TECHNICAL EVALUATION REPORT

REVIEW OF LICENSEES' RESOLUTION OF OUTSTANDING ISSUES FROM NRC EQUIPMENT ENVIRONMENTAL QUALIFICATION SAFETY EVALUATION REPORTS (F-11 AND B-60)

ROCHESTER GAS AND ELECTRIC CORPORATION R. E. GINNA STATION

NRC DOCKET NO. 50-244

NRC TAC NO. 42520

NRC CONTRACT NO. NRC-03-79-118

FRC PROJECT C5257

FRC ASSIGNMENT 13

Docket File

FRC TASK 454

Prepared by

Franklin Research Center 20th and Race Street Philadelphia, PA 19103

Prepared for

8207010149 XA

Nuclear Regulatory Commission Washington, D.C. 20555

FRC Group Leader: C. J. Crane

Lead NRC Engineer: N. B. Le

P. Shemanski

May 28, 1982

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A Division of The Franklin Institute The Benjamin Franklin Parkway, Phila, Pa 19103 (215) 448-1000

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FOREWORD

This Technical Evaluation Report was prepared by Franklin Pesearch Center under a contract with the U.S. Nuclear Regulatory Commission (Office of Nuclear Reactor Regulation, Division of Operating Reactors) for technical assistance in support of NRC operating reactor licensing actions. The technical evaluation was conducted in accordance with criteria established by the NEC.

Principal contributors to the technical preparation of this report were C. J. Crane, J. A. Murphy, K. E. Weise, D. J. Schmitz, and K. J. Iepson of the Franklin Research Center.

T. J. DelGaizo from WESTEC Services, Inc., R. Garrison from ORFI Systems, Inc., and M. A. Fedele from Evaluation Associates, Inc., also concributed to the technical preparation of this report through subcontracts with Franklin Research Center.

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IDENTIFICATION OF PROPRIETARY INFORMATION

Some of the information in this technical evaluation report was obtained from manufacturers' proprietary test reports. All proprietary test reports are identified as such in Section 6, References, of this report. Checksheets in Section 4 containing proprietary information have been replaced with a checksheet page stating that the proprietary information has been removed.



1. INTRODUCTION

1.1 PURPOSE OF THE EVALUATION

The purpose of this report is to:

- evaluate licensees' resolutions of outstanding issues related to safety-related electrical equipment environmental qualification (EEQ) discussed in the Nuclear Regulatory Commission (NRC) Safety Evaluation Reports (SERs) in accordance with NRC criteria. The objective is to identify all cases where a licensee's response has not resolved the significant qualification issues.
- o evaluate licensees' qualification documentation of safety-related electrical equipment located in harsh environments in accordance with criteria established by the NKC and to identify (1) equipment for which qualification documentation is adequate, i.e., substantiates that the equipment is capable of performing its specified design basis safety function when it is exposed to a harsh environment and (2) equipment for which qualification documentation is deficient, i.e., does not give reasonable assurance that the equipment is capable of performing its specified safety function.
- evaluate licensees' qualification documentation of safety-related electrical equipment located in harsh environments required for TMI Lessons Learned Implementation. The objective is to evaluate qualification documentation of equipment within the scope of IE Bulletin 79-01B, Supplement 3 (item 2) [56],* in accordance with criteria established by the NRC in a manner identical to the evaluation of all other safety-related electrical equipment.

1.2 SCOPE OF THE EVALUATION

The scope of this report is limited to the evaluation of environmental qualification of electrical equipment that must function to mitigate the consequences of a loss-of-coolant accident (LOCA) or high energy line break (HELB) and whose environment is adversely affected by that event.

*For References, see Section 6. Note that reference numbers are not presented in sequential order.

With respect to TMI Action Plan Implementation, the scope of this report is limited to those sections of NUREG-0737 [82] applicable to equipment having an installation implementation date of January 1, 1981. Where applicable, a review is to be performed on installed equipment with implementation dates after January 1, 1981 if adequately identified by the Licensee.

The NRC has determined that the evaluation of environmental qualification of equipment items (1) located in plant areas whose environment is not adversely affected by the design basis event (DBE) (e.g., equipment located in "mild" environments) or (2) required to achieve and maintain cold shutdown, is not to be included within the scope of this report. However, where the Licensee has identified these equipment items in the EEQ submittals to the NRC, these items have been listed in NRC evaluation Category III.b in this report (see Section 3 of this report for definition of NRC evaluation categories).

Qualification aspects not included within the scope of this evaluation are:

- o seismic and dynamic qualification
- o equipment protection against natural phenomena
- equipment operational service conditions (e.g., vibration, voltage, and frequency deviations)
- o equipment located where it is subjected to the outdoor environment
- o equipment protection against fire hazards
- o equipment protection against missiles
- o equipment located in plant areas whose environment is not adversely affected by the design basis event
- o equipment required to achieve and maintain cold shutdown.

1.3 GENERIC ISSUE BACKGROUND

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Safety-related electrical equipment must be capable of performing design safety functions under all normal, abnormal, and accident conditions. The purpose of equipment qualification is to provide tangible evidence that equipment will operate on demand and to verify design performance, thereby establishing assurance that the potential for common-mode failure is minimized.

Of particular concern is the assurance that equipment will remain operable during and following exposure to the harsh environmental conditions (i.e., temperature, pressure, humidity [steam], chemical sprays, radiation, and submergence) imposed as a result of a design basis accident. These harsh environments are generally defined by the limiting conditions resulting from the complete spectrum of postulated break sizes, break locations, and single failures consequent to a LOCA, main steam line break (MSLB) inside the reactor containment, or a HELB outside the reactor containment (such as a main steam or feedwater line break). In addition, depending on specific plant design features, other postulated HELB locations may be associated with:

- o the chemical and volume control system (CVCS) letdown line
- o the steam supply piping to

- the auxiliary feedwater (AFW) pump turbing
- the reactor core isolation cooling (RCIC) pump surbine
- the high pressure core injection (HPCI, pump turbine
- the isolation condenser
- o steam generator blowdown.

The NRC criteria for reviewing the safety of muciear power generating stations include the requirement that the qualification of safety-related electrical equipment be substantiated by auditable documentation of the program that establishes the ability of the equipment to function as specified in the station design. This report is restricted to a technical evaluation of the equipment's ability to function in harsh environments resulting from DEfs.

Qualification criteria applied during the liceosing of the older nuclear power plants have been modified over the years, and specific industry standards concerning qualification have been revised as the design of reactor systems has changed and as regulatory and operating experience has accumulated. Examples of such standards are IEEE Standards 279-71, 323-74, 383-74, 317-76, 334-80, 381-77, 382-80, 535-79, 627-80, 649-80, and 650-79. NRC NUREG documents 0413 and 0588 have been developed to address this topic. In particular, NUREG-0588 (published for comment in December 1979 and reissued as Revision 1 in July 1981) formally presented the NRC staff positions regarding selected areas of environmental qualification of safety-related electrical equipment in the resolution of General Technical Activity A-24,

"Qualification of Class IE Safety Related Equipment." In 2 positions documented therein are applicable to plants that are or will be in the construction permit or operating license revie process.

Although qualification standards and regulatory requirements have undergone considerable development, all of the currently operating nuclear power plants are required to comply with 10CFR50, Appendix A, General Design Criteria for Nuclear Power Plants, Section I, Criterion 4. This criterion states in part that "structures, systems and components important to safety shall be designed to accommodate the effects of and to be compatible with the environmental conditions associated with normal operation, maintenance, testing and postulated accidents, including loss-of-coolant accidents."

Qualification requirements are also embodied in (1) 10CFR50 Appendix A, General Design Criteria 1, 2, and 23 and (2) 10CFR50 Appendix B, Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants, Criteria III, "Design Control," and XI, "Test Control." These requirements are applicable to safety-related equipment located outside as well as inside containment.

The NRC staff has evaluated the licensees' equipment qualification programs by reviewing the qualification documentation of selected safetyrelated equipment as part of the operating license review for each plant. The NRC staff has also used a variety of methods to assure that these general requirements are met for electrical safety-related equipment. In the oldest plants, qualification was based on the fact that electrical components were of high industrial quality. After 1971, qualification was judged on the basis of IEEE Std 323-71; however, no regulatory guide was issued adopting this standard. For plants whose SERs were issued after July 1, 1974, the Commission issued Regulatory Guide 1.89, which in most respects adopted the most recent standard, IEEE Std 323-74.

In November 1977, the Union of Concerned Scientists petitioned the NRC Commissioners to upgrade current standards for the environmental qualification of safety-related electrical equipment in operating plants. Subsequently, the NRC staff instituted the Systematic Evaluation Program (SEP) to determine the degree to which the older operating nuclear power plants deviated from current

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licensing criteria. The subject of electrical equipment environmental qualification (SEP Topic III-12) was selected for accelerated evaluation as part of this program. Seismic qualification of equipment was to be addressed as a separate SEP topic. In December 1977, the NRC issued a generic letter to all SEP plant licensees requesting that they initiate reviews to determine the adequacy of existing equipment qualification documentation.

Preliminary NRC review of licensee responses led to the preparation of NUREG-0458, an interim NRC assessment of the environmental qualification of electrical equipment. This document concluded that "no significant safety deficiencies requiring immediate remedial actions were identified." However, it was recommended that additional effort should be devoted to examining the installation and environmental qualification documentation of specific electrical equipment in all operating reactors.

On May 31, 1978, the NRC Office of Inspection and Enforcement issued IE Circular 78-08, "Environmental Qualification of Safety-Related Electrical Equipment at Nuclear Power Plants," which required all licensees of operating plants (except those included in the SEP) to examine their installed safety-related electrical equipment and ensure appropriate qualification documentation for equipment function under postulated accident conditions. Subsequently, on February 8, 1979, the NRC Office of Inspection and Enforcement issued IE Bulletin 79-01, which was intended to raise the threshold of IE Circular 78-08 to the level of Bulletin, i.e., action requiring a licensee response. This Bulletin required a complete re-review of the environmental qualification of safety-related electrical equipment as described in IE Circular 78-08.

The review of the licensees' responses indicated certain deficiencies within the scope of equipment addressed, definition of harsh environments, and adequacy of support documentation. It became apparent that generic criteria were needed for evaluating the electrical equipment environmental qualification for both SEP and non-SEP operating plants. Therefore, during the second half of 1979, the Division of Operating Reactors (DOR) of the NRC issued internally a document entitled "Guidelines for Evaluating Environmental Qualification of Class IE Electrical Equipment in Operating Reactors" [54]. (The document is hereafter

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referred to as the "DOR Guidelines.") The document was prepared as a screening standard for reviewing all operating plants, including SEP plants. It was originally intended that the licensees evaluate their qualification documentation in accordance with the DOR Guidelines. However, initial NRC review of this documentation, which was compiled to support licensee submittals, revealed the need for obtaining independent evaluations and for accelerating the qualification review program.

In October 1979, the NRC awarded Franklin Research Center a contract to provide assistance in the "Review and Evaluation of Licensing Actions for Operating Reactors," which included an assignment for review of equipment environmental qualification documentation under SEP Topic III-12. The assignment was to review equipment environmental qualification documentation and to present the results in the form of a Technical Evaluation Report for the 11 oldest plants (included in the SEP review). The plants included within the assignment were the Palisades, Oyster Creek, Ginna, Haddam Neck, Yankee Rowe, LaCrosse, and Big Rock Point plants and Zion Station Units 1 and 2, Indian Point Units 2 and 3, Millstone Unit 1, Dresden Unit 2, and San Onofre Unit 1. (This assignment was completed in April 1981.)

