



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS  
WASHINGTON, D. C. 20555

May 12, 1982

The Honorable Nunzio J. Palladino  
Chairman  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Dr. Palladino:

Subject: RULEMAKING ON ENVIRONMENTAL QUALIFICATION OF ELECTRIC EQUIPMENT

During its 265th meeting, May 6-8, 1982, the ACRS considered the proposed final rule, "Environmental Qualification of Electric Equipment for Nuclear Power Plants." A Subcommittee meeting was held in Washington, DC on May 5, 1982 to discuss this matter with the NRC Staff. The proposed rule was considered, before it was issued for public comments, during a Subcommittee meeting on July 22, 1981 and during the 256th ACRS meeting, August 6-8, 1981.

Before the rule was published for public comments, the requirements for seismic qualification were deleted and a requirement was added that equipment needed to provide one path for achieving and maintaining a cold shutdown condition must be environmentally qualified. After public comments were received, the latter qualification requirement was deleted from the final rule. The rule will be applicable to a wide variety of equipment which must perform under a range of circumstances that affect the qualification requirements. We note that deferment of the seismic response and cold shutdown requirements fragments the qualification.

We understand that Revision 1 of Regulatory Guide 1.89, "Environmental Qualification of Electric Equipment for Nuclear Power Plants," which accompanied the proposed rule when reviewed by the ACRS in 1981, cannot be issued before late in 1982. We recommend that revision and issuance of this guide be given priority to expedite its availability to the industry. Concurrent availability of the proposed rule and revised guide would significantly help the industry to understand and implement equipment qualification under the rule.

Industry has claimed that it will be difficult to comply with the new rule and that heavy financial burdens will be incurred in qualifying equipment. We understand that a sufficient amount of information from current qualification reviews of a number of operating and NTOL plants is available and can be used to test the practicality of applying the rule as revised. Since these plants are qualifying equipment in accordance with the "DOR Guidelines" and NUREG-0588, which the new rule is intended to codify, we suggest that analysis of the available information be performed before completion of the rulemaking to effectively demonstrate its practicality and its value in reducing public risk. It would be prudent to undertake such a demonstration.

820527-0609 AP

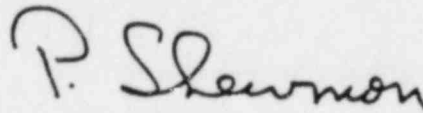
Honorable Nunzio J. Palladino

- 2 -

May 12, 1982

We believe that the Staff and industry viewpoints have been effectively reconciled in the public interest and recommend approval of the rule subject to consideration of the foregoing comments.

Sincerely,

A handwritten signature in cursive script that reads "P. Shewmon". The signature is written in dark ink and is positioned above the typed name and title.

P. Shewmon  
Chairman