. This information includes identification of all TMI Action Plan equipment installed as of January 1, 1981, all equipment with implementation dates after January 1, 1981, and numerous other items, many of which were previously submitted to the NRC.

Reference (65) consists of a Federal Register Notice (47FR7782) on the proposed Revision 1 to Regulatory Guide 1.89, "Environmental Qualification of Electric Equipment for Nuclear Power Plants." The proposed Revision 1 would describe procedures that would be acceptable to the NRC Staff for complying with the proposed regulations in Reference (61).

Reference (66) R. C. Haynes to all Licensees, transmitted I&E Information Notice 82-03 which reported results from tests conducted on electrical terminal blocks by Sandia Laboratories. The test results indicated that certain terminal blocks exhibited leakage currents when exposed to a chemical/steam environment. Although the Staff did not require action on this topic, it did note that licensees should assure that their preventative maintenance program considers the effect of maintenance activity in the cleanliness and integrity of

electrical terminations and terminal blocks.

Reference (67) submitted W. G. Council's comments on the Proposed Revision 1 to Regulatory Guide 1.89 (Reference (65)). Mr. Council noted that the proposed revisions did not recognize the adequacy of previously submitted evaluations and documentations. Additionally, the revision would impose new costs and obligations on utilities without establishing a basis for these costs and obligations. The proposed revisions had stated that "... no new costs or obligations ... (would be placed) on utilities."

Reference (68) provided notification to the Staff of the existence of a Substantial Safety Hazard (SSH) at Millstone Units 1 and 2. Two radioactive gas monitors were found to have unacceptable sensitivities in an input range of radioactive energies expected following an accident. The gas monitor supplier (Kaman) stated he will rectify the problem.

Reference (69) consists of a Federal Register Notice (47FR28363) which suspends the previously imposed June 30, 1982, deadline for completion of Environmental Qualification. The rule in 47FR28363 is to remain in effect until the NRC supersedes 10CFR50.49 with the Final Environmental Qualification rule.

Reference (70) provided the environmental qualification and TMI Action Plan information requested by Reference (64). Our submittal identified TMI Action Plan equipment installed as of January 1, 1981, and noted that some of the requested information had been previously submitted to the FRC on numerous occasions.

Reference (71), from the FRC to the NRC, acknowledged that NNECO had provided (via Reference (70) and numerous past submittals) the information requested by Reference (64).

Reference (72) updated the status of qualification testing on TMI item II.F.1.5, and provided NNECO's schedule for submittal of test reports.

In Reference (73) Petitioner, Union of Concerned Scientists, challenges U.S. NRC's Final Rule on Environmental Qualification suspending the June 30, 1982 deadline by which operators of nuclear power plants were to show that certain safety-related electrical equipment would operate under adverse conditions, (47FR28363).

In Reference (74) the NRC issued the Final Rule on Environmental Qualification of safety related electrical equipment, codifying methods and criteria to meet the Commissions requirements in this area.

In Reference (75) NUGEQ (intervenors) statement of support for NRC's position on interim rule on environmental qualification.

In Reference (76), W. G. Council re-affirmed Northeast Utilities' intention of making a determination on a hearing request by March 24, 1983.

In Reference (77) NUGEQ (Petitioner) vs NRC (Respondent), petition to review the final rule on Environmental Qualification, 10CFR50.49.

Via Reference (78) W. G. Counsil advised the NRC staff that NNECO interprets the Final Rule on Environmental Qualification of Electric Equipment Important to Safety for Nuclear Power Plants as superseding the 90-day responses requested in Reference (80). Additionally, schedules for the completion of qualification of electric equipment will be submitted by May 20, 1983.

Reference (79) withdraws NNECO's request for a hearing, based on certain interpretations of the final rule.

Reference (80) deferred submittal of documentation of qualification information for several weeks due to a determination that the vendor-supplied information was incomplete.

Reference (81), transmitted the Franklin Research Centers' TER for Millstone Unit 2, and the NRC's SER. Several items required responses on a 30 and/or 90 day schedule.

In Reference (82), NNECO provided responses to several items addressed in the Staff SER for Millstone 2 (Reference (74)). NNECO also stated that the FRC TER contains no proprietary information and it may be released for public disclosure. This submittal fulfilled the 30-day response requirement of Reference (81).

In Reference (83), NNECO provided responses to Supplement I to NUREG-0737, referred to as "basic requirements". Attachment Nos. 2 through 4 describe the current status of each of the five major areas (i.e., SPDS, CRDR, EOPs, Regulatory Guide 1.97, and ERFs) in Supplement I to revise NUREG-0737 for the Haddam Neck Plant, Millstone Unit No. 1, and Millstone Unit No. 2, respectively. Our interpretation of the implementation and qualification schedules of Supplement I to NUREG-0737 and 10CFR50.49 was provided.

In Reference (84), Revisions to the Technical Specifications were made to bring them into conformance with the Final Rule on Environmental Qualification, 10CFR50.49. The changes deleted the June 30, 1982 deadline date, and removed the requirement for a central qualification file.

Docket No. 50-336

Northeast Nuclear Energy Company

Millstone Unit No. 2

Attachment 2

List of Electrical Equipment Important to Safety

May 20, 1983

List of Electrical Equipment Important Safety

Column No.	Item	Description
1	SCEWS	System Component Evaluation Work Sheets - found in Attachment 4.
2	T.B.	Terminal block
	H ₂ Recomb.	Hydrogen recombiner
	Recir. Fans	Recirculation fans
	P.I.R. Fans	Post Incident Recirculation Fans
	Limit Sw.	Limit switch
	L.S. Conn.	Limit switch connector
	SOV	Solenoid operated valve
	MOV	Motor operated valve
	XMTR	Transmitter
	PP Motor	Pump motor
	MO Damper	Motor operated damper
	MCC	Motor control center
	L.S.	Limit switch
	P. Sw.	Pressure switch
	Vac. Sw.	Vacuum switch
	R.T.D. Conn.	Resistance Temperature Detector connector
	Pr. Sw.	Pressure switch
	Rad. Det.	Radiation detector
	Jct. Bx.	Junction Box
	H ₂ Anal. Rad. Mon.	Hydrogen Analyzer radiation monitor
3	Manufacturer	Self-explanatory
4	1983 TER No.	Corresponding Franklin Research Center (FRC) Technical Evaluation Report (TER) reference number
5	NRC Category	<p>I.A - Equipment Qualified</p> <p>I.B - Equipment Qualification Pending Modification</p> <p>II.A - Equipment Qualification Not Established</p> <p>II.B - Equipment Not Qualified</p> <p>II.C - Equipment Satisfies All Requirements Except Qualified Life or Replacement Schedule Justified</p> <p>III.A - Equipment Exempt from Qualification</p> <p>III.B - Equipment Not in Scope of Review</p>

IV - Documentation Not Made
Available

6 NNECO TER
Assessment

NNECO's evaluation of FRC TER
concerns

1. Refer to SER/TER Review Sheet
for justification.
2. Added qualification reference.
3. Equipment not evaluated in 1983
TER.
4. Equipment located in a mild
environment.