On January 14, 1980, the NRC Office of Inspection and Enforcement issued the DOR Guidelines and IE Bulletin 79-01B, which expanded the scope of IE Bulletin 79-01 and requested additional information on environmental qualification of safety-related electrical equipment at operating facilities, excluding the 11 facilities undergoing the SEP review. This Bulletin cited the DOR Guidelines as the criteria to be used in evaluating the adequacy of the safetyrelated electrical equipment qualification. The scope of the review was expanded to include HELBS (inside and outside containment) in addition co equipment aging and submergence. The NRC advised the licensees that the criteria contained in the DOR Guidelines would be used in its review of licensee submittals; NUREG-0588 would be used as a guide in cases where the DOR Guidelines do not provide sufficient detail.

In early February 1980, the NRC decided that Indian Point Units 2 and 3 and Zion Station Units 1 and 2 should be included within SEP Topic III-12 for the purpose of equipment environmental qualification review.

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On February 21, 1980, the NRC and representatives of the SEP Plant Gwners Group held an open meeting at NRC headquarters to discuss an accelerated review program in accordance with the DOR Guidelines. Representatives of the Indian Point Units and Zion Station also attended this meeting. The NRC formally issued to all licensees represented at the meeting the DOR Guidelines document which included a second document, "Guidelines for Identification of That Safety Equipment of SEP Operating Reactors for Which Environmental Qualification Is To Be Addressed" [54], together with the request that the licensees review their plant systems and provide additional equipment environmental qualification information to the NRC on an accelerated schedule.

For non-SEP plants, the NRC Office of Inspection and Enforcement formed a task force including a principal reviewer in each region and a task leader from headquarters. The regional members were assigned responsibility for the technical review of the licensees' responses to IE Bulletin 79-013, and the task leader was assigned responsibility for the overall coordination of the review effort with NRC staff to assure overall consistency. The regional reviewers held meetings with the licensees in their respective regions, which resulted in staff positions being issued in a supplement to IE Bulletin 79-01B dated February 29, 1980.

In April 1980, the NRC organizational structure was modified and the Equipment Qualification Branch was formed within the new Division of Engineering. Responsibility for reviewing the status of equipment qualification for all plants was assigned to this branch.

On May 23, 1980, the NRC issued Memorandum and Order CLI-80-21 [57], specifying that licensees and applicants must meet the requirements set forth in the DOR Guidelines and NUREG-0588 regarding environmental qualification of safety-related electrical equipment in order to satisfy 10CFR50, Appendix A, General Design Criteria, Section I, Criterion 4. This Order also established that the SERs on this subject, to be prepared by the NRC staff, must be issued on February 1, 1981 and that all subsequent actions to be taken by licensees to achieve full compliance with the DOR Guidelines or NUREG-0588 must be completed no later than June 30, 1982. The Memorandum and Order established the DOR Guidelines and NUREG-0588 as acceptable interpretations of the General

Design Criteria for an interim period. Rulemaking was proposed for the purpose of establishing a permanent interpretation of the General Design Criteria.

The staff held regional meetings with the licensees and interested parties during the week of July 13, 1980. The staff issued a second supplement to IE Bulletin 79-01B, a response to significant questions raised during the public meetings, and two Orders. The Order dated May 30, 1980 required the licensees to comply with the previously issued Commission Memorandum and Order of May 27, 1980 (CLI-80-21). The above orders required the licensees to complete the tasks identified in UE Bulletin 79-01E no later than November 1, 1980 to allow the staff to comply with the February 1, 1981 date imposed by the Commission Order. The responses to the questions were issued on February 29, 1980; and the second and third supplements to IE Bulletin 79-01B, highlighting the staff positions affecting the licensees' responses, were issued on September 29 and October 24, 1980, respectively.

In October 1980, EG&G Idaho, Inc., awarded Franklin Research Center a contract to provide assistance in the equipment environmental qualification review for 13 of the plants whose licensees responded to IE Bulletin 79-01B. The assignment was to evaluate the licensees' equipment environmental qualification submittals and to present the results in the form of a Technical Evaluation Report for each plant. The objective of this Technical Evaluation Report was to review the licensees' submittals to determine if safety-related electrical equipment was reviewed for environmental qualification in accordance with the DOR Guidelines and NUREG-0588 as required by IE Bulletin 79-01B. The NRC was to perform an audit of the qualification documentation references as part of its Safety Evaluation Program. If discrepancies were found, the audit was to be extended. The plants included within this assignment were Nine Mile Point Unit 1, Millstone Unit 2, Salem Unit 1, Browns Ferry Units 1, 2, and 3, Brunswick Units 1 and 2, Hatch Units 1 and 2, Dresden Unit 3, and Quad Cities Units 1 and 2. (This assignment was completed in June 1981.)

In mid-1981, the NRC issued SERs on environmental qualification of safety-related electrical equipment to licensees of all operating plants.

Where additional qualification information was required, the licensees were directed to respond to the NRC within 90 days of receipt of the SER.

In May 1981, under the licensing action assistance contract, NRC authorized Franklin Research Center to proceed with the review and evaluation of the environmental qualification of safety-related electrical equipment located in harsh environments, required for TMI Lessons Learned Implementation on 71 operating plants.

In July 1981, the NRC conducted extensive meetings with the nuclear industry to address concerns and questions regarding qualification of safetyrelated equipment. In addition, the NRC provided licensees with detailed information with respect to the format and expected content of the licensees' 90-day responses to the NRC SERs. Draft outlines of the following proposed programs were also presented to the industry: environmental qualification of equipment located in "mild" environments, seismic and dynamic qualification, and environmental qualification of mechanical equipment.

On September 23, 1981, the NRC Commissioners considered a petition (SECY-81-486) to extend the deadline for actions to be taken by licensees to achieve environmental qualification of all safety-related equipment. On September 30, 1981, the NRC Commissioners extended this deadline to the second refueling outage after March 31, 1982.

In October 1981, the NRC authorized Franklin Research Center to include within the scope of the existing EEQ assignment (TMI Lessons Learned Implementation Equipment) the evaluation of licensees' resolutions of outstanding issues related to equipment environmental qualification discussed in the NRC SERs in accordance with NRC criteria. The assignment was to review the qualification documentation and to present the results in the form of a Technical Evaluation Report for 71 operating plants. (This report was developed within the scope of this assignment.)

On January 7, 1982, the NRC Commissioners approved the issuance of the proposed rule, "Environmental Qualification of Electric Equipment for Nuclear Power Plants," for public comment. The proposed rule was published in the Federal Register (Volume 47, No. 13) dated January 20, 1982.

In February 1982, Proposed Revision 1 to Regulatory Guide 1.89, "Environmental Qualification of Electric Equipment for Nuclear Power Plants," was issued for public comment. This regulatory guide was issued to (1) reflect current NRC positions on equipment qualification and (2) provide guidelines for meeting the NRC Commissioners proposed rule on equipment qualification.

The final rule, "Environmental Qualification of Electric Equipment for Nuclear Power Plants," was subsequently issued on April 16, 1982 by the NRC (to be published in the Federal Register) to clarify and strengthen the criteria for environmental qualification of electrical equipment. The final rule is to be incorporated into 10CFR50 as Section 50.49, "Environmental Qualification of Electric Equipment for Nuclear Power Plants." The significant features of the rule are:

- Requalification of electrical equipment in accordance with the rule will not be required for equipment qualified or being qualified in accordance with the DOR Guidelines and IE Bulletin 79-01B or NUREG-0588, provided the qualification program commenced within 90 days after the effective date of the rule.
- The requirement to qualify equipment needed to complete one path of achieving and maintaining a cold shutdown condition has been deleted.
- A new section has been added, covering the qualification of equipment located in mild environments.
- The Commission deadline for actions to be taken by licensees to achieve environmental qualification of all safety-related equipment is extended to the second refueling outage after March 31, 1982.

On April 20, 1982, the NRC staff issued Generic Letter No. 82-09 [96] to all licensees, presenting the NRC's position and clarification of certain aspects of the environmental qualification requirements.

1.4 SPECIFIC ISSUE BACKGROUND

By a letter dated December 15, 1977, Rochester Gas and Electric Corporation (RG&E) was requested by the NRC to address the envrionmental qualification of safety-related electrical equipment installed in the R. E. Ginna Station. Information requested included indentification of electrical

equipment required to perform safety functions while subjected to design basis accident environments, definitions of environmental service conditions at equipment locations, and the status of environmental qualification documentation. In response to this request, RG&E provided information via submittal letters dated February 24 and December 1, 1978 (Revision 1) [44, 45].

On February 15, 1980, NRC qualification guidelines for identification and evaluation of safety-related equipment were transmitted to RG&E. By letters dated March 6 and 28, 1980, the NRC provided further guidance and a schedule to RG&E concerning submittal of qualification information.

On April 25, 1980, RG&E transmitted Revision 2 of its equipment qualification submittal to the NRC [52].

During the week of May 5, 1980, NRC and FRC representatives visited the Ginna plant site, conducted a general overview of the April 25, 1980 submittal, and inspected safety-related systems and equipment.

On May 22 and May 29, 1980, RG&E submitted additional information which supplemented the April 25, 1980 submittal.

On August 20, 1980, a Draft Interim Technical Evaluation Report (DITER) for equipment environmental qualification on the R. E. Ginna Station [75] was issued.

On October 7, 1980, representatives of the NRC, RG&E, and FRC held a meeting in Bethesda, Maryland to discuss the DITER.

On October 31, 1980, RG&E provided Revision 3 [1] to the previous submittals concerning environmental qualification of safety-related electrical equipment.

RG&E supplemented the environmental qualification submittal [1] by a letter dated December 8, 1980 [58] which supplied additional qualification documentation.

On January 3, 1981, RG&E transmitted information concerning installed TMI Action Plan equipment [60].

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The final Technical Evaluation Report (TER) [59] on the qualification status of safety-related electrical equipment subject to harsh environments was issued to the NRC for the R. E. Ginna plant on March 18, 1981. The NRC Safety Evaluation Report (SER) [61], which included the technical conclusions of the TER, was issued to RG&E on June 1, 1981.

RG&E provided a response to the NRC SER by letter dated September 4, 1981 [62].

Requests for Information [76, 77, 78, 79] were transmitted by the NRC to RG&E to obtain TMI Action Plan information, correlations to NUREG-0737 [82], and qualification documentation referenced by RG&E for use in the review of the 90-day response.

RG&E responded to the requests for TMI information [76, 77] by letter dated November 6, 1981 [65] and included some qualification documents referenced in the 90-day response [62].

On February 18, 1982 [66], RG&E transmitted the qualification documentation which was requested in Reference 78.

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2. NRC CRITERIA FOR ENVIRONMENTAL QUALIFICATION

2.1 CRITERIA PROVIDED BY THE NRC

The screening guidelines used to evaluate the electrical equipment environmental qualification program were:

- DOR Guidelines, "Guidelines for Evaluating Environmental Qualification of Class 1E Electrical Equipment in Operating Reactors," November 1979 [54]
- NUREG-0588, Revision 1, "Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment," July 1981 [81].

Other appropriate references used in the review of the licensees' electrical equipment environmental qualification submittals are:

- IE Bulletin 79-01B, "Environmental Qualification of Class 1E Equipment," January 14, 1980; Supplement No. 1, February 29, 1980; Supplement No. 2, September 29, 1980; and Supplement No. 3, October 24, 1980 [94, 95, 55, 56]
- NUREG-0737, "Classification of TMI Action Plan Requirements," November 1980 [82]. This document is applicable for the selection of equipment for the evaluation of the environmental qualification of safety-related electrical equipment located in harsh environments required for TMI Lessons Learned Implementation. The scope of the review is limited to equipment associated with specific sections of NUREG-0727 which have an installation implementation date of January 1, 1981. Where applicable, a review is to be performed on installed equipment with implementation dates after January 1, 1981 if adequately identified by the licensee.

