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

May 19, 1981

Nicholas S. Reynolds, Esquire
Debevoise and Liberman
1200 Seventeenth Street, N. W.
Washington, DC 20036

IN RESPONSE REFER
TO FOIA 81-97

Dear Mr. Reynolds:

This is in partial response to your letter dated March 10, 1981 in which you requested, pursuant to the Freedom of Information Act, copies of documents relating to 18 categories on CLI-80-21 regarding environmental qualifications of safety-related electrical equipment.

The documents listed on the appendix are enclosed.

The NRC has not completed its review of the remaining documents subject to your request. We will respond as soon as the review is completed.

Sincerely,

for Frank W. Karas
J. M. Felton, Director
Division of Rules and Records
Office of Administration

Enclosures: As stated

U.S. NRC
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1. July 21, 1971 Ltr to J.-Foster, GE, from Stephen Hanauer
2. Undated Questions and Answers re environmental qualification
(This document is a part of the staff responses to
Commission questions on June 21, 1978 and also an
attachment to the 6/6/79 memo to Commissioner Bradford
from Tom Gibbon)

LAW OFFICES OF
DEBEVOISE & LIBERMAN

1200 SEVENTEENTH STREET, N.W.
WASHINGTON, D.C. 20036
TELEPHONE (202) 857-9800

March 10, 1981

J. M. Felton
Director
Division of Rules and Records
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

FREEDOM OF INFORMATION
ACT REQUEST

FOIA-81-97
Rec'd 3-13-81

Re: Freedom of Information Act Request

Dear Mr. Felton:

Pursuant to the Freedom of Information Act (5 U.S.C. §552) and NRC Regulations (10 C.F.R. Part 9), Debevoise & Liberman requests copies of all documents prepared by the NRC, its Staff and consultants relative to the following:

1. Any assessment (including, but not limited to, those generated by OELD and/or OGC) regarding the decision not to issue the draft "Final Rule," transmitted to Thomas R. Gibbon, Jr., by Howard Shapar on August 29, 1980, to codify requirements related to environmental qualifications of safety-related electrical equipment, announced by the Commission in CLI-80-21 (May 30, 1980, 11 NRC 707, "CLI-80-21").
2. The September 2, 1980 letter from H. R. Denton to R. B. Minogue concerning "the advisability of developing in a broad single rulemaking action an amendment to 10 C.F.R. 50 which would include (1) the rulemaking directed by the Commission, on environmental qualification of electrical equipment (CLI-80-21), (2) the rulemaking proposed in the Commission paper from I&E (Secy-80-139), on independent verification and testing and inspection of equipment's environmental qualification, and (3) broadly assess the qualification of both electrical

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- and mechanical equipment... for seismic and dynamic loading conditions...", all responses thereto, any assessments thereof, and a list of persons to whom copies of the letter were sent.
3. The July 11, 1979 Commission briefing by the Staff concerning licensing responses to I&E Bulletin 79-01 and any resulting documents.
 4. The schedule for revising NUREG-0588 in response to any previously received public comments and any status reports concerning achievement of such schedule.
 5. The basis for the assertion in H. R. Denton's August 24, 1979 memorandum to Commissioner Kennedy entitled "UCS Petition for Rulemaking" at p. II.3 that compliance with IEE STD 323-1974 could be demonstrated in three to four years.
 6. The basis for the assertion in H.R. Denton's August 24, 1979 memorandum to Commissioner Kennedy entitled "UCS Petition for Reconsideration" at p. II.3 that there are adequate test facilities to enable affected NRC licensees to demonstrate compliance with IEE STD 323-1974.
 7. All bi-monthly progress reports advising the Commission and public of the status of incomplete environmental qualification of safety-related electrical equipment, along with corrective actions taken or planned, prepared pursuant to CLI-80-21 and/or all statements concerning the status of such progress reports if they were not prepared.
 8. The basis for the statement on page 9 of CLI-80-21 that "some licensees did not meet the time deadlines imposed and did not provide the information required by Bulletin 79-01, that others had unqualified equipment in their plants, that others did not have the documentation required to show qualification and that still others did not include such documentation".
 9. The basis for the statement in CLI-80-21 at page 12 that "by no later than June 30, 1982, all

safety-related electrical equipment in all operating plants shall be qualified to DOR Guidelines or NUREG-0588."

