



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D. C. 20555

MAR 16 1982

Attachment 1

MEMORANDUM FOR: Thomas M. Novak, Assistant Director for
Operating Reactors, DL

THRU: Robert A. Clark, Chief *Robert A. Clark*
Operating Reactors Branch #3, DL

FROM: Robert E. Martin, Project Manger
Operating Reactors Branch #3, DL

SUBJECT: JUSTIFICATION FOR CONTINUED OPERATION OF ANO-2
DURING EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW

54-368

SECY-81-6038 identified ANO-2 as one of the 18 plants without sufficient documented justification for continued operation (JCO) during the ongoing electrical equipment environmental qualification review. We notified Arkansas Power & Light Company (AP&L Co.) of this position during the week of February 1, 1982 and on February 10, 1982 we met with AP&L Co. to discuss development of the JCOs. The licensee's letter dated February 18 and 27, 1982 provided additional information supplementing their September 14, 1981 response to the EEQ SER.

The licensee's February 27, 1982 letter addresses each of the items identified as open in their September 14, 1981 submittal due to insufficient qualification documentation. Based on the information provided the licensee concludes that continued operation is justified.

I have reviewed the licensee's submittal and have determined that the JCOs fall into one or more of the categories listed below. I have also determined that the licensee's February 27, 1982 submittal must be amended to provide clarifying and supplementary information. This information has been identified in conversation with the licensee, who has also agreed to submit the information by letter no later than March 19, 1982.

1. Sufficient information has been identified since September 14, 1981 to support qualification. Therefore the component no longer requires a JCO.

2CV-1506-2	Control Room Emergency
2CV-1509-2/1	Cooling Unit Water Control Valves
2E/H-8829-1	Control and Penetration
2E/H-8830-2	Room EH Damper
2E/H-8831-1	Control Valves
2E/H-8832-2	

DupeCF

8203240420 XA

2. The function performed by the component is also performed by other redundant components and/or other systems.

- | | |
|--|--|
| 2C143 Control Panel for Turbine Driven EFW Pump | (a) Redundant EFW train (Motor Driven Train).
(b) Local manual operation of turbine driven EFW pump.
(c) Feed & Bleed of primary system. |
| 2CV-0340-2 MO - Steam Supply Valve to EFW Pump 2P7A | (a) Redundant EFW Train. |
| 2CV-0711-2 MO - Service Water Valve to EFW Pump 2P7A | (a) Local manual operation.
(b) Redundant EFW train.
(c) Alternate supply paths. |
| 2CV-0795-2 MO - CST Valve to EFW Pump 2P7A | (a) Local manual operation.
(b) Redundant EFW train.
(c) Check valve is redundant to this valve for service water supply to EFW pump. |
| 2CV-1000-1 MO - Steam Supply Valve to EFW Pump 2P7A Turbine for SG 2E24A | (a) Redundant steam source via 2CV-1050-2 from SG 2E24B.
(b) Redundant EFW Train. |
| 2CV-1025-1 Discharge Isolation Valves for EFW Pump to SG's - blowdown line break | (a) Main Feedwater.
(b) Feed & Bleed. |
| 2CV-1026-2
2CV-1037-2
2CV-1038-1
2CV-1039-2 | |
| 2CV-1036-1 Discharge isolation valves for EFW Pump to SG's - HELB | (a) One redundant flow path exists for affected SG.
(b) Two redundant flow paths remain for other SG.
(c) Manually operated cross connect valves could provide other flow paths. |
| 2CV-1075-1 | |
| 2LE-5641-2 Containment Sump Level Indicator | (a) RWST level instruments.
(b) Containment spray flow instruments. |
| 2PIS-0789-1 EFW Pump Suction Pressure Switch | (a) Operating procedures and operator actions do not rely solely on the automatic transfer provided by these switches. |
| 2PIS-0795-2 | |

Note: -Feed and bleed refers to actions identified in the licensee's letters dated 1/31/80 and 12/31/81 in the event heat removal by the secondary system cannot be accomplished.

