

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

July 21, 1981



Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr. Denton:

TVA understands the NRC staff will soon be discussing with the NRC Commissioners extension of the June 30, 1982 deadline for qualification of IE electrical equipment. In the July 7-10 meeting on equipment qualification in Bethesda, TVA described the problems we were having in meeting the June 30, 1982 deadline, and provided some specific examples to Mr. Rosztoczy.

Documentation of the examples cited during the meeting is enclosed. These examples are typical of the problems we are encountering in obtaining qualified components by the June 30, 1982 deadline.

TVA recommends that the June 30, 1982 deadline be suspended and that another arbitrary deadline not be established. Since completion of some of the NUREG-0588 Category I qualification testing and delivery and installation dates for many replacement components remain uncertain, another arbitrary deadline would serve no useful purpose. We therefore recommend that the "deadline" be tied to a replacement schedule established by each utility and reviewed and approved by the NRC staff.

We believe that such an approach is reasonable and should be acceptable to NRC if the utilities provide adequate justification for continued plant operation.

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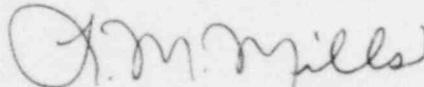
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TVA strongly recommends that NRC give adequate consideration of the impact another arbitrary deadline for electrical equipment qualification will have on the industry's resources and manpower. We believe that there is a very real potential for causing a negative effect on plant safety. We further recommend that this same consideration be given to the schedule for the mechanical equipment and seismic qualification program.

Very truly yours,

TENNESSEE VALLEY AUTHORITY



L. M. Mills, Manager  
Nuclear Regulation and Safety

Enclosure

ENCLOSURE

TVA Browns Ferry and Sequoyah Nuclear Plants  
Typical Examples of Equipment Not Capable of Meeting  
June 30, 1982 Deadline

1. Pressure transmitters (PT) and differential pressure transmitters (<PT), 10-50MA range: Barton appears to be the only source for qualified instruments capable of meeting TVA's requirements. Qualification is expected in October 1981, and procurement lead time would result in delivery in late 1982. This date could be severely delayed if other utilities tax Barton's production capabilities.
2. Pressure switches, differential pressure switches and flow switches: The ASCO models may have to be totally retested to meet qualification requirements. Completion of qualification testing is not expected until February 1983. Comparable Barton instruments lack adequate seismic qualification and would require modification or further testing. Additionally, suppliers will not test to TVA's specific (extreme) environmental conditions. Procurement delivery dates cannot be expected until 1984.
3. Level switches, flow type: Magnetrol appears to be the only source for qualified instruments; however, the qualification testing is not expected until 1983 and delivery in 1984.
4. 4160/480-V transformers: Procurement of qualified replacement components will require significant lead time and delivery is expected in late 1983.