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Proposed Revisions to Environmental Qualification of Mechanical and Electrical Equipment

Comment On: NRC-2017-0229-0001

Proposed Revisions to Environmental Qualification of Mechanical and Electrical Equipment; Request for Comment on Standard Review Plan-Draft Section Revision

Document: NRC-2017-0229-DRAFT-0003

Comment on FR Doc # 2017-26256

Submitter Information

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General Comment

See attached file.

Attachments

LTR-NRC-18-8

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LTR-NRC-18-8

February 2, 2018

Subject: Transmittal of Comments on SRP Section 3.11 [Docket ID NRC-2017-0229]

Westinghouse Electric Company LLC (Westinghouse) appreciates the opportunity to provide comments to the NRC on draft Standard Review Plan (SRP) Section 3.11, Revision 4, "Environmental Qualification of Mechanical and Electrical Equipment." Westinghouse appreciates the NRC staff's consideration of the following comments.

1. Clarification on the definition of "anticipated operational occurrences."

Section I, "Areas of Review," pages 3.11-2 and 3.11-3 states the following:

The regulation defined a "mild" environment as an environment that would at no time be significantly more severe than the environment that would occur during normal plant operation, including anticipated operational occurrence. The NRC stated in 10 CFR 50.49 that environmental qualification of electric equipment located in a "mild" environment was not included within the scope of 10 CFR 50.49. For the purposes of this SRP section, an environment that exceeds NRC's definition of "mild" will be termed "harsh."

Based on this text, Westinghouse is seeking clarification on/expansion of the definition of "anticipated operational occurrence." For example, are changes in temperature and humidity due to loss of HVAC considered "harsh" under the NRC definition, or are these abnormal conditions considered as operational transients, which would be considered part of the "mild" environment definition?

2. Clarification of Section I, Review Interfaces Item 11.

Section I, "Areas of Review," page 3.11-9, Item 11 states:

Review of the chemical environment for equipment required to be qualified is performed by the organization responsible for the review of chemistry to determine .

This statement appears to be incomplete. Westinghouse suggests NRC revises this sentence to clarify what is to be determined by review of the chemical environment.

3. Clarification of reference to Regulatory Guide (RG) 1.97.

Section III, "Review Procedures," page 3.11-23, Item 4 discusses qualification of post-accident monitoring (PAM) equipment based on Revision 4 of RG 1.97:

The regulatory requirements in 10 CFR 50.49(b)(3) reference the guidance in Revision 4 to RG 1.97.

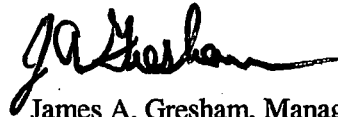
RG 1.97 identifies different "categories" and "types" of PAM equipment, and these differences may have different qualification needs. Because of this, Westinghouse suggests that the statement in Item 4 cited above be expanded to clarify that RG 1.97 provides qualification for the different categories and types of PAMS equipment. Westinghouse suggests the following wording:

The regulatory requirements in 10 CFR 50.49(b)(3) reference the guidance for the qualification of the different categories and types of PAM equipment in Revision 4 to RG 1.97.

4. Only one version of Institute of Electrical and Electronics Engineers (IEEE) Standard (Std.) 323 should be referenced.

See Section VI, "References." By referencing the current versions of RG 1.209 and RG 1.89 in the same SRP section, both IEEE Std. 323-1974 and 323-2003 become referenced. The environmental qualification requirements for Digital Instrumentation and Control (I&C) and other equipment should not be split between two years of the same standard. The environmental qualification program should be based on a single version of IEEE Std. 323 or International Electrotechnical Commission (IEC)/IEEE Std. 60780-323-2016 to standardize the requirements across the program.

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