2.2 STAFF POSITIONS AND SUPPLEMENTAL CRITERIA

The NRC identified the following staff positions and supplemental criteria to be used in conjunction with the referenced screening guidelines.

2.2.1 Requirements and Applicable Criteria

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Items 3 and 17 of Supplement 2 to IE Bulletin 79-01B [55] describe the application of the DOR Guidelines and NUREG-0588 to operating reactors (ORs),

near term operating license applicants (NTOLs), and construction permit applicants (CPs). The qualification requirements and applicable criteria are stated as follows:

[Question 3]

"Define the requirements and applicable criteria for ORs, NTOLs, and OLs. Specifically address the NTOLs whose CP SER is prior to July 1974 and after July 1974. Can a CP whose SER is prior to 1974 use the DOR guidelines?"

[NRC Answer to Question 3]

"Table 1 describes the application of each document. All operating reactors as of May 23, 1980, will be evaluated against the DOR guidelines. In cases where the DOR guidelines do not provide sufficient detail, but NUREG-0588 Category II does, NUREG-0588 will be used.

TABLE 1

REQUIREMENTS

| ORs | | CPs | | | |
|--------------------------------|--------------------------|-------------------------|---|--|--|
| DOR GUIDELINES | CP SER Before 7/1/74 | CP SER After 7/1/74 | | | |
| USE NUREG-0588 AS NECESSARY | NURE G-0588 (CAT. II) | NURE G~0588 (CAT. I) | NUREG-0588 (CAT. I) or NEW RULE WHEN IN EFFECT | | |

REPLACEMENT COMPONENTS USE NUREG-0588 (CAT. I)

All plants licensed after May 23, 1980, shall conform to NUREG-0588. In accordance with Regulatory Guide 1.89, all such operating licenses for facilities whose construction permit SER is dated July 1, 1974 or later, are to be reviewed against IEEE Std. 323-1974. Thus, for these licensees, the operating license applicant is to qualify equipment to the Category I column in NUREG-0588. For operating licenses issued after May 23, 1980, whose construction permit SER is dated before July 1, 1974, the operating license applicant is to qualify equipment to at least Category II column of NUREG-0588; unless the licensee made commitment in the construction permit record to use the 1974 standard, or unless the operating licensee application record indicates that the 1974 standard is to be used, in such cases Column I of NUREG-0588 is to be used.

While there are differences between the Category II column of NUREG-0588 and the DOR guidelines, the differences are in details and in the

optional part of the documents. The minimum requirements set forth by these documents are general and compatible. Thus, the minimum standards set by either of the two documents are equally applicable to ORs and NTOLs."

[Question 17]

"Define the requirements for 'replacement parts.' Are they the same for 'spare' parts? Clearly discuss the alternatives for existing inventories of parts/components. If equipment is ordered to meet IEEE Std. 323-1974 standard but lead time exceeds June 1982, can we use IEEE Std. 323-1971 qualified components in the interim?"

[NRC Answer to Question 17]

"The requirements for 'replacement' and 'spare' parts are the same for the purposes of complying with the Commission order and memorandum. After May 1980, all parts used to replace presently installed parts shall be qualified to Category I of NUREG-0588 'unless there are sound reasons to the contrary.' Nonavailability and/or the fact that the part to be used as a replacement is a spare part purchased prior to May 23, 1980, and is in stock are among the factors to be considered in weighing whether there are 'sound reasons to the contrary.' All replacement parts shall as a minimum conform to the requirements described in the answer to question 3. Justification for deviation from Category I of NUREG-0588 shall be documented by the licensee and records shall be available for audit, upon request by the NRC."

2.2.2 Application of Requirements and Criteria to TMI Lessons Learned Implementation Equipment

The NRC requested an evaluation of the environmental qualification of safety-related electrical equipment located in harsh environments required for TMI Lessons Learned Implementation in accordance with criteria established by the NRC in a manner identical to the evaluation of all other safety-related electrical equipment. Additionally, Item 21 of Supplement 2 to IE Bulletin 79-01B [55] states:

"TMI Lessons Learned instrumentation will be considered in the February 1, 1981 SER. This equipment is subject to the same requirements as other safety-related electrical equipment. The guidance and requirements of NUREG-0588 referenced daughter standards, and Reg Guides will be used by the staff in assessing the adequacy of the qualification information."

Item 2 of Supplement 3 to IE Bulletin 79-01B [56] states:

"IEB 79-01B required a 90 day response which was due in mid-April 1980. Supplement 1 (Feb. 1980) informed licensees that equipment which was

'planned' to be installed as a result of lessons learned need not be addressed in that response. Some of this equipment has since been installed. Supplement #2 (Q.5, Q.21) identified that the staff position was that equipment which is installed should be treated in a manner similar to all other safety-related electrical equipment and be addressed in the November 1, 1980 submittal. This position represents no change in staff position regarding the scope of the review. However, since the staff position on this issue was unclear the following will apply:

- Qualification information for installed TMI Action Plan equipment must be submitted by February 1, 1981.
- b. Qualification information for future TMI Action Plan equipment (ref. NURE G-0737, when issued), which requires NRC pre-implementation review, must be submitted with the pre-implementation review data.
- c. Qualification information for TMI Action Plan equipment currently under NRC review should be submitted as soon as possible.
- d. Qualification information for TMI Action Plan equipment not yet installed which does not require pre-implementation review should be submitted to NRC for review by the implementation date."

2.2.3 Equipment Not in the Scope of the Qualification Review

Supplement 2 of IE Bulletin 79-01B [55] permits deferment of the review of environmental qualification for all safety-related equipment items located in plant areas where the equipment is not exposed to the direct effects of a high energy line break (HELB) or to nuclear radiation emanating from circulation of fluids containing radioactive substances. Supplement 3 of IE Bulletin 79-01B [56] permits deferment of the review of environmental qualification for all equipment required to achieve and maintain the plant in a cold shutdown condition. Supplements 2 and 3 of 79-01B originally permitted deferment until after February 1, 1981 of the qualification review of equipment located in a mild environment or required to achieve and maintain the plant in a cold shutdown condition. Since the issuance of Supplements 2 and 3, the NRC has determined that the review of environmental qualification for this equipment is not within the scope of the present review program.

2.2.4 Clarification of Qualification Requirements

2.2.4.1 Service Conditions Inside Containment for a Loss-of-Coolant Accident (DOR Guidelines Section 4.1)

For pressurized water reactors (PWRs), the DOR Guidelines state that the containment temperature and pressure conditions as a function of time should be based on the most recent NRC-approved service conditions specified in the Final Safety Analysis Report (FSAR) or other licensee documentation. In the specific case of pressure-suppression type containments, the following minimum high temperature conditions may be used: (1) boiling water reactor (BWR) drywells -- 340°F for 6 hours and (2) PWR ice condenser lower compartments -- 340°F for 3 hours. As stated in Supplement 2 to IE Bulletin 79-01B [55], "these values are a screening device, per the Guidelines, and can be used in lieu of a plant-specific profile, provided that expected pressure and humidity conditions as a function of time are accounted for."

Service conditions should bound those expected for coolant and steam line breaks inside containment with due consideration given to analytical uncertainties. The steam line break condition should include superheated conditions, the peak temperature, and subsequent temperature/pressure profiles as functions of time. If containment spray is to be used, the impact of the spray on required equipment should be assessed.

The adequacy of a plant-specific profile depends on the assumptions and design considerations at the time the profiles were developed. The DOR Guidelines and NUREG-0588 provide guidance and considerations required to determine if the calculated plant-specific temperature/pressure profiles encompass the loss-of-coolant accident (LOCA) and HELB accidents inside containment.

2.2.4.2 Submergence (DOR Guidelines Section 4.1, Subitem 3; and Section 4.3.2, Subitem 3)

. . :

> Equipment submergence (inside or outside containment) should be addressed where the possibility exists that submergence of equipment may result from HELBs or other postulated occurrences. Supplement 2 to IE Bulletin 79-01B [55] provides the following additional criterion: If the equipment satisfies the

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guidance and other requirements of the DOR Guidelines or NUREG-0588 for the LOCA and HELB accidents, and the licensee demonstrates that its failure will not adversely affect any safety-related function or mislead the operator after submergence, the equipment can be considered exempt from the submergence portion of the qualification requirements.

2.2.4.3 Simulated Service Conditions and Test Duration (DOR Guidelines Section 5.2.1)

The Guidelines require that the test chamber environment envelop the required service conditions for a time equal to the period from the initiation of the accident until the service conditions return to normal. Supplement 2 to IE Bulletin 79-01B [55] provides the following additional criterion:

"Equipment designed to perform its safety-related function within a short time into an event must be qualified for a period of at least 1 hour in excess of the time assumed in the accident analysis. The staff has indicated that time is the most significant factor in terms of the margins required to provide an acceptable confidence level that a safety-related function will be completed. The 1-hour qualification requirement is based on the acceptance of a type test for a single unit and the spectrum of accidents (small and large breaks) bounded by the single test."

2.2.4.4 Test Sequence (DOR Guidelines Section 5.2.)

Supplement 2 to IE Bulletin 79-01B [55] provides the following additional criteria:

"Sequential testing requirements are specified in NUREG-0588 and the DOR Guidelines. Licensees must follow the test requirements of the applicable document.

- If the test has been completed without aging in sequence, justification for such a deviation must be submitted.
- If testing of a given component has been scheduled but not initiated, the test sequence/program should be modified to include aging.
- 3. Test programs in progress should be evaluated regarding the ability to comply by incorporating aging in the proper sequence. These programs would then fall in the first or second category."

2.2.4.5 Radiation

(DOR Guidelines Sections 4.1.2, 4.2.2, and 4.3.2, Subitem 2)

Supplement 2 to IE Bulletin 79-01B [55] provides the following additional criteria:

"Both the DOR Guidelines and NUREG-0588 are similar in that they provide the methods for determining the radiation source term when considering LOCA events inside containment (100% noble gases/50% iodine/1% particulates). These methods consider the radiation source term resulting from an event which completely depressurizes the primary system and releases the source term inventory to the containment.

NUREG-0578 provides the radiation source term to be used for determining the qualification doses for equipment in close proximity to recirculating fluid systems inside and outside of containment as a result of LOCA. This method considers a LOCA event in which the primary system may not depressurize and the source term inventory remains in the coolant.

NUREG-0588 also provides the radiation source term to be used for qualifying equipment following non-LOCA events both inside and outside containment (10% noble gases/10% iodine/0% particulates).

When developing radiation source terms for equipment qualification, the licensee must ensure consideration is given to those events which provide the most bounding conditions. The following table summarizes these considerations:

| | LOCA | Non-LOCA HELB |
|---------------------|--|-----------------------------------|
| Outside Containment | NUREG-0578 (100/50/1 in RCS) [*] | NUREG-0588 (10/10/0 in RCS) |
| Inside Containment | Larger of | |
| | NUREG-0588 (100/50/1 in containment) | NUREG-0588 (10/10/0 in RCS) |
| | or | |
| | NUREG-0578 (100/50/1 in RCS) | |
| | | |

*The numbers in parentheses represent % noble gases/% iodine/% particulates. RCS means reactor coolant system. Gamma equivalents may be used when consideration of the contibutions of beta exposure has been included in accordance with the guidance given in the DOR Guidelines and NUREG-0588. Cobalt 60 is one acceptable gamma radiation source for environmental qualification of safety-related equipment. Cesium 137 may also be used."