FACILITY: Millstone Station

UNIT: Two

DOCKET: 50-336

EQUIPMENT ENVIRONMENTAL QUALIFICATION
 QUALIFICATION STATUS OF EQUIPMENT COVERED

BY RULE 10CFR50.49

Page: 1
 Rev: 0
 Date: 5/20/83

SCEWS	Equipment Type	Manufacturer	1983 TER No.	NRC Category	Agree	Disagree	NUSCO TER ASSESSMENT		JCO Provided	Comment
							Modification Complete	Pending		
2-A	Penetration	Conax	85	I.A	X					
3-A	T.B.'s	GE	83	I.A	X					1
4-A	Cable	Anaconda	79	II.A		X				
5-A	Cable	Kerite	78	I.A	X					
6-A	Cable	Cerro	71	II.A		X				1
6-Aa	Cable	Kerite	75	I.A	X					
7-A	H ₂ Recomb.	Westinghouse	86	I.A	X					
8-A	Recir.Fans	Westinghouse	93	II.A						
9-A	P.I.R.Fans	Joy	92	II.A						
10-A	Limit Sw.	Namco	63	II.A		X				1
11-A	Limit Sw.	Namco	64	II.A		X				2

FACILITY: Millstone Station

UNIT: Two

DOCKET: 50-336

EQUIPMENT ENVIRONMENTAL QUALIFICATION
QUALIFICATION STATUS OF EQUIPMENT COVERED
BY RULE 10CFR50.49Page: 2
Rev: 0
Date: 5/20/83

SCEWS	Equipment Type	Manufacturer	1983 TER No.	NRC Category	Agree	Disagree	NUSCO TER ASSESSMENT		JCO Provided	Comment
							Modification	Pending		
12-A	L.S. Conn.	Conax	42	I.A	X					
13-A	Set Screw Conn.	Ideal	35	I.A	X					
14-A	SOV	ASCO	16	I.A	X					
15-A	SOV	ASCO	28	II.A		X				1,2
16-A	SOV	ASCO	16	I.A	X					
17-A	SOV	ASCO	-	-						3
19-A	SOV	ASCO	30	I.A	X					
20-A	SOV	ASCO	30	I.A	X					
21-A	SOV	ASCO	27	I.A	X					

FACILITY: Millstone Station

UNIT: Two

DOCKET: 50-336

EQUIPMENT ENVIRONMENTAL QUALIFICATION
 QUALIFICATION STATUS OF EQUIPMENT COVERED
 BY RULE 10CFR50.49

Page: 3
 Rev: 0
 Date: 5/20/83

SCEWS	Equipment Type	Manufacturer	1983 TER No.	NRC Category	Agree	NUSCO Disagree	TER ASSESSMENT		JCO Provided	Comment
							Modification Complete	Pending		
23-A	MOV	Limitorque	95	III.A	X					
24-A	MOV	Limitorque	5	II.A		X				1
25-A	SOV	ASCO	30	I.A	X					
27-A	XMTR	FOXBORO	45	I.B	X			X	X	
28-A	XMTR	FOXBORO	56	I.B	- - - - - Deleted - - - - -					1
29-A	XMTR	FOXBORO	56	I.B	X		X			
30-A	XMTR	FOXBORO	54	I.B	X			X	X	
31-A	XMTR	FOXBORO	45	I.B	X		X			
32-A	XMTR	FOXBORO	45	I.B	X		X			

FACILITY: Millstone Station

UNIT: Two

DOCKET: 50-336

EQUIPMENT ENVIRONMENTAL QUALIFICATION
 QUALIFICATION STATUS OF EQUIPMENT COVERED
 BY RULE 10CFR50.49

Page: 4
 Rev: 0
 Date: 5/20/83

SCEWS	Equipment Type	Manufacturer	1983 TER No.	NRC Category	NUSCO TER ASSESSMENT					JCO Provided	Comment
					Agree	Disagree	Modification		Complete Pending		
34-A	SOV	Valcor	31	II.C							
35-A	Connector	Litton	43	I.A	X						
36-A	Penetration	Conax	85	I.A	X						
37-A	Cable	Rockbestos	72	II.A		X					1
38-A	Term.Blk.	Weidm.	82	I.A	X						
1-B	Term.Blk	GE	84	I.A	X						
2-B	Cable	Gen.Cable	74	IV		X					1
3-B	Cable	Kerite	77	I.A	X						
4-B	Cable	Anaconda	80	II.A		X					1
5-B	Cable	Cerro	70	II.A		X					1
5-Ba	Cable	Kerite	76	I.A	X						

FACILITY: Millstone Station

UNIT: Two

DOCKET: 50-336

EQUIPMENT ENVIRONMENTAL QUALIFICATION
QUALIFICATION STATUS OF EQUIPMENT COVERED
BY RULE 10CFR50.49

Page: 5
Rev: 0
Date: 5/20/83

SCEWS	Equipment Type	Manufacturer	1983 TER No.	NRC Category	Agree	NUSCO TER ASSESSMENT				JCO Provided	Comment
						Disagree	Complete	Pending			
7-B	MOV	Limitorque	1	II.A		X					1
8-B	MOV	Limitorque	1	II.A		X					1
9-B	MOV	Limitorque	1	II.A		X					1
10-B	MOV	Limitorque	10	II.A		X					1
11-B	MOV	Limitorque	2	II.A		X					1
12-B	MOV	Limitorque	2	II.A		X					1
13-B	MOV	Limitorque	4	II.A		X					1
14-B	MOV	Limitorque	14	II.C		X					1
15-B	MOV	Limitorque	3	II.A		X					1
16-B	MOV	Limitorque	8	II.C		X					1

