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August 28, 1980

RICHARD E. SCHAFFSTALL  
Associate

Mr. Dennis M. Crutchfield, Chief  
Systematic Evaluation Program Branch  
Division of Operating Reactors  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: Anchorage and Support of Class 1E Equipment

- References:
1. Letter from D. Eisenhut to SEP licensees dated January 1, 1980
  2. Letter from R.E. Schaffstall to D. Crutchfield dated July 3, 1980
  3. Letter from D. Crutchfield to the SEP licensees dated July 28, 1980

Dear Mr. Crutchfield:

Reference 1 identified a potential safety concern relative to the anchorage and support of safety related electrical equipment. Reference 2 provided clarification of the SEP Owners' programs in response to staff comments at a meeting on May 14, 1980. Reference 3 provided further staff guidance on the staff requirements. This letter provides information requested in Reference 3 and discusses several of the new requirements presented in Reference 3.

The staff requested that a program addressing seismic design of cable trays be proposed instead of treating anchorage at this time. The SEP Owners Group has contracted with URS/Blume to develop and implement a program to seismically qualify cable trays at SEP plants. Enclosure 1 is a brief description of the initial phase of the program. Depending on specific plant configurations, full scale testing may be required for some plants while other plants may be able to rely on previous tests or analysis. It is expected that the entire program, including testing, will require approximately 18 months. Anchorage will be addressed as part of the program.

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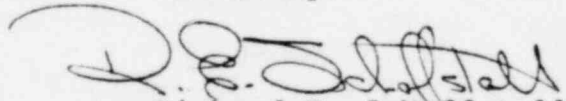
Reference 3 suggests a format for documentation. The format requires substantially more information than would seem necessary. Further, it will require a complete reformatting of information which some owners have already compiled.

The addressing of non-seismic ancillary equipment has been expanded to address all non-seismic equipment. Such an expansion may entail a major effort and may not practically be completed by December 31, 1980.

The assessment of internally supported equipment should not be considered separately from equipment operability qualification.

Rather than resolve the seismic qualification program on a piece-meal basis which appears to be the approach suggested by References 1 and 3, the SEP Owners Group is working on a program which is focused toward assuring the functionality of Class 1E electrical equipment in the event of an SSE. Assuring a load path and internals support is a part of this program. The SEP Owners Group cannot be prepared to discuss the program in detail until late October or November since we will not have contracted with a consultant until that time. We will, however, discuss our preliminary thinking and planning with the staff in mid-September to assure that our approach is reasonable.

Sincerely,

  
Richard E. Schaffstall  
Executive Director  
SEP Owners Group