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 YOUNGBLOOD, B.J. Licensing Branch 1

SUBJECT: Provides revision to rept re environ qualification of Class IE equipment, Section 2E re procurement of spare parts to be discussed at NRC 810224 meeting. Lists steps to be taken for procurement of spare or replacement parts.

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NORMAN W. CURTIS
Vice President-Engineering & Construction-Nuclear
770-5381

February 11, 1981

Mr. B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docket Nos. 50-387
50-388

SUSQUEHANNA STEAM ELECTRIC STATION
CLASS IE SPARE PARTS QUALIFICATION
ER 100450 FILE 843
PLA-636

Dear Mr. Youngblood:

The following is a revision to Section 2E of Pennsylvania Power and Light Co.'s Environmental Qualification of Class IE Equipment Report. This revision is our position on procurement of spare parts which we will discuss with you at the February 24, 1981 meeting.

PP&L intends to comply with the provisions of the May 23, 1980 Memorandum and Order CLI-80-21, including the section that covers spare and replacement parts and states "unless there are sound reasons to the contrary, the 1974 standard in NUREG-0588 will apply".

Following consideration of this provision we have concluded that the protection of the health and safety of the public and PP&L employees will be maximized by use of an identical replacement or spare part where ever possible. Use of non-identical spare or replacement parts, whether or not they are qualified to NUREG-0588 Category I, raises serious questions concerning the compatability of the items used, and may result in added confusion and decreased human factors effectiveness due to non-standardization of equipment. In addition the use of identical spare and replacement parts will insure qualification of all identical parts to at least NUREG-0588 Category II, by June 30, 1982, through the qualification of all Class IE equipment, as required, by the May 23, 1980 Memorandum and Order and the IE Bulletin 79-01B Supplement 2 by our ongoing qualification program.

Boo/s
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Therefore, a reasonable effort will be made to procure identical replacement or spare parts qualified to the 1974 standard in NUREG-0588, or to some lesser degree where a part qualified to NUREG-0588 Category I, cannot be readily obtained.

If an identical part cannot be obtained, we will procure a non-identical functionally and physically equivalent part. This non-identical part shall be obtained qualified to NUREG-0588 Category I, where possible, or to some lesser standard, where an item qualified to NUREG-0588 Category I cannot be obtained. If a non-identical part is procured, it shall require an engineering justification and shall be traced through warehousing and installation, until questions concerning the qualification and compatibility have been resolved and documented."

In accordance with this philosophy, the following steps are being taken when purchasing Class IE spare or replacement parts. These steps constitute our present perception of a reasonable effort.

- 1) Ask the supplier or suppliers (if this is the normal procedure in a given case) to supply an identical item that is qualified to NUREG 0588 Category I.
- 2) If the supplier in step 1 is not the original manufacturer or supplier under the original Bechtel Purchase Order, and he cannot supply an identical part qualified to NUREG-0588 Category I, a parallel effort shall be made to obtain an identical part qualified to NUREG-0588 Category I, from the original manufacturer or supplier. This effort shall be documented and may take the form of a telephone conversation, letter, meeting minutes, etc., at the option of the purchasing organization.

Note: If a qualified item cannot be obtained through step 1, then step 2 must be undertaken only if it has not been accomplished for the specific item in question for a period of 1 year prior to the date of the request for quotation or the date of the purchase order (whichever occurs first).

- 3) If an identical part qualified to NUREG-0588 Category I cannot be obtained, an attempt will be made to buy the identical part with the best qualification the supplier or suppliers may have. Two things should be noted: a) it is permissible for the purchasing organization to request, as part of step 1, that a supplier or suppliers provide (or quote) an identical part with Category I qualification or whatever qualification is the best the supplier(s) has, provided that step 2 is undertaken upon notification that a Category I part is not being supplied (or quoted) and (b) the purchasing organization may, at its option, extend this step to suppliers not included in steps 1 and 2.



11

Mr. B. J. Youngblood

Page 3

February 11, 1981

- 4) If an identical part cannot be obtained using steps 1, 2 and 3, then the supplier(s) shall be requested to provide a non-identical functionally and physically equivalent part qualified to NUREG-0588 Category I, or to the highest standard the supplier has available. Any parts obtained using this step (i.e. any non-identical parts) require engineering justification and shall be tracked through warehousing and installation until questions concerning qualification and compatibility are resolved and documented, or the item is replaced by a part identical to that originally used.

Very truly yours,



N. W. Curtis

Vice President-Engineering and Construction-Nuclear

CTC/mks

cc: R. M. Stark - NRC