- 2PM-7B EFW Pump Motor (a) Redundant EFW train.
(b) Feed & Bleed.
- 2SE-0336B-2 Speed Control Sensor for 2P7A EFW Pump (a) Redundant EFW train.
(b) Feed & Bleed.
(c) Local manual operation.
- 2ZS-1016-1 Position Switches for SG Blowdown Isolation Valve (a) Redundant valves.
(b) Flow transmitters.
- 2ZS-1066-1 Position Switches for Reactor Drain Tank Isolation Valve (a) Redundant valves.
- 2ZS-2201-2 Position Switch for Sump ISO Valve (a) Redundant valve.
(b) Sump level instrumentation.
(c) Aux. Bldg. sump level indicator.
- 2ZS-2400 Position Switch for Waste Gas Surge Tank Isolation Valve (a) Redundant Valve.
- 2ZS-3851 Position Switch for Cont. Chilled Water Isolation Valve (a) Redundant Valves.
(b) Flow indication.
- 2ZS-4823-2 Position Switch for Letdown Isolation Valve (a) Redundant Valve.

3. The component will have performed its safety function prior to the development of harsh environmental conditions.

I. Primary JCOs

- 2SY-2061-2 Solenoid Pilot Valve for Isolation Valve in Containment Sump Line.
2SY-2201-2 Solenoid Pilot Valve for Isolation Valve in Reactor Drain Tank Line
2SY-2400-2 Solenoid Pilot Valve for Gaseous Radwaste.
2SY-3851-1 Solenoid Pilot Valve for Chilled Water Isolation Valve.
2SY-3852-1 Solenoid Pilot Valve for Chilled Water Isolation Valve.
2SY-4823-2 RCS Letdown Isolation Valve Pilot.
- 2UCD-8203-1 Containment Cooling Fan Filter Bypass Damper Motors.
2UCD-8209-1 Containment Cooling Fan Filter Bypass Damper Motors.
2UCD-8216-2 Containment Cooling Fan Filter Bypass Damper Motors.
2UCD-8222-2 Containment Cooling Fan Filter Bypass Damper Motors.

2ZS-8203-1 Containment Cooling Fan Bypass Damper Position Switches.
2ZS-8204-1 Containment Cooling Fan Bypass Damper Position Switches.
2ZS-8209-1 Containment Cooling Fan Bypass Damper Position Switches.
2ZS-8210-1 Containment Cooling Fan Bypass Damper Position Switches.
2ZS-8216-2 Containment Cooling Fan Bypass Damper Position Switches.
2ZS-8217-2 Containment Cooling Fan Bypass Damper Position Switches.
2ZS-8222-2 Containment Cooling Fan Bypass Damper Position Switches.
2ZS-8223-2 Containment Cooling Fan Bypass Damper Position Switches.

II. Secondary JCO for items primarily justified as discussed in other sections of this document.

	<u>COMPONENT</u>	<u>SECTION</u>
2PM-60A	LPI Pump Motor	4
2PM-60B	LPI Pump Motor	4
2PM-136A	NaOH Pump Motor	4
2PM-136B	NaOH Pump Motor	4
2ZS-2201-2	Position Switch for Iso. Valve	2
2ZS-2061-2	Position Switch for Iso. Valve	2
2ZS-2400	Position Switch for Iso. Valve	2
2ZS-3851	Position Switch for Iso. Valve	2
2ZS-3852	Position Switch for Iso. Valve	2
2ZS-4823-2	Position Switch for Iso. Valve	2

4. Qualification Testing has been performed on similar type components or materials and/or at parameter levels which are a significant fraction of the value required to demonstrate the qualifications of the subject component.

I. Primary JCOs

2GEN-1001A Containment Electrical Penetration
2GEN-1001B Containment Electrical Penetration
2GEN-1001C Containment Electrical Penetration
2GEN-1001D Containment Electrical Penetration

2M-55A Hydrogen Recombiner
2M-55B Hydrogen Recombiner

2PM-35A Containment Spray Pump Motors
2PM-35B Containment Spray Pump Motors

2PM-60A LPI Pump Motor
2PM-60B LPI Pump Motor

2CV-4698-1 Pressurizer ECCS Vent Valves
2CV-4740 Pressurizer ECCS Vent Valves

2PM-89A HPI Pump Motor
2PM-89B HPI Pump Motor
2PM-89C HPI Pump Motor

2PM-136A NaOH Pump Motor
2PM-136B NaOH Pump Motor

2SY-1010-1A SG MSIV Pilots
2SY-1010-2A SG MSIV Pilots
2SY-1060-1A SG MSIV Pilots
2SY-1060-2A SG MSIV Pilots