2.2.5 Additional Clarification of Qualification Requirements

The NRC has worked with a number of licensees, at their requests, to provide further clarification on environmental qualification requirements. On January 20, 1982, the NRC issued Generic Letter No. 82-09 [96] presenting staff positions on certain aspects of the qualification requirements. Generic Letter No. 82-09 states:

"1. Operator Display Instrumentation

- Q. Given the interrelated activities associated with display instrumentation (e.g., NUREG-0700, NUREG-0799, proposed Regulatory Guide 1.97 and Equipment Qualification efforts), what display instrumentation referenced in emergency operating procedures must be identified in licensee submittal to the NRC?
- A. All display instrumentation referenced in the emergency procedures need not be identified. The NRC requires that licensees need only identify and have available qualification documentation on those operator display instruments which are safety-related (see Question 2). If incensees have previously supplied a listing of all display instrumentation referenced in emergency procedures, licensees may identify (such as by the use of an *) which of those instruments are safety-related. The staff will defer review of the basis for this safety-related classification until other NRC activities¹ have been implemented. When these other activities are implemented, additional instruments presently not requiring qualification may require upgrading to a safety-related status and/or may require qualification. Licensees will be required at that time to qualify this instrumentation in accordance with the following criteria:
 - For new or upgraded instrumentation with a required operation date prior to the equipment qualification deadline, qualification must be accomplished by the equipment qualification deadline.

¹Such activities include preparation of new emergency procedures (NUREG-0799), control room design reviews (NUREG-0700), and upgrading of accident monitoring instrumentation (Reg. Guide 1.97 and NUREG-0737). For new or upgraded instrumentation with a required operation date after the equipment qualification deadline, qualification must be accomplished prior to equipment operation and plant acceptance.

2. Safety-Related Equipment

- Q. For Equipment Qualification purposes, what constitutes <u>all</u> safety-related electrical equipment?
- A. The Commission, in CLI-80-21, required the environmental qualification of only safety-related electrical equipment. Identification of the safety-related equipment installed at specific plants can be obtained from FSARs, Technical Specifications and other docketed correspondence setting forth NRC requirements or licensee commitments. Identification of safety-related equipment installed in harsh environments at specific plants must be supplied by the licensee. The necessity for upgrading nonsafety-related system to safety-related status will be the subject of other NRC reviews.

3. Replacement Parts

- Q. Please clarify the NRC requirements on replacement parts.
- A. In CLI-80-21, the Commission stated that unless there were sound reasons to the contrary, replacement equipment should be qualified to the standards set forth in Category I of NUREG-0588. The Commission's position was designed to promote the policy of upgrading the environmental qualification and reliability of installed safety-related electrical equipment. To meet this overall goal, licensees must institute internal policy practices consistent with the Commission's statement.

Situations may arise in which upgrading to NUREG-0588, Category I of replacement equipment qualified to NUREG-0588, Category II or the DOR Guidelines will not be compatible with overall station safety and performance goals. Licensees must review such situations on a case-by-case basis and determine that 'sound reasons to the contrary' do, in fact, exist which warrant the use of replacement equipment (not necessarily in-kind) qualified to the DOR Guidelines or NUREG-0588, Category II. For equipment located in a harsh environment, licensees' procedures must provide for documentation and substantiation of such determinations.

Conditions which reflect sound reasons why qualification standards for replacement of equipment in a harsh environment need not be upgraded to NUREG-0588, Category I include the following:

- The licensee has replacement equipment in stock that meets the DOR Guidelines or NUREG-0588, Category II, and procurement actions regarding such replacement equipment had commenced prior to May 23, 1980.
- Replacement equipment qualified to the NUREG-0588, Category I standards does not exist.
- 3. Replacement equipment qualified to the NUREG-0588, Category I standards is not available to meet installation and operation schedules. Equipment qualified to the DOR Guidelines or NUREG-0588, Category II may be used for an interim period until Category I equipment is obtained and an outage of sufficient duration is available for replacement. Justification for use of the non-Category I qualified replacement equipment beyond this interim period must be submitted to the NRC for approval prior to the end of the interim period and in sufficient time for reasonable NRC review.
- Replacement equipment qualified to NUREG-0588, Category I standards would require significant plant modifications to accommodate its use.
- 5. Operating performance and reliability data for the Category I equipment indicates poor overall equipment performance. For example, mean time to failure is significantly shorter for the Category I replacement equipment.
- 6. The use of replacement equipment qualified to NUREG-0588, Category I standards has a significant probability of creating human factor problems that will negatively affect plant safety and performance, e.g., (1) knowledge, skills and ability of existing plant staff require significant upgrading to operate or maintain the specific Category I replacement equipment; (2) the use of equipment qualified to Category I standards creates a one-cf-a-kind application; or (3) maintenance, surveillance or calibration activities are unnecessarily complex.

5. Submergence Outside Containment

Q. For equipment qualification purposes, what are the staff requirements concerning submergence of equipment outside containment?

A. The Staff requires that the licensee submit documentation on the qualification of safety-related equipment that could be submerged due to a high energy line break outside containment.

6. Radiation

- Q. Is the staff screening value of 4 x 10⁷ rads applicable to all operating reactors?
- A. No. This screening value is applicable only to PWRs with dry type containments. However, for PWRs with dry type containments, the licensee may choose to use plant specific analysis instead of the screening value. For plants with other containment types, the licensee must use plant specific analysis.

Acceptable to the Staff for equipment qualification purposes are radiation values developed as part of the plant licensing process provided that they are based on the TID14844 source terms and are conservatively performed. In order to assure that the methodologies are appropriate, the Staff requests two component specific sample calculations (one for inside and one for outside containment), and a brief written description of each of the methodologies used, their application and associated conservatisms. Such sample calculations and a statement by the licensee that the values of radiation exposure of components so derived are appropriate for environmental qualification of equipment will satisfy the Staff's concern on the 'Radiation Specification Value' used during the qualification reviews.

7. Containment Service Conditions

- Q. Must the Staff value (identified in the SERs) of T_{SAT} for PWRs and T_{SAT} + 20°F for BWRs be used as the maximum in-containment temperature for the purpose of equipment qualification?
- A. No. The Staff will accept the use of these values. However, an acceptable alternative to the NRC staff's temperature criterion used for the service conditions must base that service condition on the FSAR analysis or other NRC approved analysis, provided that the specific analysis, or a summary of that analysis, together with reference to the previous NKC acceptance of the analysis is submitted by the licensee. In addition, some of the information in the associated safety evaluation may require clarification.

8. One Hour Minimum Operating Time

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Q. The Staff has previously indicated that certain exceptions to the one hour minimum operating time rule are permitted. Can further clarification be provided?

A. With regard to plants subject to the qualification requirements of the DOR Guidelines or Category II of NUREG~0588, for those pieces of equipment tested prior to May 23, 1980, the test data and analysis may be used to qualify the equipment to the required operating time plus an appropriate margin. The one hour margin requirement need not be applied. However, subsequent failures should be shown not to be detrimental to plant safety.

The one hour time margin rule is not applicable to equipment whose safety function is performed prior to significant changes in the environment at the equipment location.

9. Aging

- Q. Must a qualified life be developed for all safety-related electrical equipment located in harsh environments?
- A. Section 7 of the DOR Guidelines and Section 4.2, Category II of NUREG-0588, do not require a qualified life to be established for all safety-related electrical equipment located in harsh environments. A qualified life, in accordance with the provisions in IEEE 323-1974, is required for equipment, including replacement parts, qualified to Category I of NUREG-0588 that is located in a harsh environment.

An acceptable method for addressing in-service degradation is through a preventive maintenance/surveillance program with equipment and component refurbishment and/or replacement based on known susceptibility to aging degradation, the results of inspections, or manufacturers recommendations. These elements of the program lead to an understanding on a device specific basis of the nature and extent of the increased stress levels encountered during Design Basis Accidents and resultant degradation (if any) which may occur. Arrhenius or other appropriate accelerated aging methodologies may be used to establish replacement and refurbishment schedules if the component's design and materials application are sufficiently simple and the necessary data are available to allow a meaningful application.

In plants subject to the qualification requirements of either the DOR Guidelines or NUREG-0588 Category II, for equipment that has been identified as being susceptible to significant degradation due to thermal and radiation aging, the schedule for inspection of and/or replacement of the susceptible components in that equipment must be incorporated into the preventive maintenance and surveillance programs, and that information should be incorporated into the system component evaluation worksheets (SCEWS). For other equipment, the aging column in the SCEWS should be marked 'No Known Susceptibility'."

3. METHODOLOGY USED FOR THE EVALUATION

3.1 INTRODUCTION

As discussed in Section 1.3 of this report, the NRC issued Safety Evaluation Reports (SERs) on environmental qualification of safety-related equipment to licensees of all operating plants in mid-1981.

The SERs identified various equipment qualification deficiencies as indicated below:

LEGEND: DESIGNATION FOR DEFICIENCY

| R | - R. | adiation | M | * | Margin |
|-----|------|------------------------------|-----|---|--------------------------------------|
| Т | - T | emperature | I | - | HELB Evaluation Outside |
| QT | - Q1 | ualification Time | | | Containment Not Completed |
| RT | - R | equired Time | QM | - | Qualification Method |
| P | - P | ressure | RPN | - | Equipment Relocation or Replacement, |
| Н | - Hu | umidity | | | Adequate Schedule Not Provided |
| CS | - C1 | hemical Spray | EXN | - | Exempted Equipment Justification |
| A | - Ma | aterial Aging Evaluation, | | | Inadequate |
| | R | eplacement Schedule, Ongoing | SEN | ÷ | Separate Effects Qualification |
| | E | quipment Surveillance | | | Justification Inadequate |
| S | - St | ubmergence | QI | - | Qualification Information Being |
| (R) | - L | icensee has committed | | | Developed |
| | t | o replace equipment | RPS | - | Equipment Relocation or Replacement |
| | | | | | Schedule Provided |

The SERs directed licensees to "either provide documentation of the missing qualification information which demonstrates that safety-related equipment meets the DOR Guidelines or NUREG-0588 requirements or commit to a corrective action (re-qualification, replacement [etc.]) to establish qualification by June 30, 1982." Licensees were required to respond to the NRC within 90 days of receipt of the SER.

As stated in Section 1.1, the purpose of this report is (1) to evaluate licensees' resolutions of outstanding issues related to safety-related electrical equipment environmental qualification (EEQ) discussed in the NRC's SERs in accordance with NRC criteria, and (2) to evaluate licensees' qualification documentation of safety-related electrical equipment, including

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TMI Lessons Learned Implementation equipment, located in harsh environments in accordance with criteria established by the NRC (see Section 2 of this report). The methodology used to evaluate (1) the Licensee's response to the NRC SER and (2) the equipment environmental qualification is presented herein.

3.2 METHODOLOGY

The Licensee, Rochester Gas and Electric Corporation, provided a response to the SER and additional qualification information in its submittals [62, 65, 66] to the NEC for the R. E. Ginna Nuclear Power Plant.

The following bases provided by the NRC were used to determine the relative completeness of the Licensee's submittals:

- Determine whether the Licensee provided specific responses to the SER concerns.
- Determine whether the Licensee proposed corrective actions and a schedule for completion of the actions.
- Determine whether the Licensee addressed the NRC's concern for margin with respect to the containment environmental conditions.
- o Determine whether the Licensee revised the environmental parameters.
- Determine whether the Licensee's System Component Evaluation Work Sheets (SCEWS) were updated to correct deficiencies and add supplemental information.
- Determine whether the Licensee provided justifications for interim operation for all unqualified equipment.
- o Determine whether the Licensee addressed aging and incorporated the results into the equipment maintenance program.