10. All Commission questions directed to the Staff including but not limited to those of October 6, December 6, and December 12, 1978 concerning issues raised by the UCS May 2, 1978 Petition for Reconsideration.
11. The July 6, 1978 Staff responses to the June 27, 1978 Commission Order that the Staff provided views on all issues raised by the UCS Petition for Reconsideration submitted on May 2, 1978.
12. The October 26, 1978 Staff response to questions directed to it by the Commission in response to issues raised in the May 2, 1978 UCS Petition for reconsideration.
13. The August 4, 1978 memorandum from Commissioner Bradford to the Staff requesting it to provide generic Staff responses to industry questions on the DOR Guidelines and NUREG-0588.
14. The August 24, 1979 Staff response to Commission questions raised by the May 2, 1978 UCS Petition for Reconsideration and the March 7, 1979 UCS Motion for Expedited Decision Making.
15. The August 31, 1978 Staff response to the June 27, 1978 Commission request that the Staff provide its views on all issues raised by the UCS Petition for Reconsideration submitted on May 2, 1978.
16. The September 19, 1978 Staff clarification of its response to the June 27, 1978 Commission request that the Staff provide its views on all issues raised by the May 2, 1978 UCS Petition for Reconsideration.
17. Any assessments, evaluations, or surveys regarding the ability of operating plant licensees to comply with the requirements for environmental qualification of safety-related electrical equipment by June 30, 1982 as required in the CLI-80-21.

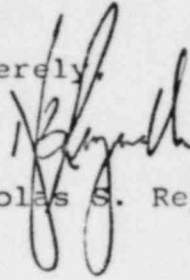
J. M. Felton
March 10, 1981
Page four

18. Secy-80-370.

Such documents should include any drafts, supporting materials, studies, or other such reports, correspondence, or testimony, regarding the aforementioned areas of interest.

We would appreciate your prompt response to this request within the ten working day period afforded by 10 C.F.R. Part 9.

Sincerely,

A handwritten signature in cursive script, appearing to read "N. Reynolds", written in dark ink.

Nicholas S. Reynolds

UNITED STATES
 ATOMIC ENERGY COMMISSION
 WASHINGTON, D.C. 20545

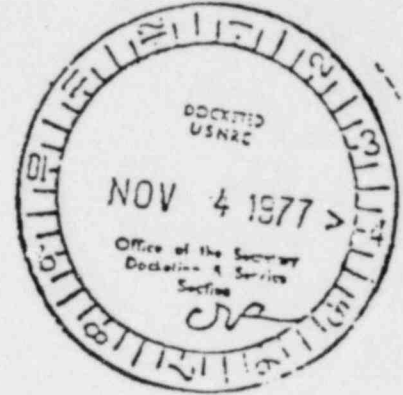
POOR ORIGINAL

July 21, 1971

Mr. J. Forster
 Atomic Power Equipment Department
 General Electric Company - M/COB7
 175 Curtner Avenue
 San Jose, California 95125

Subject: IEEE-323

Dear Jay:



My comments on this document were solicited by Mr. Sherr in his letter of June 24, 1971. He should not have done it.

I cannot find a single redeeming feature in this worthless document. Far from being what its title suggests, it contains only the most general kind of stuff on how to qualify something - anything. The body of the document is not even specific enough to be related to electrical equipment. Furthermore, the various clauses are so general that it's essentially impossible to determine compliance. For these reasons the referenced document in its present form is, as I said above, without value.

Sincerely yours,

Stephen H. Hanauer

cc: Louis Costrell
 Sava I. Sherr

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

APR 6 1979

POOR ORIGINAL

NOTE TO: Attached List

FROM: S. H. Hanauer, Assistant Director for Plant Systems, DSS

SUBJECT: 1. ENVIRONMENTAL QUALIFICATION
2. INSTRUMENTATION TO FOLLOW THE COURSE OF AN ACCIDENT

I believe that as a result of the TMI accident, we have to rethink:

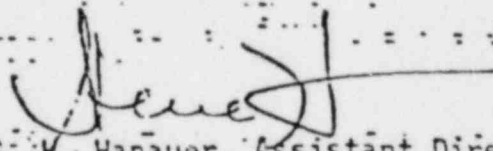
1. Environmental Qualification envelope
2. Things which have to be qualified
3. RG 1.97 implementation
4. Backfitting

Changes in my thinking include:

1. Core damage is credible
2. Long-term plant operation is essential; initiation isn't enough
3. LOCA and SLB may not give an envelope that includes the TMI experience
4. We are relying heavily on things not defined as "safety-related" (Browns Ferry was like that, also)

I believe that we will be required, justifiably, to hasten the pace of review and backfitting decisions. We can't be definitely quantitative until we have better data than now available (for example, dose rates), but we can start thinking in principle.

Please start thinking about this problem. I will set a due date for your ideas as soon as we get off the night shift.


S. H. Hanauer, Assistant Director
for Plant Systems
Division of Systems Safety

cc: G. Arlotto
R. Boyd
R. DeYoung
R. Mattson
D. Ross
J. Sniezek
V. Stello

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