2SV-1016-1 SG Blowdown Isolation Pilots
2SV-1016-2 SG Blowdown Isolation Pilots
2SV-1066-1 SG Blowdown Isolation Pilots
2SV-1066-2 SG Blowdown Isolation Pilots

2VSFM-9 CR Ventilation Fan Motor

II. This is a secondary JCO for items primarily justified as discussed in other sections of this document.

<u>COMPONENT</u>	<u>OTHER SECTION</u>
MO for 2CV-0340-2	2
MO for 2CV-0711-2	2
MO for 2CV-0795-2	2
MO for 2CV-1000-1	2
MO for 2CV-5630-1	5
MO for 2CV-5631-2	5
MO for 2CV-5657-1	5
MO for 2CV-5667-2	5

5. Components are not required to mitigate the effects of the event which results in the harsh environment for which the component is not fully qualified.

2CV-5038-1 Shutdown Cooling Line Outboard Containment Isolation Valve.

2CV-5630-2 MO for RWST
2CV-5631-2 Discharge Valve

2CV-5657-1 MO for NaOH
2CV-5667-2 Tank Discharge Valve

2RE-1513-2 Rad. Monitor
2RE-1519-1 Rad. Monitor

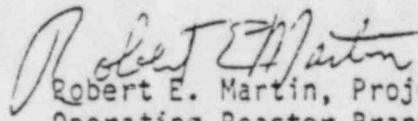
2SV-1016-1 SG Blowdown Isolation Pilots
2SV-1016-2 SG Blowdown Isolation Pilots
2SV-1066-1 SG Blowdown Isolation Pilots
2SV-1066-2 SG Blowdown Isolation Pilots

2VSFM-38A-1 Containment Penetration Room Fan Motor
2VSFM-38B-2 Containment Penetration Room Fan Motor

2VEM-1A CR Emergency Cooling Unit Compressor Motor
2VEM-1B CR Emergency Cooling Unit Compressor Motor

2ZS-5859A-2 Position Switch for SG Sample Isolation Valve

Certain of the JCOs submitted by AP&L Co. on February 27, 1982 must be revised to support these conclusions. Subject to receipt of these revisions which have been agreed to by AP&L Co. I conclude that sufficient detailed information has been provided by the licensee to support his justification for continued operation.


Robert E. Martin, Project Manager
Operating Reactor Branch #3
Division of Licensing

TER-C5257-515

APPENDIX D - REVIEW OF LICENSEE'S RESPONSE TO NRC EEQ
SER CONCERNING JUSTIFICATION FOR INTERIM OPERATION

1. BACKGROUND

The NRC Safety Evaluation Report (SER) concerning equipment environmental qualification (EEQ) states [5]:

"Subsection 4.2 identified deficiencies that must be resolved to establish the qualification of the equipment; the staff requires that the information lacking in this category be provided within 90 days of receipt of this SER. Within this period, the licensee should either provide documentation of the missing qualification information which demonstrates that such equipment meets the DOR guidelines or NUREG-0588 or commit to a corrective action (requalification, replacement, relocation, and so forth) consistent with the requirements to establish qualification by June 30, 1982. If the latter option is chosen, the licensee must provide justification for operation until such corrective action is complete."

On January 19, 1982, FRC representatives met with NRC Division of Licensing personnel at NRC offices to discuss the potential for FRC to assist the staff in the technical review of licensees' statements regarding justification for interim plant operation submitted in response to outstanding qualification deficiencies in the NRC EEQ SERs. The results of the meeting were as follows: (1) FRC was requested to proceed immediately with the technical review of licensees' justification for interim operation, (2) the format was established, and (3) the criteria for the review were established. These criteria are presented in Section 2 of this appendix.

On January 21, 1982, the NRC provided the following modification to Final Assignment 13 concerning this subject:

"The FRC review will consist of:

- o Review the licensee's justification of interim operation and provide FRC independent analysis which shows whether or not licensee provided technically sound rationale as a basis for justification for continued plant operation.

- o On January 27, 1982, FRC shall provide a list of those power reactors that have provided technically sound justification for continued operation. FRC shall also provide a list of those power reactors which have not provided technically sound justification for continued operation. In addition to the lists, FRC may provide any additional information which in FRC's judgment is necessary to support the conclusions regarding justification for continued operation."