The extensive list of safety-related electrical equipment* in various locations of the plant identified by the Licensee was analyzed, and all identical equipment located within plant areas that are exposed to the same environmental service conditions was grouped together and designated an

^{*}In this report, the term "safety-related electrical equipment" refers to the equipment defined by the two NRC Guidelines referenced in Section 2.1.

"equipment item." In this report, the term "equipment item" refers to a specific type of electrical equipment, designated by manufacturer and model, which is representative of all identical equipment in a plant area exposed to the same environmental service conditions (e.g., Flow Transmitter, Fischer & Porter, Model 10B2496, located within containment). This analysis resulted in a reduced listing of equipment (equipment items) that formed the basis for the review.

Appendix A contains the environmental service conditions for each location. Appendix B contains the tabulation of the equipment items, locations, function, plant identification numbers, required operating time, and applicable qualification documentation references. Appendix C lists the plant systems identified by the Licensee and the NRC as being essential to safety.

Each item in the list of safety-related electrical equipment items was reviewed in relation to:

- o the Licensee's response to the SER concerns
- technical information received from the Licensee as a result of requests for additional information (Appendix E)
- o technical data derived from the Licensee's submittal
- o NRC DOR Guidelines or NUREG-0588 Revision 1 criteria
- o the Licensee's definition of harsh service environments (Appendix A)
- o docume thation cited by the Licensee as evidence of qualification
- applicable and available qualification documentation associated with the overall equipment environmental qualification program
- o the Licensee's analysis and/or justification of qualification
- o Licensee-proposed corrective action for qualification deficiencies
- o the Licensee's equipment/part replacement schedules
- o the Licensee's technical arguments concerning the adequacy of equipment, based on system operational considerations
- the Licensee's rationale concerning exemption of equipment from qualification.

Topics not within the scope of the evaluation are:

o completeness of the Licensee's listing of safety-related equipment

o acceptability of Licensee-provided environmental service conditions.

The NRC requested an evaluation of the environmental qualification of safety-related electrical equipment located in harsh environments required for TMI Lessons Learned Implementation. The objective is to evaluate qualification documentation of equipment within the scope of IE Bulletin 79-01B, Supplement 3 (item 2), in accordance with criteria established by the NRC (see Section 2 of this report) in a manner identical to the evaluation of all other safetyrelated electrical equipment. The scope of this review is limited to TMI Action Plan equipment associated with those sections of NUREG-0737 which have an equipment installation implementation date of January 1, 1982 (sections are identified below). Where applicable, a review was to be performed on installed equipment with implementation dates after January 1, 1981 if adequately identified by the licensee.

II.B.3 (ALL/1-1-81) Post-Accident Sampling Capability of Reactor Coolant and Containment

II.D.3 (ALL/1-1-81) Direct Indication of Relief and Safety Valve Position

II.E.1.2 (PWR/1-1-81) Auxiliary Feedwater System Automatic Initiation and Flow Indication

II.E.3.1 (PWR/1-1-81) Emergency Power Supply for Pressurizer Heaters
(Safety-Grade Interfaces)

II.E.4.1 (ALL/7-1/81) Dedicated Hydrogen Penetrations

II.E.4.2 (ALL/1-1-81) Containment Isolation Dependability

II.F.2 (PWR/1-1-81) Instrumentation for Detection of Inadequate Core Cooling

II.G.1 (PWR/1-1-81) Emergency Power for Pressurizer Equipment (Safety-Grade Interfaces)

II.K.2.10 (PWR/B&W/7-1-81) Safety-Grade Anticipatory Reactor Trip

II.K.3.9 (PWR/W/1-1-81) PID Controller Modification (If Hardware Change Involved)

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II.K.3.12 (PWR/W/1-1-81) Anticipatory Reactor Trip upon Turbine Trip II.K.3.13 (PWR/GE/7-1-81) Separation of HPCI and RC1C Initiation Signals II.K.3.15 (BWR/GE/7-1-81) Prevention of Spurious Isolation of HPCI and RCIC Systems

II.K.3.19 (BWR/GE/7-1-81) Interlock on Recirculation Pump Loop

II.K.3.21 (BWR/GE/7-1-18) Restart of Core Spray and LPCI Systems (If Hardware Changed Out)

II.K.3.27 (BWR/GE/7-1-81) Provide Common Reference Level for Vessel Level Instrumentation (If Hardware Changed Out)

Licensees whose plants were included within the NRC Systematic Evaluation Program received a Technical Evaluation Report (TER) in addition to the SER. The TER was based on a review of equipment environmental qualification documentation associated with the Licensee's EEQ submittals. The qualification deficiencies identified in the SER were derived from the TER. Plants included within this program were the Palisades, Oyster Creek, Ginna Haddam Neck, Yankee Rowe, LaCrosse, and Big Rock Point plants and Zion Station Units 1 and 2, Indian Point Units 2 and 3, Millstone Unit 1, Dresden Unit 2, and San Onofre Unit 1. For these plants, the evaluation presented herein is based on (1) the result of the initial TER, (2) the Licensee's response to the NRC SER and the TER, and (3) the Licensee's updated EEQ submittal(s).

TERs were also developed for the following plants: Nine Mile Point Unit 1, Millstone Unit 2, Salem Unit 1, Browns Ferry Units 1, 2, and 3, Brunswick Units 1 and 2, Hatch Units 1 and 2, Dresden Unit 3, and Quad Cities Unics 1 and 2. The objective of those TERs was to review the Licensee's submittals to determine if safety-related electrical equipment was reviewed for environmental qualification by the Licensee in accordance with the DOR Guidelines and NUREG-0588 as required by IE Bulletin 79-01B. For these 13 plants and all other plants, excluding the 14 plants associated with the Systematic Evaluation Program, the evaluation presented herein is based solely on (1) the Licensee's response to the NRC SER and (2) the Licensee's revised EEQ submittal(s).

This technical evaluation was conducted to identify (1) whether the Licensee provided an adequate response to the SER concerns (and TER concerns,

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where applicable), (2) major deficiencies within the equipment qualification program, and (3) whether the Licensee proposed adequate corrective actions to resolve qualification deficiencies and provided a schedule for completion of the corrective actions. The TER was written primarily to address deviations from the NRC criteria and requirements. Technical data or test results that satisfy the qualification criteria are not discussed herein.

The evaluation presented in Section 4 of this report includes completed equipment environmental qualification review checksheets (partially handwritten) which compile both the technical information necessary to conduct the review and the results of the evaluation. Parameters listed on these checksheets were derived from the appropriate NRC screening criteria. The evaluation of each equipment item includes several checksheet pages. Only those checksheet pages necessary to complete the evaluation for each equipment item are included in this report. A complete listing of the checksheet pages is shown on the bottom of Checksheet la, reproduced here as Figure 3-1.

The checksheets contain the following information:

o Equipment item information (see Figure 3-1), for example:

Solenoid Val & Located in Turbine Building (Area #7) Automatic Switch Co. (ASCO) Model LB8300B61U Actuates Feedwater Control Valves (V-4269, V-4270) Licensee Reference 839 Required Operating Time: Short term (SI signal) TER Checksheet No. 1 Reference 59, Section 4.5.2.6 Licensee Submirtal: Page 9 [62]; Table 3, Page 1 [1]; SCEW 1

- o Qualification deficiencies identified in the SER (see Figure 3-1)
- o Licensee's response to the SER
- o Licensee's statements and rationale for qualification
- o Licensee's corrective action and replacement schedule

del

- Evaluation of qualification including identification of all deficiencies
- Evaluation of system considerations presented by the Licensee as a rationale for excluding equipment from qualification.

The results of the evaluation are summarized on Checksheet 2 (Equipment Environmental Qualification Summary Form) for each equipment item. Checksheet

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|--|--|-----------------------------------|
| QUIPMENT ENVIRONMENTAL QUALIFIC | CATION REVIEW OF EQUIPMENT IT | EM NO |
| Equipment Item No. 1 Solenoid Valves Located in Turbine Bu Automatic Switch Co. (ASCO) Model LB8 Actuates Feedwater Control Valves (V- Licensee Reference 1617 Required Operating Time: Short term TER Checksheet No. 1 Reference 59, Section 4.5.2.6 Licensee Submittal: Page 9 [62]; Tab | Milding (Area #7) 0300861U -4269, V-4270) (SI signal) Dle 3, Page 1 [1]; FRC SCEW 1 | |
| | | |
| | | |
| | | |
| | | |
| | | |
| DESIGNATION FOR DEFICIENCY IDENTIFIED | D BY THE NRC SER - CIRCLED ITEM (| S) ONLY: |
| (See Section 3 of this TER for Legend | 4) | |
| | . I. UM, RPN, EXN, SEN, QI, RPS, | |
| R, T, Q1, RT, P, H, CS, A, S, (R), M | | None, |
| R, T, QT, RT, P, H, CS, A, S, (R), M, Not stated, Not applicable | | None, |
| R, T, QT, RT, P, H, CS, A, S, (R), M, Not stated, Not applicable LISTING OF APPLICABLE CHECKSHEETS: | | None, |
| R, T, QT, RT, P, H, CS, A, S, (R), M, Not stated, Not applicable LISTING OF APPLICABLE CHECKSHEETS: Contents | Checksheet Pag | None, |
| R, T, QT, RT, P, H, CS, A, S, (R), M, Not stated, Not applicable LISTING OF APPLICABLE CHECKSHEETS: Contents Equipment Item | Checksheet Pag | None, |
| R, T, QT, RT, P, H, CS, A, S, (R), M, Not stated, Not applicable <u>LISTING OF APPLICABLE CHECKSHEETS</u> : <u>Contents</u> Equipment Item Summary of Licensee Responses to the | Checksheet Pag la NRC SER 1b | None, e No. |
| R, T, QT, RT, P, H, CS, A, S, (R), M, Not stated, Not applicable <u>LISTING OF APPLICABLE CHECKSHEETS</u> : <u>Contents</u> Equipment Item Summary of Licensee Responses to the Equipment Environmental Qualification | Checksheet Pag la NRC SER lb n Summary Forms 2 | None, a No. |
| R, T, QT, RT, P, H, CS, A, S, (R), M, Not stated, Not applicable <u>LISTING OF APPLICABLE CHECKSHEETS</u> : <u>Contents</u> Equipment Item Summary of Licensee Responses to the Equipment Environmental Qualification Licensee Response to NRC SER | Checksheet Pag la NRC SER lb n Summary Forms 2 3a, 3b, 3c, 3d | None, |
| R, T, QT, RT, P, H, CS, A, S, (R), M, Not stated, Not applicable <u>LISTING OF APPLICABLE CHECKSHEETS</u> : <u>Contents</u> Equipment Item Summary of Licensee Responses to the Equipment Environmental Qualification Licensee Response to NRC SER System Consideration Review | Checksheet Pag la NRC SER lb n Summary Forms 2 3a, 3b, 3c, 3d 4a, 4b, 4c, 4d | None, <u>e No.</u> , 4e, 4f |

Figure 3-1. Sample Checksheet Page la

Maintenance and Replacement Schedule Summary

"Equipment Item"

7a, 7b, 7c

2 specifically identifies any qualification deficiencies determined by the evaluation and identifies the NRC qualification category to which the equipment item was assigned. A sample Checksheet 2 is presented in Figure 3-2.

