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DOCKET NUMBER
PROPOSED RULE

PR-50 (53)
(45 FR 36082)

August 5, 1980



Mr. John F. Ahearne, Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Ahearne:

Rochester Gas and Electric Corporation feels obligated to provide comments regarding the May 23, 1980 Commission Memorandum and Order regarding Environmental Qualification (and Fire Protection). In that Memorandum and Order, the Commission stated that, for Operating Reactors, the "DOR Guidelines" be adopted as the means for complying with GDC 4 of 10CFR50, Appendix A. We find that identifying this singular approach to meeting a general safety function is highly undesirable.

We do not question the fact that additional guidance for environmental qualification of electrical equipment is necessary. And as such guidance, we find the "DOR Guidelines" to be reasonable. Our concern lies with the sentence on page 6 in the Memorandum and Order stating that "the Commission is ordering today that these two documents [DOR Guidelines and NUREG-0588] form the requirements which licensees and applicants must meet in order to satisfy those aspects of 10CFR50... GDC-4 which relate to environmental qualifications of safety-related electrical equipment". This appears to give the "DOR Guidelines" the force of law. We find this premature, since the "DOR Guidelines" have never been subject to public review and comment, and have never been endorsed by established review bodies such as RRRC or ACRS. We believe that such a thorough review would result in a number of substantive changes. We base this belief on the history of similarly focused regulatory documents such as Regulatory Guides 1.89 and 1.97.

Because of this lack of review, and because we feel that there are valid technical concerns with the guidelines, it is our opinion that these "DOR Guidelines" should be viewed as preliminary and, as such, be used by the NRC staff as guidelines, not as a rule, in evaluating equipment qualification. Thus, the DOR Guidelines would specify an acceptable method of complying with GDC 4, rather than the only method.

We note that, on page 10 of the Memorandum and Order, the Commission does appear to provide some room for the NRC staff to make judgments regarding the acceptability of equipment which does not comply with every aspect of the DOR Guidelines ("These

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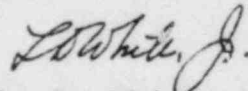
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deficiencies do not necessarily mean that the equipment is unqualified. However, they are cause for concern and require further case-by-case evaluations since the deviations involve areas which any environmental judgment must address"). Although we presume that these two sentences do provide allowance for judgment in making adequate environmental qualification assessments, we find them difficult to reconcile with the previously quoted sentence from page 6.

We feel it would be of great benefit for the Commission to provide a clarification to the NRC staff stating that if, following staff review of the available qualification documentation, there is reasonable assurance that the equipment is qualified to perform its required safety function, even though not every aspect of the "DOR Guidelines" is met, the need for corrective action should be evaluated.

We sincerely hope you will give due consideration to our concerns.

Very truly yours,



L. D. White, Jr.

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