On January 25, 1982, the NRC was provided with the completed review of the licensees' statements presented as a basis for justification for interim operation in response to the NRC EEQ SER.* On February 5, 1982, at the NRC's request, the NRC was provided with actual examples of licensees' responses to the NRC EEQ SER that provide adequate rationale as a basis for justification for interim operation.**

2. GENERAL DISCUSSION

In general, licensee-submitted justifications for interim operation are based on systems considerations, equipment operability evaluations, or failure-modes-and-effects analyses.

Systems considerations often involve the availability of backup equipment capable of performing the particular safety function of concern. The backup equipment is either environmentally qualified, unqualified but not exposed to a harsh environment at the same time as the primary equipment, or located so that it is unlikely that both the primary and backup equipment would be simultaneously exposed to a severe environment. In general, these systems discussions should consider (1) the possibility of a single-active failure

* C. J. Crane

Letter to R. A. Clark, NRC. Subject: Transmittal of FRC Review of Licensees' Responses to NRC EEQ SER Concerning Justification for Interim Operation
FRC, 25-Jan-82

** C. J. Crane

Letter to R. A. Clark, NRC. Subject: Transmittal of Actual Examples of Licensees' Responses to NRC EEQ SER Which Provide Adequate Rationale as a Basis for Justification of Interim Operation
FRC, 5-Feb-82

disabling the backup equipment, (2) any major differences in the characteristics of the primary and backup equipment (unless it is obvious that the equipment is essentially identical), (3) the possibility of electrical failure of the primary equipment causing an adverse effect on other safety-related equipment or power supplies, and (4) in the case of display instrumentation, the possibility of an operator being misled by the failed primary equipment. Where equipment has not been demonstrated to be qualified, some justifications discuss administrative procedures or revised operating procedures in effect. Depending upon the specific equipment involved, each of the above considerations need not be discussed in every instance, but, in general, a complete systems discussion would consider the above points.

Where equipment qualification evaluations were used, licensees generally (1) received additional information from manufacturers, (2) applied engineering judgment, (3) performed material analysis, and/or (4) used partial test data in support of the original qualification documentation. Where these evaluations were performed, the licensees determined that, although full qualification was not documented, there was sufficient evidence to suggest that the equipment would perform its intended safety function, thereby justifying interim operation until qualified equipment is installed.

Some licensees provided detailed failure-modes-and-effects analyses of electrical circuitry to demonstrate that, under all identified failure modes, the safety function of the equipment could still be accomplished.

Other justifications involved a combination of qualification information and systems information. For example, if a licensee has qualification information (such as a generic test report or other partial qualification documentation) that tends to confirm the ability of the equipment to remain operable for a specified period of time, justification for interim operation often was based upon a discussion of the required safety function being performed prior to the potential failure. This type of discussion often applies to equipment which performs a short-term trip or isolation function in the early stages of an accident.

3. PLANT-SPECIFIC REVIEW

As a result of the review, this plant was evaluated and the results documented on the "Summary of Review of Licensee's 90-Day Response" form reproduced below:

"EQUIPMENT ENVIRONMENTAL QUALIFICATION (EEQ)
Review of Licensees' Resolution of Outstanding Issues
From NRC Equipment Environmental Qualification
Safety Evaluation Reports

SUMMARY OF REVIEW OF LICENSEE 90-DAY RESPONSE

Utility: Arkansas Power and Light Company
Plant Name: Arkansas Nuclear One Unit 2
NRC Docket No. 50-368
NRC TAC No. 42496
NRC Contract No. NRC-03-79-118
FRC Project No. C5257
FRC Assignment No. 13
FRC Task No. 515

References:

- a. D. C. Trimble
Letter to R. A. Clark (NRC). Subject: Arkansas Nuclear One Unit 2;
Response to NRC Safety Evaluation Report on Environmental
Qualification of Safety-Related Electrical Equipment
Arkansas Power & Light Co., 14-Sep-81
2CAN098105
- a.1 NUS Corporation, Southern Operations
Electrical Equipment Environmental Qualification Assessment for
Arkansas Nuclear One Unit 2
Arkansas Power & Light Co., 12-Sep-81
- b. Office of Nuclear Reactor Regulation
Safety Evaluation Report for Arkansas Nuclear One-Unit 2
Environmental Qualification of Safety-Related
Electrical Equipment
NRC, 22-May 1981

The Licensee has submitted technical information in Reference a in response to the NRC SER [b] on environmental qualification. FRC has reviewed these documents [a, b]. As a result of this review, FRC concludes that the Licensee has stated that the equipment items are environmentally qualified; or has provided only a general statement as a basis for justification for continued plant operation (see Section 6 of Reference a).