All information was reviewed for conformance to the NRC criteria referenced in Section 2 of this report. As requested by the NRC, all applicable and available qualification documentation associated with the overall Equipment Environmental Qualification (EEQ) program was used by the reviewers, whether referenced by the Licensee or not.

Upon completion of the review for each equipment item, an overall evaluation of the component and a specific conclusion with respect to its qualification was developed. Based on the evaluation, each equipment item was assigned to one of the generic qualification categories provided by the NRC. The NRC category descriptions are presented in Section 3.3 of this report.

3.3 NRC QUALIFICATION CATEGORIES AND DEFINITIONS

o NRC Category I.a

EQUIPMENT THAT SATISFIES ALL APPLICABLE REQUIREMENTS OF THE DOR GUIDELINES OR NUREG-0588, OR HAS ACCEPTABLE DEVIATIONS FROM THE DOR/NUREG CRITERIA

This category includes equipment items which are fully acceptable on the basis that all applicable criteria defined in the DOR Guidelines or NUREG-0588 are (1) satisfied and the equipment has been found to be qualified or (2) sufficient information has been presented to determine that deviations from the criteria are acceptable or insignificant.

o NRC Category I.b

EQUIPMENT FOR WHICH DEVIATIONS FROM THE DOR GUIDELINES OR NUREG-0588 ARE JUDGED CONDITIONALLY ACCEPTABLE PROVIDED THAT SPECIFIC MODIFICATIONS ARE MADE

This category includes equipment items that do not satisfy one or more of the applicable criteria defined in the DOR Guidelines or NUREG-0588; however, the Licensee has stated that specific modifications will be made on or before a designated date. This equipment is considered by NRC to be conditionally acceptable provided that the specific modifications are made by the Licensee. When the modifications are completed as proposed, the Licensee states that the equipment will satisfy all applicable NRC requirements. Examples of specific modifications are (1) replacement of unqualified equipment with qualified equipment, (2) equipment hardware

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Figure 3-2. Sample Checksheet Page 2

"Equipment Environmental Qualification Summary Form"

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modification, (3) equipment relocation above submergence level, (4) relocation or shielding of equipment from radiation source, (5) verificatica of qualification by additional testing, (6) equipment relocation to a mild environment, and (7) qualification testing of equipment in progress.

o NRC Category II.a

EQUIPMENT FOR WHICH QUALIFICATION DOCUMENTATION IS INSUFFICIENT TO ESTABLISH THAT THE EQUIPMENT IS OR IS NOT QUALIFIED IN ACCORDANCE WITH THE DOR GUIDELINES OR NUREG-0588

The qualification of equipment items in this category, in accordance with the requirements of the DOR Guidelines or NUREG-0588, is significantly deficient or inconclusive based upon review of (1) the documentation provided by the Licensee or (2) applicable and available qualification documentation associated with the overall equipment environmental qualification program. The qualification documentation indicates significant deficiencies, which can be categorized as follows: (1) appropriate documentation reflecting qualification has not been cited and made available for review by the Licensee and there is no knowledge of applicable documentation; (2) the Licensee is awaiting qualification from the equipment vendor; or (3) the qualification documentation indicates significant deficiencies; however, where testing was conducted, no reported failures or severe anomalies were observed which would unquestionably affect the ability of the equipment to perform its design basis safety function(s).

NRC Category II.b EQUIPMENT THAT IS UNQUALIFIED

This category includes equipment items whose qualification documentation has been judged to be seriously deficient based upon review of (1) the documentation provided by the Licensee, or (2) applicable and available qualification documentation associated with the overall equipment environmental qualification program. The qualification documentation indicates serious deficiencies reported during testing; for example, severe anomalies or failure of the test specimen, which could affect the ability of the equipment to perform its safety function. NRC has requested immediate written notification when an equipment item is placed in this category during the course of the review.

o NRC Category II.c

EQUIPMENT THAT SATISFIES ALL APPLICABLE REQUIREMENTS OF THE DOR GUIDELINES OR NUREG-0588 WITH THE EXCEPTION OF QUALIFIED LIFE

This category includes equipment items that are acceptable on the basis that all applicable criteria defined in the DOR Guidelines or NUREG-0588 are satisfied with the exception of the qualified life criterion. The Licensee (1) has not evaluated qualified life or replacement schedule. (2) has not adequately evaluated qualified life or replacement schedule, or (3) has not adequately intepreted qualified life in terms of calendar time. [Note: The component replacement schedule discussed in Section 7.0 of the

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DOR Guidelines is, in effect, a qualified life. It is not essential to use the term "qualified life," but the replacement schedule must be justified.]

NRC Category III.a EQUIPMENT THAT IS EXEMPT FROM QUALIFICATION

This category includes equipment items that are exempt from qualification on the basis that (1) the equipment does not provide a safety function (i.e., should not have been included in the equipment list submitted by the Licensee), or (2) the specific safety-related function of the equipment can be accomplished by some other designated equipment that is fully qualified and satisfies the single failure criterion. In addition, any failure of the exempt equipment must not mislead the operator or degrade the ability of qualified equipment to perform its required safety-related function.

NRC Category III.b EQUIPMENT NOT IN THE SCOPE OF THE QUALIFICATION REVIEW

This category includes equipment items addressed by the Licensee in the equipment environmental qualification submittals which are (1) required to achieve and maintain the plant in a cold shutdown condition or (2) located in a mild environment. Supplement 2 of IE Bulletin 79-01B permits deferment of the review of environmental qualification for all safetyrelated equipment items located in plant areas where the equipment is not exposed to the direct effects of a high energy line break (HELB) or to nuclear radiation emanating from circulation of fluids containing radioactive substances. Supplement 3 of IE Bulletin 79-01B permits deferment of the review of environmental qualification for all equipment required to achieve and maintain the plant in a cold shutdown condition. Supplements 2 and 3 of IE Bulletin 79-01B originally permitted deferment until after February 1, 1981 of the qualification review of equipment located in a mild environment or required to achieve and maintain the plant in a cold shutdown condition. Since the issuance of Supplements 2 and 3, the NRC has determined that the review of environmental qualification for this equipment is not within the scope of this report.

o NRC Category IV

EQUIPMENT FOR WHICH QUALIFICATION DOCUMENTATION HAS NOT BEEN MADE AVAILABLE FOR REVIEW

This category includes equipment items for which qualification documentation in accordance with the requirements of the DOR Guidelines or NUREG-0588 has been cited by the Licensee as evidence of qualification; however, this documentation has not been made available for review. Therefore, a conclusion cannot be reached with respect to qualification of this equipment.

3.4 IMPLEMENTATION GUIDE FOR FULFILLING NRC CRITERIA

The NRC has requested that a detailed implementation guide for fulfilling NRC criteria be prepared as part of this assignment. The implementation guide will present a fully detailed discussion of the principal qualification criteria presented in the DOR Guidelines and NUREG-0588. The primary emphasis will be to clarify technical points, eliminate possible misconceptions, and clearly provide definitive guidance to enable licensees to understand and resolve, in an expeditious manner, qualification deficiencies identified as a result of this TER. The implementation guide (TER-C5257-532) has been prepared and issued to the NRC. The implementation guide is either appended to this TER or will be forwarded to the Licensee by the NRC under a separate letter. The Licensee is encouraged to review that document.



4. TECHNICAL EVALUATION

4.1 INTRODUCTION

The technical evaluation presented in this section represents the equipment environmental qualification (EEQ) assessment for each equipment item listed in Appendix B in accordance with the methodology presented in Section 3 of this report. The evaluations were conducted to identify any major deficiencies within the Licensee's equipment qualification program and to determine whether the Licensee (1) provided an adequate response to the SER concerns, (2) proposed adequate corrective actions to resolve qualification deficiencies, and (3) provided a schedule for completion of the corrective actions.

The evaluations are based on the available qualification documentation provided by the Licensee, complemented in several cases by other relevant technical information. The major qualification deficiencies that have been identified and the results of the evaluation are shown in the Equipment Environmental Qualification Summary Forms (Tables 4-1, 4-2, 4-3, and 4-4) presented in Section 4.1.

Observations concerning the Licensee's qualification methodology presented in response to the NRC SER are presented in Section 4.3.

Technical evaluations of the environmental qualification of the equipment items are presented in Section 4.4.

4.2 SUMMARY OF THE EVALUATION

The following tabulations represent a summary of the results of the equipment environmental qualification evaluation conducted in accordance with the methodology presented in Section 3.

Table 4-1 summarizes the number of equipment items assigned to each NRC qualification category as a result of the evaluation.

Table 4-2 summarizes the number of equipment items found to have a specific qualification deficiency.

Table 4-3 summarizes the number of equipment items for which the Licensee has proposed a specific corrective action to resolve a qualification deficiency.

Table 4-4 consists of Equipment Environmental Qualification Summary Forms for the equipment items, identifying (1) compliance with the qualification requirements defined in Section 2, (2) the resultant NRC qualification category, and (3) the Licensee-proposed corrective action.

TABLE 4-1

NUMBER OF EQUIPMENT ITEMS IN EACH QUALIFICATION CATEGORY

| NRC | CATEGORY Description | NUMBER OF EQUIPMENT ITEMS |
|-------|---|---------------------------------|
| | | |
| I.A | EQUIPMENT QUALIFIED [EQUIPMENT ITEM NO(S).: 31, 32, 36, 61] | 4 |
| I.8 | EQUIPMENT QUALIFICATION PENDING MODIFICATION | 16 |
| II.A | EQUIPMENT QUALIFICATION NOT ESTABLISHED [EQUIPMENT ITEM NO(S).: 10, 29, 30, 34, 35, 38, 39, 40, 43, 50, 55, 56, 57, 62, 64, 66] | 16 |
| II.B | EQUIPMENT NOT QUALIFIED | - 0 |
| II.C | EQUIPMENT SATISFIES ALL REQUIREMENTS EXCEPT QUALIFIED LIFE OR REPLACEMENT SCHEDULE JUSTIFIED | - 7 |
| III.A | EQUIPMENT EXEMPT FROM QUALIFICATION- [EQUIPMENT ITEM NO(S).: 12, 15, 17, 24] | 4 |
| III.B | EQUIPMENT NOT IN THE SCOPE OF THE REVIEW | 20 |
| IV | DOCUMENTATION NOT MADE AVAILABLE | •• 0 |
| | TOTAL | 67 |