FACILITY: Millstone Station

UNIT: Two

DOCKET: 50-336

EQUIPMENT ENVIRONMENTAL QUALIFICATION
QUALIFICATION STATUS OF EQUIPMENT COVERED
BY RULE 10CFR50.49

Page: 6
Rev: 0
Date: 5/20/83

SCEWS	Equipment Type	Manufacturer	1983 TER No.	NRC Category	NUSCO TER ASSESSMENT				JCO	Comment
					Agree	Disagree	Modification.		Provided	
							Complete	Pending		
17-B	MOV	Limitorque	12	II.C		X				1
18-B	MOV	Limitorque	12	II.C		X				1
19-B	MOV	Limitorque	12	II.C		X				1
20-B	MOV	Limitorque	13	II.C		X				1
21-B	PP Motor	GE	88	II.A						
23-B	Fan Motor	Joy	89	II.A						
24-B	MO Damper	Raymond Cont.	-	-						3
25-B	PP Motor	Siemens/Allis	90	II.A						

FACILITY: Millstone Station

UNIT: Two

DOCKET: 50-336

EQUIPMENT ENVIRONMENTAL QUALIFICATION
 QUALIFICATION STATUS OF EQUIPMENT COVERED
 BY RULE 10CFR50.49

Page: 7
 Rev: 0
 Date: 5/20/83

SCEWS	Equipment Type	Manufacturer	1983 TER No.	NRC Category	NUSCO TER ASSESSMENT					JCO Provided	Comment
					Agree	Disagree	Modification				
							Complete	Pending			
26-B	PP Motor	Siemens/Allis	91	II.A							
29-B	PP Motor	GE	-	-						3	
30-B	MCC	GE	87	II.A	- - - - -	- - - - -	Deleted	- - - - -	- - - - -	4	
31-B	MCC	GE	-	-	- - - - -	- - - - -	Deleted	- - - - -	- - - - -	4	
35-B	SOV	ASCO	29	I.A	X						
36-B	XMTR	GE/MAC	48	I.B	X			X	X		
36-Ba	XMTR	GE/MAC	48	I.B	X			X	X		
40-B	SOV	ASCO	21	I.B	X		X				
40-Ba	SOV	ASCO	24	I.B	X		X				
43-B	SOV	ASCO	17	I.A	X						
46-B	SOV	ASCO	15	I.A	X						
46-Ba	SOV	ASCO	15	I.A	X						

FACILITY: Millstone Station

UNIT: Two

DOCKET: 50-336

EQUIPMENT ENVIRONMENTAL QUALIFICATION
 QUALIFICATION STATUS OF EQUIPMENT COVERED
 BY RULE 10CFR50.49

Page: 8
 Rev: 0
 Date: 5/20/83

SCEWS	Equipment Type	Manufacturer	1983 TER No.	NRC Category	Agree	NUSCO TER ASSESSMENT				JCO Provided	Comment
						Disagree	Modification		Complete		
47-B	SOV	ASCO	17	I.A	X						
49-B	L.S.	NAMCO	66	I.B		X					2
50-B	SOV	ASCO	22	I.A	X						
51-B	L.S.	NAMCO	67	I.B		X					1
52-B	SOV	ASCO	17	I.A	X						
53-B	SOV	ASCO	25	II.A		X					1
54-B	L.S.	NAMCO	65	I.B		X		X			2
55-B	L.S.	NAMCO	66	I.B	X			X			
56-B	SOV	ASCO	20	I.A	X						
57-B	L.S.	NAMCO	67	I.B		X					1
58-B	SOV	ASCO	17	I.A	X						

FACILITY: Millstone Station

UNIT: Two

DOCKET: 50-336

EQUIPMENT ENVIRONMENTAL QUALIFICATION
 QUALIFICATION STATUS OF EQUIPMENT COVERED
 BY RULE 10CFR50.49

Page: 9
 Rev: 0
 Date: 5/20/83

SCEWS	Equipment Type	Manufacturer	1983 TER No.	NRC Category	Agree	NUSCO TER ASSESSMENT				Comment
						Disagree	Modification		JCO Provided	
							Complete	Pending		
66-B	SOV	ASCO	19	I.B	X			X	X	
66-Ba	SOV	ASCO	-	-						3
67-B	P.Sw.	Custom Comp.	-	-						3
68-B	SOV	ASCO	18	I.A	X					
68-Ba	SOV	ASCO	17	I.A	X					
69-B	L.S.	NAMCO	68	I.B	X		X			
69-Ba	L.S.	NAMCO	68	I.B	X		X			
70-B	SOV	ASCO	-	-				X	X	
71-B	L.S.	NAMCO	-	-				X	X	
72-B	SOV	ASCO	26	I.B	X			X	X	

FACILITY: Millstone Station

UNIT: Two

DOCKET: 50-336

EQUIPMENT ENVIRONMENTAL QUALIFICATION
 QUALIFICATION STATUS OF EQUIPMENT COVERED
 BY RULE 10CFR50.49

Page: 10
 Rev: 0
 Date: 5/20/83

SCEWS	Equipment Type	Manufacturer	1983 TER No.	NRC Category	Agree	NUSCO TER ASSESSMENT					Comment
						Disagree	Modification		JCO		
							Complete	Pending	Provided		
83-B	MOV	Limitorque	11	II.A		X				1	
84-B	MOV	Limitorque	7	II.A		X				1	
85-B	PP Motor	Westinghouse	94	II.A							
86-B	Vac.Sw.	Custom Comp.	-	-				X	X		
89-B	MOV	Limitorque	9	II.A		X				1	
91-B	XMTR	Foxboro	47	I.B	X		X				
940B	SOV	ASCO	23	I.A	X						
95-B	SOV	ASCO	18	I.A	X						
96-B	SOV	ASCO	22	I.A	X						

