

PDR-016



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

January 17, 1983

Mr. N. K. Agnihotri  
505 N. Lalonde  
Lombard, IL 60148

IN RESPONSE REFER  
TO FOIA-82-432

Dear Mr. Agnihotri:

This is in further response to your letter dated September 13, 1982, in which you requested, pursuant to the Freedom of Information Act, copies of the NRC's staff papers SECY-82-207C and SECY-82-207D.

In further response to your request, enclosed is a copy of SECY-82-207D.

This completes action on your request.

Sincerely,

J. M. Felton, Director  
Division of Rules and Records  
Office of Administration

Enclosure: As stated

August 26, 1982



SECY-82-207D

## RULEMAKING ISSUE

(Affirmation)

For: The Commissioners

From: William J. Dircks  
Executive Director for Operations

Subject: SUPPLEMENT TO SECY-82-207C FINAL RULE, "ENVIRONMENTAL QUALIFICATION OF ELECTRIC EQUIPMENT IMPORTANT TO SAFETY FOR NUCLEAR POWER PLANTS"

Purpose: To supplement SECY-82-207C with respect to the following items:

1. Cold Shutdown

The staff recommends that there be no requirements for cold shutdown included in the subject rule. Specifically, delete paragraph 50.49(b)(4) in SECY-82-207C, Enclosure 1, page 14, "(Equipment needed to complete one path of achieving and maintaining a cold shutdown condition following design basis events.)\*" The staff will address this issue as part of the resolution of Unresolved Safety Issue (USI) A-45, "Shutdown Decay Heat Removal Requirements," which is scheduled for completion by January 1985.

2. Replacement Parts

The staff recommends that, in SECY-82-207C, Enclosure 1, page 20, the first option be adopted, "In kind (identical) replacement parts shall be qualified either in accordance with the DOR Guidelines or NUREG-0588, provided the qualification program for each such part commenced prior to (insert effective date of this rule), or in accordance with this section. Other replacement parts shall be qualified in accordance with the provisions of this section."

3. Status of Regulatory Guide 1.89

To date, 42 comment letters have been received. The staff is presently reviewing and resolving these comments based on the assumption that the rule (SECY-82-207C) will be affirmed. The present plan is to publish the guide in January 1983.

Contact:  
Satish K. Aggarwal, RES  
443-5946

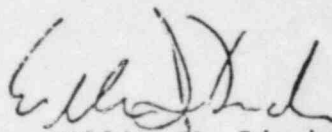
~~8249200462~~

4. Deadline for Completion of Qualification

The rule mandates completion of environmental qualification for operating plants by the end of the second refueling outage after March 31, 1982. (Paragraph 50.49(g), page 17, Enclosure 1 to SECY-82-207C). The second refueling outage for nuclear power plants licensed after McGuire 1 and prior to the effective date of the rule will take place as late as March 1986 based on present estimates. The staff did not intend that the goal of completing environmental qualification extend beyond March 1985. Therefore, the staff recommends that the second sentence in Paragraph 50.49 (g) be modified to read as follows:

"This schedule must establish a goal of final environmental qualification of electric equipment by the end of the second refueling outage after March 31, 1982 or by March 1985, whichever is earlier."

A marked up page 17 is enclosed.



William J. Dircks  
Executive Director for Operations

Enclosure:  
Marked up Page 17  
(SECY-82-207C, Enclosure 1)

in test instruments. These margins are in addition to any conservatisms, applied during the derivation of local environmental conditions of the equipment unless these conservatisms can be quantified and shown to contain appropriate margins.

(f) Each item of electric equipment important to safety must be qualified by one of the following methods:

(1) Testing an identical item of equipment under identical conditions or under similar conditions with a supporting analysis to show that the equipment to be qualified is acceptable.

(2) Testing a similar item of equipment with a supporting analysis to show that the equipment to be qualified is acceptable.

(3) Experience with identical or similar equipment under similar conditions with a supporting analysis to show that the equipment to be qualified is acceptable.

(4) Analysis in combination with partial type test data that supports the analytical assumptions and conclusions.

(g) Each holder of an operating license issued prior to (insert the effective date of this amendment) shall, by (insert a date 90 days after the effective date of this amendment), identify the electric equipment important to safety within the scope of this rule already qualified and submit a schedule for either the qualification to the provisions of this rule or for the replacement of the remaining electric equipment important to safety within the scope of this rule. This schedule must establish a goal of final environmental qualification of electric equipment by the end of the second refueling outage after March 31, 1982 or by March 1985, whichever is earlier. The Director of the Office of Nuclear Reactor Regulation may grant requests for extensions of this deadline to a date no later than November 30, 1985.

From

V. K. AGNIHOTRI  
505 N. LALONDE  
LOMBARD  
IL 60148

9/13/82

FREEDOM OF INFORMATION  
ACT REQUEST

To Mr. Joseph Felton  
Division of Rules & Records  
U.S. NRC  
Washington DC 20555

FOIA-82-432  
Rec'd 9-16-82

Subject: Freedom of Information Act Request

Dear Mr Felton

Please supply me a copy of <sup>207C &</sup> ~~copy~~ papers 207D which were submitted by the NRC staff to the Commissioners around August 25, 1982. Please call me on (314) 932 4 999 if there is any difficulty. The paper is related to "Equipment Qualification".

8208270100  
NR Agnihotri