TABLE 4-2

QUALIFICATION DEFICIENCY SUMMARY

| DOCUMENTED EVIDENCE OF QUALIFICATION ADEQUATE [EQUIPMENT ITEM NO(S).: 1, 2, 4, 5, 6, 8, 9, 29, 30, 43, 49, 50, 56, 57, 62, 63, 67] ADEQUATE SIMILARITY BETWEEN EQUIPMENT AND TEST SPECIMEN ESTABLISHED (EQUIPMENT ITEM NO(S).: 1, 2, 4, 5, 6, 10, 29, 30, 34, 35, 46, 55, 64, 66, 67] AGING DEGRADATION EVALUATED ADEQUATELY (EQUIPMENT ITEM NO(S).: 1, 2, 4, 5, 6, 8, 9, 33, 41, 45, 46, 47, 48, 50, 67] QUALIFIED LIFE OR REPLACEMENT SCHEDULE ESTABLISHED (IF REQUIRED) (EQUIPMENT ITEM NO(S).: 1, 2, 4, 5, 6, 8, 9, 13, 14, 16, 18, 27, 29, 30, 33, 37, 38, 39, 40, 41, 45, 46, 47, 48, 50, 55, 67] PROGRAM ESTABLISHED TO IDENTIFY AGING DEGRADATION (EQUIPMENT ITEM NO(S).: 1, 2, 4, 5, 6, 41, 45, 47, 48, 50, 67] CRITERIA REGARDING AGING SIMULATION (IF REQUIRED) (IF REQUIRED) (IF REQUIRED) (IF REQUIRED) | CFICIENT DUIPMENT ITEMS |
|---|-------------------------------|
| 2. ADEQUATE SIMILARITY BETWEEN EQUIPMENT AND TEST SPECIMEN ESTABLISHED- (EQUIPMENT ITEM NO(S).: 1, 2, 4, 5, 6, 10, 29, 30, 34, 35, 46, 55, 64, 66, 67] 3. AGING DEGRADATION EVALUATED ADEQUATELY- (EQUIPMENT ITEM NO(S).: 1, 2, 4, 5, 6, 8, 9, 33, 41, 45, 46, 47, 48, 50, 67] 4. QUALIFIED LIFE OR REPLACEMENT SCHEDULE ESTABLISHED (IF REQUIRED)- (EQUIPMENT ITEM NO(S).: 1, 2, 4, 5, 6, 8, 9, 13, 14, 16, 18, 27, 29, 30, 33, 37, 38, 39, 40, 41, 45, 46, 47, 48, 50, 55, 67] 5. PROGRAM ESTABLISHED TO IDENTIFY AGING DEGRADATION- (EQUIPMENT ITEM NO(S).: 1, 2, 4, 5, 6, 41, 45, 47, 48, 50, 67] 6. CRITERIA REGARDING AGING SIMULATION (IF REQUIRED)- 7. CRITERIA REGARDING TEMPERATUPE/PRESSURE EXPOSURE: | 17 |
| 3. AGING DEGRADATION EVALUATED ADEQUATELY (EQUIPMENT ITEM NO(S).: 1, 2, 4, 5, 6, 8, 9, 33, 41, 45, 46, 47, 48, 50, 67] 4. QUALIFIED LIFE OR REPLACEMENT SCHEDULE ESTABLISHED (IF REQUIRED) (EQUIPMENT ITEM NO(S).: 1, 2, 4, 5, 6, 8, 9, 13, 14, 16, 18, 27, 29, 30, 33, 37, 38, 39, 40, 41, 45, 46, 47, 48, 50, 55, 67] 5. PROGRAM ESTABLISHED TO IDENTIFY AGING DEGRADATION | 15 |
| 4. QUALIFIED LIFE OR REPLACEMENT SCHEDULE ESTABLISHED (IF REQUIRED) [EQUIPMENT ITEM NO(S).: 1, 2, 4, 5, 6, 8, 9, 13, 14, 16, 18, 27, 29, 30, 33, 37, 38, 39, 40, 41, 45, 46, 47, 48, 50, 55, 67] 5. PROGRAM ESTABLISHED TO IDENTIFY AGING DEGRADATION [EQUIPMENT ITEM NO(S).: 1, 2, 4, 5, 6, 41, 45, 47, 48, 50, 67] 6. CRITERIA REGARDING AGING SIMULATION (IF REQUIRED) 7. CRITERIA REGARDING TEMPERATUPE/PRESSURE EXPOSURE: | 15 |
| 5. PROGRAM ESTABLISHED TO IDENTIFY AGING DEGRADATION | 27 |
| 6. CRITERIA REGARDING AGING SIMULATION (IF REQUIRED) 7. CRITERIA REGARDING TEMPERATURE/PRESSURE EXPOSURE: | 11 |
| 7. CRITERIA REGARDING TEMPERATURE/PRESSURE EXPOSURE: | 0 |
| A PEAK TEMPERATURE ADEQUATE | 8 |
| B PEAK PRESSURE ADEQUATE- [EQUIPMENT ITEM NO(S).: 1, 2, 4, 5, 6, 8, 9, 50] | 8 |
| C DURATION ADEQUATE : EQUIPMENT ITEM NO(S).: 1, 2, 4, 5, 6, 8, 9, 50] | 8 |

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Table 4-2 (Cont.)

QUALIFICATION DEFICIENCY SUMMARY

| NRC REQUIREMENT | UMBER OF EFICIENT QUIPMENT ITEMS |
|--|---|
| | |
| <pre>D REQUIRED PROFILE ENVELOPED ADEQUATELY</pre> | 8 |
| E STEAM EXPOSURE (IF REQUIRED) ADEQUATE [EQUIPMENT ITEM NO(S).: 1, 2, 4, 5, 6, 8, 9, 50] | я |
| 8. CRITERIA REGARDING SPRAY SATISFIED | 5 |
| 9. CRITERIA REGARDING SUBMERGENCE SATISFIED | 3 |
| 10. CRITERIA REGARDING RADIATION SATISFIED | 13 |
| 11. CRITERIA REGARDING TEST SEQUENCE SATISFIED [EQUIPMENT ITEM NO(S).: 45, 47, 50] | 3 |
| 12. CRITERIA REGARDING TEST FAILURES OR SEVERE ANOMALIES (IF ANY) SATISFIED | 0 |
| 13. CRITERIA REGARDING FUNCTIONAL TESTING SATISFIED | 0 |
| 14. CRITERIA REGARDING INSTRUMENT ACCURACY SATISFIED | 0 |
| 15. TEST DURATION MARGIN (1 HOUR + FUNCTION TIME) SATISFIED | 0 |
| 16. CRITERIA REGARDING MARGINS SATISFIED (NUREG=0588, CAT, 1)= | 0 |
| | |

TABLE 4-3

LICENSEE CORRECTIVE ACTION SUMMARY

| c | DRRECTIVE ACTION DESCRIPTION | NUMBER OF EQUIPMENT ITEMS |
|--|---|---------------------------------|
| 1. EQUIPMENT REPLACEMENT WITH [EQUIPMENT ITEM N 9, 41, 43, 45, | QUALIFIED EQUIPMENT | 15 |
| 2. EQUIPMENT MODIFICATION | | 0 |
| 3. EQUIPMENT RELOCATION ABOVE [EQUIPMENT ITEM N | SUBMERGENCE LEVEL | 3 |
| 4. RELOCATE OR SHIELD EQUIPME | NT FROM RADIATION SOURCE | 0 |
| 5. VERIFY QUALIFICATION BY AD [EQUIPMENT ITEM N | DITIONAL TESTING/ANALYSIS | 2 |
| 6. EQUIPMENT RELOCATION TO A | MILD ENVIRONMENT | 0 . |
| 7. QUALIFICATION TESTING OF E | QUIPMENT IN PROGRESS | 0 |
| 8. OTHER (FOR DETAILED DESCRI [EQUIPMENT ITEM N 50, 55, 63] | PTION SEE SPECIFIC EQUIPMENT ITEMS IC(S).: 17, 27, 33, 38, 39, 40, |) 9 |
| SCHEDULE FOR COMPLETION OF CO PROVIDED (SEE SPECIFIC EQUIPM [EQUIPMENT ITEM N 9, 27, 33, 41, | RRECTIVE ACTION(S) HAS BEEN MENT ITEM FOR COMPLETION DATE) NO(S).: 1, 2, 4, 5, 6, 8, 45, 46, 47, 49, 50, 55, 63, 65, 6 | 19 7 J |

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Table 4-4

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

| | 1 | | | | FRC | EQU | | *=== NT I | ==== TEH | NIIMB | FRS | **** | | | |
|---|------------|------|------|-------|-------|------|-----------|--------------|-------------|-------|-----|--------|-------|-----|------|
| | 1001 | 1002 | 1003 | 1004 | 1005 | 1006 | 1007 | 1008 | 1000 | | | 二日本市市市 | EERS: | | |
| | | | | | | | | | | | | | REEL | | 2222 |
| (DESIGNATIONIX = DEFICIENCY) | 1 | 1 | 1 | 1 | 1 | 1 | 1 | : | 1 | 1 | 1 | 1 | 1 | 1 | 1 |
| 1 1. DOCUMENTED EVIDENCE OF QUALIFICATION ADEQUATE | -i x | i x | ł. | x | 1 X | 1 x | | x | x | 1 | 1 | 1 | 1 | | |
| 1 TEST SPECIMEN ESTABLISHED | -i x | 1. | 1 | 1 . | | | : : | | | 1 | 1 | | | | 1 |
| AGING DEGRADATION EVALUATED ADEQUATELY | -1 X | i X | i | ix | ix | ix | | x | x | 1 | | | | | |
| ESTABLISHED (IF REQUIRED) | -1 X | 1 X | 1 | 1 X | 1 X | I X | 1 | I X | i x | i | i | i | i x | | |
| 6. CRITERIA REGARDING AGING SINULATION SATISFIED (IF REQUIRED) | -1 X -1 | 1 X | 1 | 1 X | 1 X | 1 X | 1 | 1 | 1 | 1 | 1 | 1 | 1 | | 1 |
| A PEAK TEMPERATURE ADEQUATE | 1 | 1 | 1 | 1 | 1 | 1 | 1 1 | 1 1 | | 1 | 1 1 | 1 | 1 1 | 1 | 1 |
| B PEAK PRESSURE ADEGUATE | -1 X | 1 X | 1 | X | 1 X | X | | X | X | 1 | 1 | | 1 | 1 1 | 1 |
| C DURATION ADEQUATE | -1 2 | i x | 1 | 1 2 | | | | | X | 1 | 1 | | | | 1 |
| D REQUIRED PROFILE ENVELOPED ADEQUATELY | -1 X | ix | î. | ix | ix | ix | | Ŷ | â | : | | | | | |
| E STEAM EXPOSURE (IF RECUIRED) ADEQUATE | -1 X | 1 X | 1 | I X | X | I X | ii | iñ | x | ; | | | | | |
| B. CRITERIA REGARDING SPEAY SATISFIED | - 1 | 1 | 1 | 1 | 1 | 1 | 1 1 | X | X | 1 | 1 | | | | |
| 1 10. CRITERIA REGARDING SUBPERGENCE SATISFIED | - 1 | 1 | 1 | 1 | t - 1 | 1 | 1 1 | 1 | 1 | 1 | 1 | | 1 1 | | 1 |
| 1 11. CRITERIA REGARDING TEST SEQUENCE SATISFIED | | ÷ . | 1 | | ! | 1 | 8 1 | X | X | 1 | 1 | | 1 | 1.1 | 1 |
| 1 12. CRITERIA REGARDING TEST FAILURES OF SEVERE ANUMALIES | 1 | i . | i | 1 | 1 | 1 | | | | 1 | 1 | | | | 1 |
| 1 13. CRITERIA RECARDING FUNCTIONAL TECTUC SATISFIED | -1 | 1 | 1 | 1 | 1 | 1 | 1 1 | t - 1 | | 1 | 1 | | | | i |
| 1 14. CRITERIA REGARDING INSTRUMENT ACCURACY SATISFIED | | 1.1 | ÷ | | 1.1 | 1 | | | 1 | 1 | 1 | 1 1 | 1 1 | 1 1 | |
| 1 15. TEST DURATION MARGIN (1 HOUR + FUNCTION TIME) SATISFIED | | : | 1 | | | | | | | 1 | 1 | | | | 1 |
| 1 16. CRITERIA REGARDING MARGINS SATISFIED (NUREG-0588, CAT. 1) | -1 | i | i | 1 | | | | | | : | | | | | |
| | | | | | | | | | | | | | | | |
| (DESIGNATION: X = CATEGORY) | 1 | 1 | 1 | 1 | 1 | 1 1 | 1 1 | 1 1 | 1 | 1 | 1 | 1 | 1 1 | 1 1 | 1 |
| I I.A EQUIPMENT QUALIFIED | 4 | : | 1 | | | | | | | 1 | 1 | | | | 4 |
| 1 I.B EQUIPMENT QUALIFICATION PENDING MODIFICATION | . x | i x | : | | | | | | 1.1 | 1 | | | | | 1 |
| I II.A EQUIPMENT QUALIFICATION NOT ESTABLISHED | -1 | 1 | 1 | 1 | 1 | 1 | | | | i x | | | | | 1 |
| I II.8 EQUIPMENT NOT QUALIFIED | - 1 | 1 | 1 | 1 1 | 1 | 1 | | | | 1 | i | | | | |
| I II.C EOUIPMENT SATISFIES ALL REQUIREMENTS EXCEPT | 1 | 1 | 1 | 1 1 | 1 | 1 | 1 1 | | | 1 | i 1 | | | | 1 |
| I GOALIFIED LIFE ON REPLACEMENT SCHEDULE JUSTIFIED- | - 1 | 1 | : | 1 1 | 1 | 1 | 1 1 | 1 1 | 1 | ! | 1 1 | | X | X | 1 |
| I II.B FOULDARIT AASATI FROM GUARDIFICATION | | 1 | 1 | 1 | | | 1 | | | 1 | 1 1 | XI | 1 1 | 1 | X I |
| IV DOCUMENTATION NOT MADE AVAILABLE | | : | X | | | | X | | | 1 | X | | | 1 | 1 |
| | | | | | | | | | | 1 | | | | 1 | : |
| 1 CORRECTIVE ACTION SPECIFIED (DESIGNATION: X = ACTION SPECIFIED) | : | 1 | 1 | 1 1 | 1 | 1 | 1 | | | | | | | | |
| | 1 | 1 | 1 | 1 1 | | | | | | | | | | | |
| 1 1. EQUIPMENT REPLACEMENT WITH QUALIFIED EQUIPMENT | 1 X | 1 X | 1 | 1 X 1 | X | XI | 1 | X | X | 1 | i i | | | 1 | i |
| A FOULPMENT DELACATION ABOUT THE CONFEDERACE LEVE | 1 | 1 | 1 | 1 1 | | 1 1 | 1 | 1 | 1 | 1 | 1 1 | 1 | 1 | 1 | 1 |
| 4. RELUCATE OF SHIELD FOULPHENT FROM RADIATION SOURCE | - | | | | | | | 1 | | 1 | 1 | 1 | 1 | 1 | 1 |
| 1 5. VERIFY QUALIFICATION BY ADDITIONAL TESTING/ANALYSIS | | | | | | | | | | 1 | | | | 1 | 1 |
| 1 6. EQUIPMENT RELOCATION TO A MILD ENVIRONMENT | 1 | | | | | | | | | | | | | 1 | 1 |
| 1 7. QUALIFICATION TESTING OF EQUIPMENT IN PROGRESS | 1 | 1 | 1 | 1 | | | | | | | | | | | - |
| 8. OTHER (SEE SPECIFIC EQUIPMENT ITEM IF CHECKED) | 1 | 1 | : | 1 1 | | 1 | 1 | | | 1 | | | | 1 | i |
| Coupoil o participation of couporation interview | 1 | : | 1 1 | 1 1 | 1 | 1 1 | 1 | 1 | | 1 1 | 1 | 1 | 1 | i | 1 |
| SCREDURE FOR CONFERENCE OF CORRECTIVE ACTION(S) HAS BEEN PROVIDED | : X | 1 X | | X 1 | X | X 1 | 1 | X | X | 1 1 | 1 1 | 1 | 1 | 1 | 1 |
| | | | | | | | E E E E E | | | | | | | | |