FACILITY: Millstone Station

UNIT: Two

DOCKET: 50-336

EQUIPMENT ENVIRONMENTAL QUALIFICATION
QUALIFICATION STATUS OF EQUIPMENT COVERED
BY RULE 10CFR50.49

Page: 11
Rev: 0
Date: 5/20/83

SCEWS	Equipment Type	Manufacturer	1983 TER No.	NRC Category	Agree	Disagree	NUSCO TER ASSESSMENT		JCO Provided	Comment		
							Modification					
							Complete	Pending				
97-B	SOV	ASCO	22	I.A	X							
98-B	SOV	ASCO	22	I.A	X							
99-B	SOV	ASCO	22	I.A	X							
100-B	SOV	ASCO	18	I.A	X							
102-B	SOV	ASCO	18	I.A	X							
106-B	SOV	ASCO	22	I.A	X							
107-B	SOV	ASCO	22	I.A	X							
108-B	SOV	ASCO	17	I.A	X							
110-B	SOV	ASCO	18	I.A	X							
112-B	L.S.	NAMCO	68	I.B	X			X				

FACILITY: Millstone Station

UNIT: Two

DOCKET: 50-336

EQUIPMENT ENVIRONMENTAL QUALIFICATION
 QUALIFICATION STATUS OF EQUIPMENT COVERED
 BY RULE 10CFR50.49

Page: 12
 Rev: 0
 Date: 5/20/83

SCEWS	Equipment Type	Manufacturer	1983 TER No.	NRC Category	Agree	Disagree	NUSCO TER ASSESSMENT		JCO Provided	Comment
							Modification			
							Complete	Pending		
113-B	L.S	NAMCO	68	I.B	X		X			
116-B	L.S	NAMCO	68	I.B	X		X			
119-B	L.S.	NAMCO	68	I.B	X		X			
120-B	L.S.	NAMCO	68	I.B	X		X			
121-B	XMTR	FOXBORO	46	I.B	X			X	X	
122-B	Cable	Rockbestos	73	II.A		X				1
1-C	MOV	Limitorque	5	II.A		X				1
2-C	XMTR	Foxboro	45	I.B	X			X	X	
5-C	R.T.D. Conn.	Rosemount	81	I.B	X			X	X	

FACILITY: Millstone Station

UNIT: Two

DOCKET: 50-336

EQUIPMENT ENVIRONMENTAL QUALIFICATION
 QUALIFICATION STATUS OF EQUIPMENT COVERED
 BY RULE 10CFR50.49

Page: 13
 Rev: 0
 Date: 5/20/83

SCEWS	Equipment Type	Manufacturer	1983 TER No.	NRC Category	NUSCO TER ASSESSMENT			JCO Provided	Comment
					Agree	Disagree	Modification Complete Pending		
8-C	XMTR	FOX BORO	55	I.B	X		X	X	
9-C	XMTR	FOX BORO	-	-	X		X	X	
14-C	Pr. Sw.	Cust. Comp	44	I.B	- - - - - Deleted - - - - -				
15-C	Rad. Det.	General At.	34	II.A					
16-C	XMTR	GEM	57	I.B		X			2
17-C	Accelometer	B&W	33	I.B	X		X	X	
18-C	Cable	B&W	69	I.B	X		X	X	
19-C	Preamp.	B&W	32	I.B	X		X	X	
20-C	JCT.BX.	B&W	-	-			X	X	3
22-C	H ₂ Anal.Rad. Monitor	BPC	-	-					3

Docket No. 50-336

Northeast Nuclear Energy Company

Millstone Unit No. 2

Attachment 3

Index to SCEW Sheet Package

May 20, 1983

INDEXSYSTEMSCEW SHT. NO.125 VDC120 VAC4160V480V Load CentersReactor Cooling

Valve HV1060, 1062, 1064

Valve HV7311

Valve RC403, 405

Pz Heaters, Prop.

Valve RC414-417, 422-425

11-A, 20-A

95-B, 113-B

1-C

34-A, 35-A

Safety Injection & Cntmt. Spray

HPSI Pumps MP41A, B, C

LPSI Pumps MP42A & B

C.S. Pumps MP43A & B

Valve SI654, 653

Valve SI662

Valve SI651

Valve SI614

Valve SI616, 626, 636, 646

Valve SI617, 627, 637, 647

Valve SI615, 625, 635, 645

Valve HV3008, 3009

Valve HV3010, 3011

Valve HV3021, 3022

Valve SI411, 412

Valve SI652

Valve SI656

Valve SI663

Valve SI655

Valve SI624, 634, 644

Valve HV7312

Valve SI659, 660

Valve SI618, 628, 638, 648

Valve SI657

Valve SI306 (FT 306)

25-B

26-B

21-B

13-B

15-B

20-A

10-A, 23-A

8-B

9-B

7-B

83-B

89-B

16-B

24-A

13-B

15-B

13-B

10-A, 23-A

108-B, 116-B

94-B

10-A, 25-A

47-B, 47-Ba

43-B, 10-D

Chem. & Volume Cntl.

Boric Acid Pumps MP19A & B

Valve CH501, 508, 509, 514

Boric Acid Tank HTR's P141, 142, 143, 144

Valve CH512

Valve CH510, 511

84-B

Valve CH505, 198, 506
 Valve CH515, 516
 Valve CH517
 Valve CH518, 519
 Valve HV2524, 2525
 Charging Pumps MP18A, B, C
 Flush Pumps MP97A; B, C
 Valve CH192
 Volume Cntl. Tank Controls
 Valve CH504

11-A, 19-A, 102-B, 120-B
 10-A, 16-A
 10-A, 15-A
 10-A, 14-A
 10-B, 51-B, 52-B
 85-B

Feedwater

25-D

Aux. Feedwater Pumps MP9A, B
 Valve HV5275, 5276
 Valve HV5279
 Valve HV5419, 5420, 5421, 5422
 SGFPT - H5A & B
 Main Fdwtr Cntl Valve FV5268, 5269

14-B

46-B, 46-Ba

Service Water

Service Water Pumps MP5A, B, C
 Valve HV6399
 Valve HV6482
 Valve HV6489
 Valve HV6400
 Valve HV6438, 6439
 Valve HV6389, 6397
 Service Water Strainer ML1A, B, C
 Valve TV6308, 6307A, 6306, 6307B

72-B

70-B, 71-B

RBCCW

RBCCW Pumps MP11A, B, C
 Valve HV6731, 6735, 6050, 6055, 6315, 6316
 Valve HV6002, 6003
 Valve HV6013, 6014, 6011
 Valve HV6096, 6095
 Valve HV6108, 6106
 Valve HV6072, 6073, 6075, 6077
 Valve HV6080, 6084, 6088, 6092
 Valve HV6739
 Valve HV6004, 6006, 6005, 6007
 Valve HV6015, 6017, 6016, 6018, 6012

