

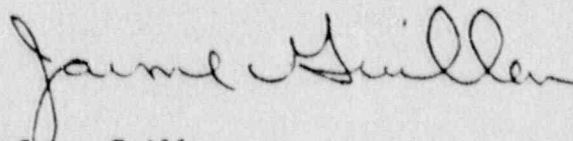
Bob W. providing OGC
comments on 6/7/89.

June 1, 1989

NOTE TO: Stephen Lewis, OGC
FROM: J. Guillen, OGCB
SUBJECT: DRAFT NRC BULLETIN NO. 88-10, SUPPLEMENT 1

NRR has performed a preliminary review of responses to NRC Bulletin No. 88-10 and determined that many responses do not adequately satisfy the provisions of the bulletin. As a result, NRR has prepared a supplement to Bulletin No. 88-10 to request that licensees verify that their responses meet the bulletin provisions and are consistent with NRC positions.

We request that OGC review the enclosed draft supplement and provide comments by June 7, 1989. If you have any questions, please contact me (X2-1170) or Carl Berlinger (X2-1162).



Jaime Guillen
Generic Communications Branch

Enclosure as stated

cc: CHBerlinger

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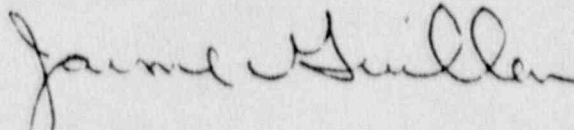
Chase

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Jaime Guillen
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Enclosure as stated

cc: CHBerlinger

8902435

UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF NUCLEAR REACTOR REGULATION
WASHINGTON, D.C. 20555

June , 1989

NRC BULLETIN NO. 88-10, SUPPLEMENT 1: NONCONFORMING MOLDED-CASE
CIRCUIT BREAKERS

Addressees:

All holders of operating licenses or construction permits for nuclear power reactors.

Purpose:

The purpose of this bulletin is to inform addressees that based on a preliminary review of responses to NRC Bulletin No. 88-10, the NRC staff has determined that many responses do not adequately satisfy the provisions of Bulletin No. 88-10 and that some addressees may need to take additional actions. This supplement also provides specific examples of common deficiencies identified during the preliminary review of responses.

Description of Circumstances:

NRC Bulletin No. 88-10 was issued on November 22, 1988, to request that addressees take actions to provide a reasonable assurance that molded-case circuit breakers (CBs) purchased for use in safety-related applications perform their safety functions. In addition, the bulletin requested that addressees submit certain information to the NRC regarding CBs that could not be traced to the circuit breaker manufacturer (CBM).

An NRC staff review of the written reports submitted by addressees in accordance with Bulletin No. 88-10 revealed several common deficiencies. In addition, the NRC staff has received requests for positions on specific issues that were not explicitly addressed in Bulletin No. 88-10. The NRC analyses and positions on these issues are summarized herein.

1. If CBs are traceable to an original plant construction order and the order was procured directly from the CBM, there is reasonable assurance that the CBs are acceptable, and no additional traceability is required. However, if the CB purchase orders were procured from intermediate suppliers, such as panel or motor control center manufacturers, traceability should be established to the CBM in accordance with Bulletin No. 88-10.

2. Visual inspection and physical examination of the CBs by the CBM is not considered adequate to meet the traceability requirements of Bulletin No. 88-10. Although visual inspection and physical examination by the CBM may provide a reasonable basis that the CBs have not been opened or altered in a substantial way, there is no reasonable assurance that the CBs have not been previously used or subjected to service conditions that may have adversely affected the performance capabilities of the CBs.
3. Item 4 of the actions requested applies only to CBs that were purchased and installed after August 1, 1983. However, it is expected that addressees will assess, as currently required by 10 CFR Part 50, Appendix B, the acceptability of installed CBs, regardless of their purchase date, that were procured under the same purchase orders as CBs that are identified as nontraceable during the review requested by Bulletin No. 88-10.
4. Nontraceable CBs that were installed or in stores as of August 1, 1988, and that successfully pass all tests specified in Attachment 1 of Bulletin No. 88-10 are considered acceptable for use as replacements for safety-related CBs that are found to be nontraceable, provided that visual inspections and physical examinations of the CBs reveal no evidence of tampering.
5. Regardless of the number of CBs stored as spares, each individual CB stored for future use in safety-related applications should be reviewed in order to establish proper traceability. For CBs that were not procured directly from the CBM, traceability on a sample basis does not establish traceability for all CBs.
6. All safety-related CBs from the same procurement order are considered traceable if the order was procured directly from a CBM having a quality assurance program consistent with 10 CFR Part 50, Appendix B, if the CBM has been audited in accordance with Appendix B, and if documented evidence has been furnished, such as a certificate of compliance. However, if safety-related CBs were procured from a vendor other than the CBM, a certificate of compliance by itself is not considered an adequate basis for establishing traceability. In such cases, traceability of individual procurement orders should be established through the review of procurement/shipping records back to the CBM. Telephone discussions with the CBM or vendor are not acceptable for establishing a basis for traceability.

Actions Requested:

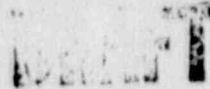
In response to the aforementioned circumstances, addressees are requested to perform the following actions within 30 days from the receipt of this bulletin:

1. Review written reports submitted to the NRC in accordance with Bulletin No. 88-10 and verify that the responses meet the bulletin provisions and are consistent with the above NRC positions.
2. Prepare and retain documentation for possible audit that indicates that item 1 of the actions requested has been performed as requested.

Reporting Requirements:

No written reports are required to be submitted to the NRC by this supplement; however, addressees are required to provide any appropriate corrections to previous responses to Bulletin No. 88-10. The NRC may conduct inspections at selected nuclear power plant sites in order to verify that issues associated with Bulletin No. 88-10 and this supplement have been adequately resolved.

If you have any questions regarding this matter, please contact one of the technical contacts listed below or the regional Administrator of the appropriate NRC regional office.



Charles E. Rossi, Director
Division of Operational Events Assessment
Office of Nuclear Reactor Regulation

Technical Contacts: Uldis Potapovs, NRR
(301) 492-0984

Jaime Guillen, NRR
(301) 492-1170

Attachment: List of Recently Issued NRC Bulletins