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 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light Co. 05000251  
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light Co. 05000335  
 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co.  
 AUTH. NAME: UHRIG, R. E. AUTHOR AFFILIATION: Florida Power & Light Co.  
 RECIP. NAME: EISENHUT, D. G. RECIPIENT AFFILIATION: Division of Licensing

SUBJECT: Responds to NRC preliminary evaluation of response to IEI Bulletin 79-10B, "Environ. Qualification of Class IE Equipment." Systematic rejection of work on IEI Bulletins 79-01, 79-01B & suppls found disturbing.

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 TITLE: Equipment Qualification (OR & PRE-OL)

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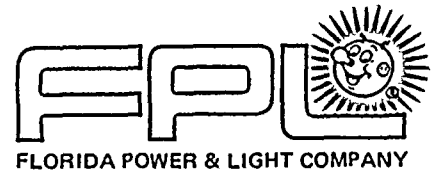
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1. The first part of the report deals with the general situation in the country. It is noted that the economy is in a state of depression and that the government is facing a serious financial crisis. The report also mentions that the population is suffering from widespread poverty and unemployment.

2. The second part of the report discusses the political situation. It is noted that the government is weak and that there is a lack of unity among the political parties. The report also mentions that the military is in a state of disarray and that there is a risk of a coup d'état.

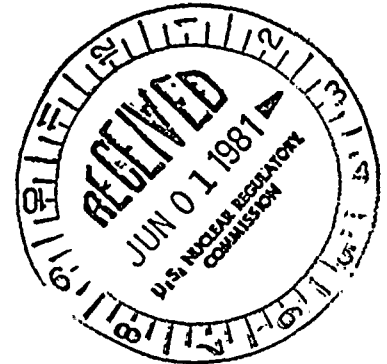
3. The third part of the report deals with the social situation. It is noted that the population is suffering from widespread poverty and unemployment. The report also mentions that there is a high level of illiteracy and that the health care system is in a state of collapse.

4. The fourth part of the report discusses the international situation. It is noted that the country is in a state of isolation and that there is a lack of support from the major powers. The report also mentions that the country is facing a serious threat from the Axis powers.



May 28, 1981  
L-81-230

Office of Nuclear Reactor Regulation  
Attention: Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555



Dear Mr. Eisenhut:

Re: Turkey Point Units 3 & 4 and St. Lucie Unit 1  
Docket No. 50-250, 50-251, and 50-335  
Environmental Qualification of Electrical Equipment

We have received the preliminary evaluation of our response to I&E Bulletin 79-01B for Turkey Point Units 3 & 4 and St. Lucie Unit 1. Florida Power & Light Company, together with our architect engineers, have spent considerable time, effort, and money researching and evaluating the environmental qualification information requested by I&E Bulletin 79-01, 79-01B and the supplements to 79-01B. We find the systematic rejection of that work for non-technical reasons disturbing.

We found the majority of the equipment evaluated against the D.O.R. guidelines to be acceptable by test, analysis or a combination of both. We committed to replace or upgrade the installation of the equipment that could not be demonstrated to fully meet the guidelines. These actions are scheduled to be completed by the Commission's Memorandum Order date of June 1982, unless qualified equipment for these applications are not available.

Despite our efforts, the preliminary evaluation by the NRC has noted many deficiencies or unanswered questions. It is obvious that considerable effort is still required by both our staffs to complete the NRC review of our response, and the review of backup documentation in our files. If after reviewing our supporting documentation and analysis additional equipment is identified as having to be replaced or further tested, this delay will most likely cause us to be unable to meet the June of 1982 deadline.

Many of the current manufacturers of safety related equipment are quoting delivery dates that already go beyond June of 1982. Recently, at a meeting with members of the NRC's I&E and the NRR's Equipment Qualification Branch, a representative of a major instrumentation supplier stated that their quoted delivery dates were a minimum of 14 months. At this time, and based upon an analysis of the industry's needs, he and his competitors would need three to four years to deliver the required instruments to the industry.

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The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that every entry should be supported by a valid receipt or invoice. This ensures transparency and allows for easy verification of the data.

In the second section, the author outlines the various methods used to collect and analyze the data. This includes both manual and automated techniques. The goal is to ensure that the information gathered is both reliable and comprehensive.

The third section provides a detailed breakdown of the results. It shows that there has been a significant increase in the number of transactions over the period studied. This growth is attributed to several factors, including improved marketing strategies and a more efficient distribution network.

Finally, the document concludes with a series of recommendations for future actions. It suggests that continued investment in technology and staff training will be essential for maintaining the current level of performance and achieving further growth.