29-B

53-B, 54-B, 55-B, 56-B

11-B

12-B

96-B, 107-B

97-B, 98-B, 106-B, 112-B

Inst. & Sta. Air

Valve HV7083

99-B

Main Steam

Valve HV4218, 4222		17-B, 19-B
Valve HV4189, 4191, 4188		18-B, 20-B
Valve HV4250, 4251		57-B, 58-B
Valve HV4246, 4248		49-B, 50-B
Valve HV4217, 4221		40-B, 40-Ba
Valve HV4223, 4224 & PT-4223, 4224		36-B, 36-Ba
Valve HV4193, 4209		66-B, 66-Ba

Aux. Bldg. Ventilation

Fuel Handling Fan	MF20
Fuel Handling Damper	HV8141, 8275, 8326
E.S.F.G.D. Damper	HV8247, 8133, 8249,
D.C. Sw. Gr. Fan	MF54A & B
Batt. Rm. Exhaust Fan	MF112A & B

Ctmt. & Encl. Bldg. Vent

Cntmt. Air Fan	MF14A, B, C, D	8-A
Cntmt. Purge Fan	MF23	
Cntmt. Sample Fan	MF39A & B	
E.S.F.G.D. Air Unit	MF15A & B	23-B
Encl. Bldg. Fan	MF25A & B	
Post Incident Fan	MF18A & B	9-A
Cntmt. Rad. Mon. Valve	HV8121, 8122	
Cntmt. Purge Valve	HV8082	10-A
Purge Fan Iso-Damper	HV5050	
Cntmt. Purge Damper	HV8150, 8151	10-A, 17-A
Encl. Bldg. Damper	HV8079	
Encl. Bldg. Damper	HV8074	
Cntmt. Valve	HV8128	
Encl. Bldg. Damper	HV8153	
E.S.F.G.D. Damper	HV8306	24B
Fuel Handling Damper	HV8062	
E.B. Filt. Damper	HV8254	
E.G. Filt. Htr.	X61A, B	
Cntmt. Rad. Mon. Valve	HV8124	
Cntmt. Purge Valve	HV8125, 8080	10-A
Encl. Bldg. Damper	HV8081	
Cntmt. Purge Damper	HV8126	
Encl. Bldg. Damper	HV8127, 8073, 8070	
Encl. Bldg. Valve	HV8078	
Fuel Handling Damper	HV8143	
Encl. Bldg. Damper	HV8063	
E.S.F.G.D. Damper	HV8312	24B
H ₂ Purge Valve	HV8377, 8378, 8379, 8380	11-A, 21-A
H ₂ Recombiner	H29A & B	7-A
Steam Jet Damper	HV8654, 8695	
Cntmt. Leak Damper	HV8550, 8651	
Cntmt. Rad. Mon. Valve	HV8656	

Aux. HVAC

Cntl. Room Fan	MF21A & B
Cntl. Room Fan	MF31A & B
Cntl. Room Fan	MF32A & B
D.G. Room Fan	MF38A & B
Cntl. Room Damper Cntl.	
Vital Sw. Gr. Rm. Fan	MF51 & 52
Chilled Water Pump	MP122A & B
Chilled Water Pump Valves	HV8846, 8847, 8848, 8850
Chilled Water Pump Valves	HV8853, 8854, 8855, 8856
Cntl. Rm. Htrs.	X60A & B
Cntl. Rm. Compressor	MF22A & B
Cntl. Rm. Condenser	MF36A & B
Cntl. Rm. HVAC Ckts. Misc.	
Chiller	X169A & B
Sw. Gr. Room Valve	PV6925, 6926, 6927
Sw. Gr. Room Fan	MF133 & 134

Clean Liquid Radwaste

Prim. Drain Tank Valve HV9015, 9016, 9230

11-A, 19-A, 100-B, 119-B

Gas & Aerated Liquid Radwaste

Waste Tank Valve HV9125, 9126

: 11-A, 19-A, 68-B, 69-B, 103-B

Sampling System

Valve HV7690

68-Ba, 69-Ba

Encl. & Aux. Bldg. Drains

Cntmt. Sump Valve HV9150, 9151

11-A, 19-A, 110-B

Rx Trip Sw. GearDiesel Generator

D.G. Power & Cntl.
D.G. Unit Cntl.
D.G. Air Compressors

Boric Acid Heat TracingRadiation Monitoring

Hi Range Rad Detector RE8240, 8241
Hi Range Effluent Monitor Rm 8168
Hydrogen Monitor

122-B, 15-C, 37A
See Note 1
22C

Instrumentation

Pz. Pressure & Level	P100 & L110	27-A, 30-A
Pz. Pressure	P102	32-A
Pz. Pressure	P103 & P103-1	2-C, 1-D
Pz. Level	L103	2-D
Pz. Temp.	T101 & T109	3-D
Pz. Relief Valve Monitors	ZS200, 201, 402, 404	17-C, 18-C, 19-C, 20-C
Pz. Relief Valve Temp.	T106, 107, 108	
Quench Tank Pressure	P116	
Quench Tank Temp.	T116	
Quench Tank Level	L116	
RCP Loop Pressure Diff.	P111 & 121	
RCP Loop Temp.	T112 & 122	5-C
RCP Loop Temp.	T111, 115, 121 & 125	4-D, 5-D
RCP Loop Temp.	T103, 104 & 105	
S.G. Pressure	P1013 & 1023	31-A
S.G. Level	L1113 & 1123	29-A, 9-C
S.G. Level	L5271, 5272, 5273, 5274	28-A

Note: See pages 192 & 193 for S.G. Atmosphere Press. P-4223 & 4224.