The Licensee has stated in Reference a:

'By letter dated May 22, 1981, the NRC forwarded its Safety Evaluation Report (SER) on Environmental Qualification of Safety-Related Electrical Equipment for Arkansas Nuclear One - Unit 2 (ANO-2) and requested a response within 90 days. By letter dated August 4, 1981, AP&L requested additional time in which to prepare our response. However, following several telephone conversations with Mr. Mark Williams of your staff, AP&L agreed to accelerate our schedule in order to forward our response as closely to the requested date as possible. This was subsequently documented by our letter of August 27, 1981. As noted in our August 27, 1981 letter, the accelerated schedule has resulted in a less complete response than originally planned.

Due to the stringent schedule requirements imposed by the NRC, our October 31, 1980 submittal was incomplete in many respects. This submittal contains a revision of data previously transmitted by letters dated October 31, 1980 and February 1, 1981. This revision includes substantial amounts of new data as well as changes to the component lists and data summary sheets. Second, this submittal provides AP&L's response to the subject SER.

As discussed above, this submittal constitutes an extensive revision to previously submitted material. Attachment 2, Electrical Equipment Environmental Qualification Assessment for Arkansas Nuclear One-Unit 2, supersedes material submitted on October 31, 1980, and February 1, 1981. Due to the significant additional data now available and the briefness of the SER description of open items, we have not attempted to respond to or correlate our response directly to Appendix B of the SER. Also due to apparent difficulties in reproduction of data sheets, there has been some difficulty establishing the component identification numbers from the item numbers used in the SER.

Attachment 1, Summary of Open Items, consists of a table of open items as determined by our review. Aging is not included in the table due to its generic nature. Also included in the tables is an indication of our current plans to address these open items. In many instances the planned corrective action is not yet finalized due to insufficient data and time. We will continue in our efforts to resolve these open items in a timely manner. The list of open items is based on the updated summary sheets contained in Attachment 2. Details of our review are also included in Attachment 2.

As stated in our previous submittals and in the SER itself, we feel the remaining open items do not indicate significant problems which affect the safe operation of ANO-2. These open items are the result of review against guidelines which interpret applicable regulations differently than the interpretation accepted at the time ANO-2 was licensed.

This submittal represents, with few exceptions, a summary of all available environmental qualification documentation applicable to ANO-2. We hope the attached information will receive a meaningful review by the NRC staff and we will work with the staff to resolve any questions arising from your review. However, pending further input from the NRC, we plan to use the submittal as the basis for planning needed actions in our efforts to comply with pending NRC orders on equipment qualification.

In FRC's judgment, the Licensee's submittal did not adequately address the deficiencies identified in the SER and provided only a general statement regarding justification for interim operation.

In addition, the Licensee's corrective action (listed below) indicates that it has not yet reached definitive resolution on a number of items.*

Corrective Action

- *A - Analysis or Evaluation
- *TIP - Testing in Progress
- *TBD - To Be Determined
- *M - Manufacturer and Model to be determined and qualification evaluated.
- *DV - Documentation to be verified.

The Licensee's notes (listed below) used for explanation of outstanding items on component work sheets were superficial.

'ANO-2

COMPONENT WORKSHEET NOTES

The following notes are used for explanation of outstanding items on the component worksheets.

Note 1:

Aging evaluation is currently in progress.

Note 2:

Materials subject to spray are capable of withstanding much more harsh spray.

Note 3:

Similar units have been sprayed.

Note 4:

Open item. Corrective action to be specified by Arkansas Power & Light.

Note 5:

Qualification records will be verified.

Note 6:

Testing is currently in progress.

Note 7:

The component will complete its function before spray starts.

Note 8:

Believed to be similar to type EAO motor. Verification is in process.'