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In an effort to overcome this problem Florida Power & Light Company, together with many other utilities, are involved in programs to qualify electrical and electronic equipment, but these programs take considerable time. Testing facilities are backlogged and qualification programs are very complex. The excessive conservatism of the test requirements test equipment to the edge of available technology. Issues such as artificial aging are complex and time consuming. A qualification program can take a year or more, just to demonstrate five to ten years of qualified life. These rigorous, time consuming, expensive programs are not necessarily resulting in a safer plant. Equipment ends up being designed around the test conditions instead of service conditions. Sacrifices in accuracy, servicability and availability are made so that the equipment can pass a full test plan. This considerable effort is being undertaken despite our findings that the plant is safe to operate and the issue is one of backfitting new criteria.

We are also finding that manufacturers are having to be coaxed and cajoled to participate in these qualification programs. Many of the suppliers of quality equipment are leaving the nuclear business since it represents a small fraction of their business and the regulatory requirements make it unattractive to continue to deal in nuclear applications.

It is our position that more realistic guidelines need to be developed, and that the industry should be given sufficient time to meet the requirements.

In addition, the NRC position (Technical Specification 6.1.3.1) of all safety-related electrical equipment required by June 30, 1982 is unclear. We plan on implementing these requirements in the following manner:

- (a) For new equipment subject to I&E Bulletin 79-01B, whether for replacement of existing equipment or new application, we will apply the guidelines of NUREG 0588 category I, unless there are sound reasons to the contrary. These reasons could be incompatibility or unavailability of equipment.
- (b) Installed equipment we have evaluated against the "DOR Guidelines for Operating Plants" and found to be acceptable, will be maintained, including replacing parts as required, in accordance with the manufacturers instructions to maintain the qualification of this equipment.
- (c) For safety related equipment, not subject to a harsh environment, we are requiring testing and certification to our seismic requirements and are awaiting further industry guidance with respect to environmental qualification.

1. The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that proper record-keeping is essential for the integrity of the financial system and for the ability to detect and prevent fraud. The text notes that without reliable records, it would be difficult to track the flow of funds and identify any irregularities.

2. The second part of the document outlines the specific procedures for recording transactions. It details the steps involved in entering data into the system, including the use of standardized codes and the requirement for double-checking entries. The document also mentions the importance of regular audits to ensure that the records are up-to-date and accurate.

3. The third part of the document discusses the role of the accounting department in maintaining these records. It highlights the need for clear communication and collaboration between different departments to ensure that all transactions are properly recorded and reported. The text also mentions the importance of training staff to ensure they are familiar with the procedures and can identify any potential issues.

4. The fourth part of the document discusses the importance of data security and confidentiality. It notes that financial records contain sensitive information and must be protected from unauthorized access. The document outlines the measures in place to ensure data security, including the use of secure systems and the implementation of strict access controls. It also mentions the importance of regular backups and disaster recovery plans.

5. The fifth part of the document discusses the importance of transparency and accountability. It notes that accurate records are essential for providing a clear and concise picture of the organization's financial performance. The document also mentions the importance of regular reporting and the ability to provide detailed explanations for any discrepancies or irregularities.

6. The sixth part of the document discusses the importance of continuous improvement. It notes that the financial system is constantly evolving and that it is essential to stay up-to-date with the latest technologies and best practices. The document mentions the importance of regular reviews and the implementation of changes to improve efficiency and accuracy. It also notes the importance of staying informed about industry trends and regulations.

7. The seventh part of the document discusses the importance of collaboration and teamwork. It notes that maintaining accurate records is a complex task that requires the input and expertise of many different people. The document emphasizes the need for clear communication and the ability to work together to solve problems and improve the system. It also mentions the importance of providing support and training to staff.

8. The eighth part of the document discusses the importance of documentation. It notes that all procedures and policies must be clearly documented and easily accessible to all staff. The document mentions the importance of regular updates to the documentation to reflect any changes in the system. It also notes the importance of keeping a record of all changes and the reasons for them.

9. The ninth part of the document discusses the importance of training and development. It notes that staff must be properly trained to use the financial system and to identify any potential issues. The document mentions the importance of providing ongoing training and development opportunities to ensure staff are up-to-date with the latest skills and knowledge. It also notes the importance of encouraging staff to take ownership of their work and to continuously improve their performance.

10. The tenth part of the document discusses the importance of compliance. It notes that the financial system must comply with all applicable laws and regulations. The document mentions the importance of regular audits and the implementation of controls to ensure compliance. It also notes the importance of staying informed about changes in regulations and the ability to adapt the system accordingly.

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It is our opinion that these guidelines, along with our procedures for controlling design and maintenance, provide a high level of confidence that the electrical equipment utilized in the plant meet the required environmental qualifications.

Yours very truly,



Robert E. Uhrig  
Vice President  
Advanced Systems and Technology

REU/JEM/ras

cc: Mr. James P. O'Reilly, Region II  
Harold F. Reis, Esquire

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