Aux. Fd. Flow	F5277 & 5278	8-C
Cond. Storage TK Level	L5282	15-D
HPSI Pressure	P301	
LPSI Pressure	P302	9-D
Cntmt. Spray Pressure	P303	
HPSI & LPSI Flow	F311, 312, 321, 322	11-D
HPSI & LPSI Flow	F331, 332, 341, 342	11-D
Cntmt. Spray Flow	F3023 & 3024	
S.I. Tank Pressure	P-311, 321, 331, 341	
S.I. Tank Level	L-311, 321, 331, 341	
S.I. Tank Flow	F305	
Vol. Cntl. Tank Pressure	P225	7-D
Vol. Cntl. Tank (Letdown Temp.)	T224 & 225	
Vol. Cntl. Tank Level	L226	8-D
B.A. Tank Level	L206 & 208	
B.A. Pump Pressure	P206 & 208	
Charging Pressure & Flow	P212 & F212	6-D
Charging Temp.	T229 & 221	
Shutdown Cooling Temp.	T351	12-D
RWST Level	L-3000	
RBCCW Flow	F6034 & 6035	19-D, 20-D
Cntmt. Pressure	P8113, 8114, 8115, 8116	91-B
Cntmt. Pressure	P8117	
Cntmt. Temp.	T8096	
Cntmt. Humidity	H8064	
E.B.F.S. Pressure	P8071 & 8075	
E.B.F.S. Pressure	P8060	
E.B.F.S. Temp.	T8072 & 8076	
Charging Pump Cont.	PS224X, 224Y, 224Z	86-B
Containment Press.	PT8238, 8239	121-B
Cont. Sump Level	LT8242, 8243	16-C
RBCCW Pump Pressure	PS6119A, B, C	67-B

Reactor Protection

Turbine Trip	PS4597A, B, C & D
Nuclear Power	
S. G. Pressure	(see page 444)
Pz Pressure	(see page 420)
Pz Thermal Margin	(see page 436)
R.C. Lo Flow	(see page 433)
S.G. Level	(see page 447)
Ctmt. Pressure	(see page 477)
Mag Jack MG Ld Shed	

Control Elem. Assembly

CEDA Fans MF13A, B, C
 CRD PWR CEA 1 thru 69
 C.R. Reed Switch CEA 1 thru 69

Electrical Penetrations

CONAX	2-A, 36-A
Terminal Blocks	3-A, 1-B

Cable

Low Voltage Power	4-A, 4-B
Control	5-A, 3-B
Instrument (Cerro)	6-A, 5-B
Instrument (Kerite)	6-Aa, 5-Ba
Instrument (Coaxial)	37-A, 122-B
5000 V Power	2-B

Motor Control Centers

MCC B52	30-B
MCC B51, B61	31-B

Misc. Electrical Equipment

Terminal Blocks (Elect. Penetration)	3-A, 1-B
PAM (Weidmuller)	38-A
Electric Conductor Seal Assemblies (CONAX)	12-A
Set Screw Connectors (Ideal)	13-A

Instrumentation (Cold Shutdown Only)

Aux. Fd. PP Speed S4194A	13-D
Aux. Fd. PP Press. P5281, 5284, 5289	14-D, 16-D, 17-D
PMW Flow F210X, Y	
PMW Level L7277	
RBCCW Sd Htx Flow F6042, 6043	21-D, 22-D
RBCCW Sg Tank Level L6001, 6730	18-D, 24-D
RBCCW Hx Temp Ctl, TIC 6306, 7 & 8	23-D

Docket No. 50-336

Northeast Nuclear Energy Company

Millstone Unit No. 2

Attachment 4

Justifications for Continued Operation

and

System Component Evaluation Work Sheets

May 20, 1983

EQUIPMENT DESCRIPTION	ENVIRONMENT			DOCUMENTATION REF*		QUAL. METHOD	OUTSTANDING ITEMS
	Parameter	Spec.	Qual.	Spec.	Qual.		
System: Post Accid. Monit. Plant ID No.: LT-8242, 8243 Component: Level Transmitter Manufacture: GEM Model Number: XM-54852 Function: Containment sump level indication Accuracy: Service: Post accident monitoring Location: CTMT elev. (-)22'6"-(-)15'6" Flood Level Elev. (-)14'4" Above Flood Level: Yes No X	Operating Time	Continuous	Continuous	1	1	Simultaneous Test	
	Temperature (°F)	Profile 18	381°F	D	1	Simultaneous Test	
	Pressure (PSIA)	Profile 19	60 PSIG	D	1	Simultaneous Test	
	Relative Humidity(%)	100%	100%	D	1	Simultaneous Test	
	Chemical Spray	2400 PPM Boron	3000 ppm Boron	F	1	Simultaneous Test	
	Radiation	1.5 x 10 ⁸ R	2.0 x 10 ⁸ R	K	1	Sequential Test	
	Aging	40 Yrs.	40 Yrs.	PDL	1	Sequential Test	
	Submergence	14' 4"	14' 4"	78-771-162-GM		Sequential Test	

*Documentation References:

Notes:

- Wyle Qualification Test Report #45700-2, dated 12/14/82

SCEWS No.

16-C

1983 TER No.

57

Date:

5/20/83

EQUIPMENT ENVIRONMENTAL QUALIFICATION

SER/TER REVIEW

Millstone Unit 2

Docket No. 50-336

I) Summary of new information on SCEW sheet.

Added documentation reference to complete qualification.

II) SER concerns: Equipment in NRC Category I.B

Response:

Same as III

III) TER concerns: Equipment qualification pending modification

Response:

See I above

IV) Proposed corrective action and schedule. N/A

V) Justification for continued operation. N/A

_____ Reaffirmed

_____ Revised

_____ New

SYSTEM COMPONENT EVALUATION WORK SHEET

***Documentation References:**

Notes:

EQUIPMENT ENVIRONMENTAL QUALIFICATION

DISCREPANT EQUIPMENT SUMMARY

MILLSTONE UNIT 2

EQUIPMENT:

Acoustic Monitor; Accelerometer

MANUFACTURER:

Endevco

QUALIFICATION DISCREPANCY:

Equipment qualification not established.

SAFETY FUNCTION AND JUSTIFICATION
FOR CONTINUED OPERATION:

See attached.

**SAFETY FUNCTION AND JUSTIFICATION
FOR CONTINUED OPERATION:**

SUMMARY SHEET NO. 17-C
SCEW SHEET NO. 17-C
Rev.. 3 5/20/83

This equipment has been procured on a risk release basis pending completion of vendor qualification testing. To date Babcock & Wilcox (B&W) has gone through several qualification efforts without success. In light of all the various difficulties the B & W testing have encountered, NNECO has decided to install the Technology for Energy Corporation (TEC) Acoustic Valve-Position Indicator System.