In Reference a, the Licensee has provided the following general statement as a basis and justification for continued operation:

'At the time of issuance of the construction permit and during a large portion of the time the design was developed, IEEE 323-1971 was not a requirement for ANO-2. However, that standard and other appropriate standards (including IEEE 334-1971 and IEEE 383-1972 and NRC Regulatory Guide 1.73) were referenced in the design and qualification testing of in-containment process instrumentation, isolation valves, and other components. Chapter 3.11 of the ANO-2 FSAR discusses in detail the environmental design of the mechanical and electrical equipment. That chapter includes the following statements:

Class I process instrumentation is qualified and capable of operating in the environment and application intended. Every reasonable effort was made to establish this qualification in accordance with IEEE 323-1971; however, the documented results are not in complete conformance to Section 4.3 and 5. IEEE-323-1971 was not a requirement for ANO-2 at the time of issuance of the construction permit and was not invoked as a Specification requirement for process instrumentation supplied by C-E as indicated above.

Equipment located in the containment and required for LOCA were type tested for DBA conditions. Also, all Class I instrumentation was seismically type tested. Other environmental requirements were established, but since the temperature and humidity are normal design conditions for which the electronic equipment had been designed and operated, re-testing was not made a requirement just for documenting information which is readily found in sales specification brochures. The DP and pressure transmitters were tested for temperature error as part of the final acceptance and calibration tests. Also, operating experience with this equipment has been gained on nuclear and industrial plants.

During the later stages of licensing, ANO-2 was committed to IEEE 323-1971 (modified by testing sequentially) for safety-related equipment inside containment.

Regarding out-of-containment equipment, the harsh environment specified was the result of a LOCA and recirculation of emergency core cooling fluid. The radiation environment for equipment required to operate following a LOCA (including equipment located outside the containment) was based on a fission product release source consisting of 50 percent of the core halogen inventory, 100 percent of the core noble gas inventory, and 1 percent of the core solid fission product inventory. This resulted in a specified radiation resistance requirement of 10^7 RAD for the shutdown heat exchanger rooms, emergency feedwater pump rooms, and

high-pressure safety injection pump rooms. Above-normal-ambient temperatures were also specified. See the ANO-2 FSAR, Section 3.11, and Table 3.11-1 for further information.

Conservative analyses have been performed to determine the thermal-hydraulic and radiation environments outside the containment following a LOCA and HELB's outside containment, as described in Section 4.2 of this document. The results of these analyses are indicated on the component worksheets.

It is concluded, therefore, that the LOCA and inside-containment HELB have been adequately addressed in the design of the unit. As noted in the FSAR, the documentation of equipment qualification is not in complete conformance. It is concluded, based on the information in this report and the FSAR, that there is reasonable assurance that the health and safety of the public will not be endangered.

The HELB outside containment, as compared to the LOCA, is much less severe in terms of temperature and pressure, is of much shorter duration, and does not entail potentially damaging radiation exposures. Many of the systems and components required for accident mitigation and safe shutdown are the same ones required for the inside containment events. As discussed above, those were subject to operability requirements with radiation exposure and above-normal temperatures. The remainder of equipment and components were specified for nuclear plant service, and are also expected to be capable of withstanding the HELB transient conditions.

In any event, further refinements of the accident analysis and consideration of additional accident events do not decrease the margin of safety with which ANO-2 was licensed.

AP&L's position relative to continued safe operation of ANO-2 was stated in the response to IEB 79-01B and reiterated in response to NRC's letter of February 25, 1981.'

In summary, FRC concludes that: (1) the Licensee has not completed its response to the qualification deficiencies stated in the SER; (2) the Licensee was superficially responsive to the SER; (3) the Licensee's corrective action indicates that it has not yet reached a definitive resolution on many items; and (4) the Licensee's general statement regarding plant safety does not provide an adequate technical basis as a justification for continued operation in light of specific qualification deficiencies. It is recommended that the Licensee complete its response to the SER and specifically reevaluate the rationale stated as justification for continued operation in light of the stated qualification deficiencies."

4. SUBSEQUENT REVIEW

As a result of FRC's review of the Licensee's 90-day response, described in Section 3 above, further discussions were held between the NRC staff and Licensee personnel. Following these discussions, the Licensee provided additional information regarding justification of interim operation. These justifications were provided on an item-by-item basis for each equipment item not fully documented as environmentally qualified in the Licensee's 90-day submittal.

Evaluation

The justifications for interim operation provided by the Licensee in a letter dated March ¹⁸ 1982 have been reviewed and it is concluded that the Licensee has provided sufficient technical basis to support interim operation in the case of the identified equipment items.