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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

JUL 28 1980

Docket No. 50-155

Mr. David P. Hoffman  
Nuclear Licensing Administrator  
Consumers Power Company  
212 West Michigan Avenue  
Jackson, Michigan 49201

Dear Mr. Hoffman:

SUBJECT: ANCHORAGE AND SUPPORT OF SAFETY RELATED ELECTRICAL EQUIPMENT

- References:
1. Letter from D. Eisenhut to SEP Licensees, dated January 1, 1980
  2. Letter from R. Schaffstall to D. Crutchfield, dated July 3, 1980

Reference 1 identified a potential safety concern relative to the anchorage and support of safety related electrical equipment and requested that you initiate a program to resolve this issue including the installation of any required modifications by September 1, 1980. Reference 2 describes a program which was developed by the Systematic Evaluation Program Owners Group in response to comments made by members of the NRC staff at a May 14, 1980 meeting in Bethesda. As a result of your comments and our review of Reference 2, we are providing additional guidance to you as indicated in the Attachments.

Attachment 1 provides guidance as to the expected scope of your investigations and information which should be documented for our review. A suggested format for this documentation is provided in Attachment 2. Due to the lack of clarification relative to certain requirements of Reference 1 and in particular the issue of support of internally attached electrical components, we will permit an extension until December 31, 1980 for completion of this program. This shall include the installation of any modifications which may be required as a result of your investigations. Any modifications shall be made in accordance with 10 CFR 50.59 of the Commission Regulations. We request that formal documentation summarizing your program be submitted to this office by December 31, 1980.

Existing plant floor response spectra or floor response spectra computed or estimated from the NRC Site Specific Spectra Program are acceptable

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for use in your evaluation. The conservatism of these loadings shall be verified when the final floor response spectra are available.

Sincerely,

*Thomas V. Wambach*  
for Dennis M. Crutchfield, Chief  
Operating Reactors Branch #5  
Division of Licensing

Attachments:  
As stated

cc w/attachments:  
See next page

Mr. David P. Hoffman

cc

M. I. Miller, Esquire  
Isham, Lincoln & Beale  
Suite 4200  
One First National Plaza  
Chicago, Illinois 60670

Mr. Paul A. Perry, Secretary  
Consumers Power Company  
212 West Michigan Avenue  
Jackson, Michigan 49201

Judd L. Bacon, Esquire  
Consumers Power Company  
212 West Michigan Avenue  
Jackson, Michigan 49201

Myron M. Cherry, Esquire  
Suite 4501  
One IBM Plaza  
Chicago, Illinois 60611

Ms. Mary P. Sinclair  
Great Lakes Energy Alliance  
5711 Summerset Drive  
Midland, Michigan 48640

Kalamazoo Public Library  
315 South Rose Street  
Kalamazoo, Michigan 49006

Township Supervisor  
Covert Township  
Route 1, Box 10  
Van Buren County, Michigan 49043

Office of the Governor (2)  
Room 1 - Capitol Building  
Lansing, Michigan 48913

Director, Technical Assessment  
Division  
Office of Radiation Programs  
(AW-459)  
U. S. Environmental Protection  
Agency  
Crystal Mall #2  
Arlington, Virginia 20460

U. S. Environmental Protection  
Agency  
Federal Activities Branch  
Region V Office  
ATTN: EIS COORDINATOR  
230 South Dearborn Street  
Chicago, Illinois 60604

Charles Bechhoefer, Esq., Chairman  
Atomic Safety and Licensing Board  
Panel  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dr. George C. Anderson  
Department of Oceanography  
University of Washington  
Seattle, Washington 98195

Dr. M. Stanley Livingston  
1005 Calle Largo  
Santa Fe, New Mexico 87501

Resident Inspector  
c/o U. S. NRC  
P. O. Box 87  
South Haven, Michigan 49090

Palisades Plant  
ATTN: Mr. J. G. Lewis  
Plant Manager  
Covert, Michigan 49043

William J. Scanlon, Esquire  
2034 Pauline Boulevard  
Ann Arbor, Michigan 48103

ATTACHMENT 1  
ANCHORAGE AND SUPPORT OF SAFETY  
RELATED ELECTRICAL EQUIPMENT  
POINTS TO BE ADDRESSED BY SEP  
LICENSEES IN DECEMBER 31, 1980  
SUBMITTAL

1. Information should be provided not only for the anchorage of electrical equipment but also the entire support that provides a load path (such as bracing and frames), as well as support for internally attached components. The latter is especially important for cabinet or panel type electrical equipment (such as control panels, instrument panels, etc.) which has internally supported components. An example of a potential improperly supported internal component would be a heavy component cantilevered off a front sheet metal panel without additional support to a stronger and stiffer location. These inadequate supports for internal components also should be identified and corrected before December 31, 1980.
2. In order to verify that an anchorage or a support of safety related electrical equipment has adequate capacity, provide justification by test, or analytical means. If expansion anchor bolts exist, justification provided previously for IE Bulletin 79-02 can be utilized if applicable. The acceptance criteria for substantiating these judgements should be provided, this may involve specifying the factor of safety and allowable stress limits used for design and justifying the overturning moment and shear force used.
3. Provide a table listing all (to include both floor and wall mounted) safety related electrical equipment in the plant. For each piece of equipment provide the information described in the attached table (attachment 2).  
  
These investigations of each piece of equipment should determine:
  - a. Whether positive anchorage or support exists
  - b. The type of anchorage
  - c. Whether internally attached components are properly supported
  - d. Identify non-seismic Category I equipment, the dislodgement of which during an earthquake may be detrimental to safety related equipment and render them inoperable. Inspection of the anchorages of such non-seismic Category I equipment should be conducted. If positive anchorages do not exist, they should be identified and modified before December 31, 1980.
4. Wherever modifications of anchorages or supports are required, these modifications should be implemented and thoroughly documented.
5. The seismic design of cable trays may be treated as a separate problem, because of its complexity. Each licensee or the SEP Owner's Group should provide a separate action plan for the resolution of this issue within 30 days of receipt of this letter.

ATTACHMENT 2  
 SUMMARY OF INVESTIGATION OF ANCHORAGE AND SUPPORT OF  
 SAFETY RELATED ELECTRICAL EQUIPMENT AND NON-SEISMIC CATEGORY I  
 ITEMS THAT MAY DAMAGE THIS EQUIPMENT

Equip. Name	Equip. ID	System In Which Installed	Location Bldg. & Elev.	Type of Anchorage*	Was Anchorage Modified Since Jan. 1, 1960	Internally Attached Components			Non-Seismic Cat I Items that could potentially interact with this equip.			I.D. of Document Supporting Conclusion
						Equip. Name & ID	Type of Support	Was Support Evaluated	Name & ID	Type of Support	Was Support Evaluated	

\*Examples of Type of Anchorage:

1. Bolted to Equipment
2. Bolted to Concrete Wall
3. Bolted to Concrete Slab
4. Bolted to Block Wall
5. Welded to Embedded Channel