The basic design of the systems are identical except for the Charge Amplifier and associated housing. Therefore, NNECO has a high degree of confidence that the present system would perform its safety related function in an accident scenario. The reason being that the actual test profile is much more severe than the plant's design accident profile. There is significant margin between profiles.

The equipment modification and/or change outs will be performed during the 1984 refueling outage. The qualification documentation references will be identified at that time and submitted to the NRC for review if required.

The qualified life for this equipment will be determined in accordance with IEEE 323-1974 guidelines.

The present equipment was installed as part of the TMI Action Plan under Item 2.1.3a and was required to be operational by 1/1/81.

SCEWS No.

17-C

1983 TER No.

33

Date:

5/20/83

EQUIPMENT ENVIRONMENTAL QUALIFICATION

SER/TER REVIEW

Millstone Unit 2

Docket No. 50-336

I) Summary of new information on SCEW sheet.

None

II) SER concerns: Equipment in NRC Category I.B

Response:

Same as III

III) TER concerns: Equipment qualification pending modification

Response:

Justification for continued operation added.

IV) Proposed corrective action and schedule.

Fully qualified equipment will be installed prior to the end of the 1983 refueling outage.

V) Justification for continued operation.

_____ Reaffirmed

_____ Revised

 X New

EQUIPMENT DESCRIPTION	ENVIRONMENT			DOCUMENTATION REF*		QUAL. METHOD	OUTSTANDING ITEMS
	Parameter	Spec.	Qual.	Spec.	Qual.		
PZR relief valve System: monitors Plant ID No.: ZS-200,201, 402,404 Component: Cable Manufacture: Harline Cable Endevco Model Number: 3075M6 Function: Post accident monitoring Accuracy: Service: Porv discharge line monitoring Location: CTMT C-5 Flood Level Elev:(-)14'4" Above Flood Level: Yes X No	Operating Time	Continuous	Continuous			Simultaneous Test	See Summary Sheet 18-C
	Temperature (°F)	Profile 16,18	Profile 41	D		Simultaneous Test	See Summary Sheet 18-C
	Pressure (PSIA)	Profile 16,19	Profile 42	D		Simultaneous Test	See Summary Sheet 18-C
	Relative Humidity(%)	100%	100%	D		Simultaneous Test	See Summary Sheet 18-C
	Chemical Spray	2400 PPM Boron	3000 PPM Boron	F		Simultaneous Test	See Summary Sheet 18-C
	Radiation	$1.5 \times 10^8 R$	$2 \times 10^8 R$	K		Sequential Test	See Summary Sheet 18-C
	Aging	40 yrs.	To Be Determined	Plant Design Life		Sequential Test	See Summary Sheet 18-C
	Submergence						

*Documentation References:

1. Babcock & Wilcox, valve monitoring system, test program 3-21-80.

Notes:

5/20/83

SUMMARY SHEET NO. 18-C

SCEW SHEET NO. 18-C

EQUIPMENT ENVIRONMENTAL QUALIFICATION

DISCREPANT EQUIPMENT SUMMARY

MILLSTONE UNIT 2

EQUIPMENT:

Acoustic Monitor: Cable

MANUFACTURER:

Endevco

QUALIFICATION DISCREPANCY:

Equipment qualification not established.

SAFETY FUNCTION AND JUSTIFICATION
FOR CONTINUED OPERATION:

See attached.

This equipment has been procured on a risk release basis pending completion of vendor qualification testing. To date Babcock & Wilcox (B&W) has gone through several qualification efforts without success. In light of all the various difficulties the B & W testing have encountered, NNECO has decided to install the Technology for Energy Corporation (TEC) Acoustic Valve-Position Indicator System.

The basic design of the systems are identical except for the Charge Amplifier and associated housing. Therefore, NNECO has a high degree of confidence that the present system would perform its safety related function in an accident scenario. The reason being that the actual test profile is much more severe than the plant's design accident profile. There is significant margin between profiles.

The equipment modification and/or change outs will be performed during the 1984 refueling outage. The qualification documentation references will be identified at that time and submitted to the NRC for review if required.

The qualified life for this equipment will be determined in accordance with IEEE 323-1974 guidelines.

The present equipment was installed as part of the TMI Action Plan under Item 2.1.3a and was required to be operational by 1/1/81.

SCEWS No. 18-C
1983 TER No. 69
Date: 5/20/83

EQUIPMENT ENVIRONMENTAL QUALIFICATION

SER/TER REVIEW

Millstone Unit 2

Docket No. 50-336

I) Summary of new information on SCEW sheet.

None

II) SER concerns: Equipment in NRC Category I.B
Response: Same as III

III) TER concerns: Equipment qualification pending modification.
Response: Justification for continued operation added.

IV) Proposed corrective action and schedule.
Fully qualified equipment will be installed prior to the end of the
1983 refueling outage.

V) Justification for continued operation.

 Reaffirmed

 Revised

 X New

EQUIPMENT DESCRIPTION	ENVIRONMENT			DOCUMENTATION REF*		QUAL. METHOD	OUTSTANDING ITEMS
	Parameter	Spec.	Qual.	Spec.	Qual.		
PZR relief valve System: monitors Plant ID No.: ZS-200,201 402,404 Component: Preamplifier Manufacture: Unholtz- Dickie Model. Number: 22CA-ZTR Function: Post accident monitoring Accuracy: Service: Porv discharge line monitoring Location: CTMT C-5	Operating Time	Continuous	Continuous			Simultaneous Test	See Summary Sheet 19-C
	Temperature (°F)	Profile 16,18	Profile 41	D		Simultaneous Test	See Summary Sheet 19-C
	Pressure (PSIA)	Profile 16,19	Profile 42	D		Simultaneous Test	See Summary Sheet 19-C
	Relative Humidity(%)	100%	100%	D		Simultaneous Test	See Summary Sheet 19-C
	Chemical Spray	2400 PPM Boron	3000 PPM Boron	F		Simultaneous Test	See Summary Sheet 19-C
	Radiation	$1.5 \times 10^8 R$	$2 \times 10^8 R$	K		Sequential Test	See Summary Sheet 19-C
	Aging	40 yrs.	To Be Determined	Plant Design Life		Sequential Test	See Summary Sheet 19-C
Flood Level Elev.(-)14'4" Above Flood Level: Yes X No	Submergence						

*Documentation References:

Notes:

5/20/83

SUMMARY SHEET NO. 19-C

SCEW SHEET NO. 19-C

EQUIPMENT ENVIRONMENTAL QUALIFICATION

DISCREPANT EQUIPMENT SUMMARY

MILLSTONE UNIT 2

EQUIPMENT:

Acoustic Monitors: Preamplifier

MANUFACTURER:

Unholtz-Dickie

QUALIFICATION DISCREPANCY:

Equipment qualification not established.

SAFETY FUNCTION AND JUSTIFICATION
FOR CONTINUED OPERATION:

See attached.

**SAFETY FUNCTION AND JUSTIFICATION
FOR CONTINUED OPERATION:**

SUMMARY SHEET NO. 19-C
SCEW SHEET NO. 19-C
Rev. 3 5/20/83

This equipment has been procured on a risk release basis pending completion of vendor qualification testing. To date Babcock & Wilcox (B&W) has gone through several qualification efforts without success. In light of all the various difficulties the B & W testing have encountered, NNECO has decided to install the Technology for Energy Corporation (TEC) Acoustic Valve-Position Indicator System.

The basic design of the systems are identical except for the Charge Amplifier and associated housing. Therefore, NNECO has a high degree of confidence that the present system would perform its safety related function in an accident scenario. The reason being that the actual test profile is much more severe than the plant's design accident profile. There is significant margin between profiles.

The equipment modification and/or change outs will be performed during the 1984 refueling outage. The qualification documentation references will be identified at that time and submitted to the NRC for review if required.

The qualified life for this equipment will be determined in accordance with IEEE 323-1974 guidelines.

The present equipment was installed as part of the TMI Action Plan under Item 2.1.3a and was required to be operational by 1/1/81.

SCEWS No. 19-C
1983 TER No. 32
Date: 5/20/83

EQUIPMENT ENVIRONMENTAL QUALIFICATION
SER/TER REVIEW

Millstone Unit 2

Docket No. 50-336

I) Summary of new information on SCEW sheet.

None

II) SER concerns: Equipment in NRC Category I.B

Response: Same as III

III) TER concerns: Equipment qualification pending modification.

Response: Justification for continued operation added.

IV) Proposed corrective action and schedule.

Fully qualified equipment will be installed prior to the end of the 1983 refueling outage.

V) Justification for continued operation.

 Reaffirmed

 Revised

 X New

EQUIPMENT DESCRIPTION	ENVIRONMENT			DOCUMENTATION REF*		QUAL. METHOD	OUTSTANDING ITEMS
	Parameter	Spec.	Qual.	Spec.	Qual.		
PZR relief valve System: monitors Plant ID No.: ZS-200,201 402,404 Component: Junction Box Manufacture: Hoffman Model Number: 8064 CHNESS Function: Post accident monitoring Accuracy: Service: Porv discharge line monitoring Location: CTMT C-5	Operating Time	Continuous	Continuous			Simultaneous Test	See Summary Sheet 20-C
	Temperature (°F)	Profile 16,18	Profile 41	D		Simultaneous Test	See Summary Sheet 20-C
	Pressure (PSIA)	Profile 16,19	Profile 42	D		Simultaneous Test	See Summary Sheet 20-C
	Relative Humidity(%)	100%	100%	D		Simultaneous Test	See Summary Sheet 20-C
	Chemical Spray	2400 PPM Boron	3000 PPM Boron	F		Simultaneous Test	See Summary Sheet 20-C
	Radiation	$1.5 \times 10^8 R$	$2 \times 10^8 R$	K		Sequential Test	See Summary Sheet 20-C
	Aging	40 yrs.	To Be Determined	Plant Design Life		Sequential Test	See Summary Sheet 20-C
Flood Level Elev.(-) 14'4" Above Flood Level: Yes X No	Submergence						

*Documentation References:

Notes:

5/20/83

SUMMARY SHEET NO. 20-C

SCEW SHEET NO. 20-C

EQUIPMENT ENVIRONMENTAL QUALIFICATION

DISCREPANT EQUIPMENT SUMMARY

MILLSTONE UNIT 2

EQUIPMENT:

Acoustic Monitors: Termination Box

MANUFACTURER:

Hoffman

QUALIFICATION DISCREPANCY:

Equipment qualification not established.

SAFETY FUNCTION AND JUSTIFICATION
FOR CONTINUED OPERATION:

See attached.

**SAFETY FUNCTION AND JUSTIFICATION
FOR CONTINUED OPERATION:**

SUMMARY SHEET NO.

20-C

SCEM SHEET NO.

20-C

Rev. 3

5/20/83

This equipment has been procured on a risk release basis pending completion of vendor qualification testing. To date Babcock & Wilcox (B&W) has gone through several qualification efforts without success. In light of all the various difficulties the B & W testing have encountered, NNECO has decided to install the Technology for Energy Corporation (TEC) Acoustic Valve-Position Indicator System.

The basic design of the systems are identical except for the Charge Amplifier and associated housing. Therefore, NNECO has a high degree of confidence that the present system would perform its safety related function in an accident scenario. The reason being that the actual test profile is much more severe than the plant's design accident profile. There is significant margin between profiles.

The equipment modification and/or change outs will be performed during the 1984 refueling outage. The qualification documentation references will be identified at that time and submitted to the NRC for review if required.

The qualified life for this equipment will be determined in accordance with IEEE 323-1974 guidelines.

The present equipment was installed as part of the TMI Action Plan under Item 2.1.3a and was required to be operational by 1/1/81.

SCEWS No. 20-C
1983 TER No. -
Date: 5/20/83

EQUIPMENT ENVIRONMENTAL QUALIFICATION
SER/TER REVIEW
Millstone Unit 2
Docket No. 50-336

I) Summary of new information on SCEW sheet.

None

II) SER concerns: None
Response:

III) TER concerns: None
Response:

IV) Proposed corrective action and schedule.

Fully qualified equipment will be installed prior to the end of the 1983 refueling outage.

V) Justification for continued operation.

 Reaffirmed

 Revised

 X New

Docket No. 50-336

Northeast Nuclear Energy Company

Millstone Unit No. 2

Attachment 5

Qualification References

May 20, 1983

Qualification References

Qualification references are indicated in Attachment 4 under the corresponding equipment. The completed set of JCOs and SCEW Sheets, and therefore list of qualification references will be submitted by August 18, 1983.