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FOULPHENT ENVIRONMENTAL QUALIFICATION SUPPARY FORM

| | | | | | FRC | Euil | - | 1 17 | | | RS | | | **** | |
|---|------|------|------|------|-------|------|------|------|-----|-------|------|------|-------|------|-------|
| | | | | | | | | | | | | | | | |
| | 1016 | 1017 | 1018 | 1019 | 0201 | 0211 | 0271 | 023: | 024 | 0251 | 0261 | 0271 | 028; | 0291 | 10101 |
| I NRC REQUIREMENTS (DESIGNATION: X = DEFICIENCY) | 1 | 1 | 1 | 1 | | | 1 | 1 | 1 | 1 | 1 | - | | 1 | 1 |
| 1 | 1 | 1 | 1 | 1 | | | 1 | 1 | 1 | i i | 1 | 1.1 | 1 1 | 1 | 1 |
| 1. DOCUMENTED EVIDENCE OF GUALIFICATION ADEQUATE | 1 | 1 | : | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 1 | X 1 | XI |
| 1 2. ADEQUATE SIMILARITY BETWEEN EQUIPMENT AND | 1 | 1 | 1 | 1 1 | 1 1 | | 1 | 1 | 1 | 1 1 | 1 | . 1 | 1 1 | 1 | 1 |
| I TEST SPECIFER ESTABLISHED | 1 | 1 | 1 | 1 | 1 1 | | 4 | 1 | | 1 1 | 1 | 1.1 | | XI | XI |
| 1 3. AGING DEGRADATIO" EVALUATED ADEGGATELY | 1 | 1 | | 1 | 1 1 | | 1 | 1 | | | | | | | |
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| 7. CRITERIA REGARDING TEMPERATURE/PRESSURE EXPOSURE: | i i | 1 | i | 1 | 1 | | 1 | 1 | | | 1 | | 1 1 | - 1 | 1 |
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| C DURATION ADEQUATE | 1 | 1 | 1 | 1 | | | | 1 | | | | | | 1.3 | |
| 1 D REQUIRED PROFILE ENVELOPED ADEQUATELY- | | 1 | 1 | | | | | | | | | | | - 3 | |
| E - STEAM EXPOSUPE (IF REGIMED) ADEGUATE | | 1 | | | | | | | | | : | | | | |
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| 1 10. CRITERIA REGARDING RADIATION SATISFIED | i | 1 | i | i (| 1 | | i | 1 | | | 1 | | 1 1 | 1 | i (|
| 1 11. CRITERIA REGARDING TES: SEQUENCE SATISFIED | 1 | 1 | 1 | 1 | 1 1 | 1 | 1 1 | 1 | 1 1 | 1 1 | 1 | 1 | 1 1 | 1 | 1 |
| 1 12. CRITERIA REGARDING TEST FAILURES OR SEVERE ANOMALIES | 1 | 1 | 1 | : | 1 1 | 1 | 1 1 | 1 | 1 | 1 1 | 1 | | 1 1 | 1.1 | 1 |
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| 1 13. CRITERIA REGARDING FUNCTIONAL TESTING SATISFIED | 1 | 1 | 1 | | | | | 1 | | | | | | | |
| 1 14. CRITERIA REGARDING INSTRUMENT ACCURACY SATISFIED | 1 | 1 | | | | | | 1.1 | | | | | | | |
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14 I. I.

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORK

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EQUIPMENT ENVIRONMENTAL QUALIFICATION SURMARY FORM

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4.3 METHODOLOGY USED BY THE LICENSEE

This section includes observations concerning the Licensee's qualification methodology presented in the response [62] to the NRC SER.

4.3.1 Aging and Qualified Life

The Licensee has not adequately addressed the related topics of aging and qualified life. The DOR Guidelines require that the Licensee:

- establish the qualified life for all equipment items containing components susceptible to degradation produced by heat and nuclear radiations
- implement programs to review detailed surveillance and maintenance records to assure that equipment that exhibits age-related degradation is identified and replaced (or modified) as necessary
- o establish justifiable replacement schedules (where necessary) to maintain qualification of equipment.

The qualified life of equipment is the maximum period of service under specified conditions for which it can be demonstrated that the functional capability at the end of the period is adequate for the equipment to perform its specified safety function(s) for applicable design basis events. The qualified life may be contingent on implementation of a specified maintenance program. It is acceptable for the qualified life of some subcomponents of an equipment item to be less than the qualified life of the item itself, provided a program for replacement of such components at intervals not exceeding their qualified lifetimes is specified and fulfilled. The qualified life of an equipment item may be changed during its installed life when justified by new information that permits a reanalysis of the qualification program.

Establishing the qualified life for equipment is a technically challenging task because of the paucity of information concerning the degradation of assemblies of materials and components under long-term exposure to the combined environmental service conditions in a nuclear power generating station. As is discussed more fully in Reference 1417, with the possible exception of certain simple items, there is no rigorous basis for establishing equipment qualified lifetimes for periods approaching an installed lifetime of 40 years. Further-

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more, applicable information regarding possible long-term synergistic effects of temperature, humidity, nuclear radiations, etc., is extremely limited.

The Licensee has supplied information in Reference 30 on its surveillance/maintenance program for detection of age-related failure. This program is based on the detection, documentation, and resolution of failures during operation, testing, or calibration. According to the Licensee, failures are reviewed and, where aging is suspected, similar components will be investigated and corrective actions initiated, if necessary.

It is noted that a suitable surveillance program should monitor deterioration and help to verify qualified life estimates. That is, the program should indicate how much deterioration has accumulated and, as far as possible, how much functional resource remains before the end point is reached, beyond which environmental stress could cause failure. Although a specific end point for the equipment may not be known, the observation of an increased rate of change in a degradation-related parameter is usually indicative of an acceleration in the depletion of remaining resources. The parameters surveyed should be based on careful review of equipment failure modes and potentially significant degradation mechanisms. It is imperative that engineering analysis, judgment, and experience be employed in properly evaluating the data obtained through the surveillance program so that corrective action can be taken before the end point is reached. With judicious selection, one or two parameters may prove sufficient to represent multiple degradation mechanisms.

The Licensee's surveillance program does not specifically address degradation-related parameters. The Licensee has provided no information indicating how detected failures or failure modes are correlated to specific age-degradation concerns. Although indication of increased failure rate can provide evidence of age-related degradation in populations of equipment items, it is not adequate as a sole means of monitoring these effects. If observable increases in failure frequency are relied on for detecting age-related phenonomena, significant aging may already have occurred in equipment, thereby increasing the potential for common-mode failure under abnormal stress conditions before corrective action can be taken. Relying solely on

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observable increases in the number of failures as a means of monitoring age-degradation can make initial detection difficult, especially when equipment populations have mixed ages.

The Licensee has provided no information on preventive maintenance programs which reliably maintain the equipment below end point conditions. Preventive maintenance actions should particularly address those degradation mechanisms which affect the ability of the equipment to perform its safety function and should ensure that the degraded components and materials are refurbished or replaced as necessary to maintain qualification. The component "replacement schedule" discussed in Section 7.0 of the DOR Guidelines is, in effect, a qualified life. It is not essential to use the term "qualified life," but the replacement schedule must be justified. The balance of preventive maintenance actions, such as realignment and recalibration, are designed to keep equipment performance within specifications.

4.3.2 Completeness of Equipment List

4.3.2.1 Equipment Important to Safety

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The NRC SER [61], Section 3.1, and TER-C5257-178 [59], Section 4.1.1, address certain equipment important to safety which the Licensee had not included on its equipment list. The Licensee responded as follows [62]:

- "3. In Section 4.1.1, it is stated that certain identified safety-related equipment was not included in the list of equipment to be qualified. Each item is discussed below:
 - a. solenoids controlling air-operated containment isolation valves

 Only those solenoids in a 'harsh' environment were identified
 in our previous submittals. Other solenoids will be addressed
 in future submittals. Since these are located in a "mild"
 environment, discussion can be deferred at this time.
 - b) solenoids controlling air-operated values 4561 and 4562 same as a) above.
 - c) motorized valve actuators for valves 313, 813, and 814 As noted for solenoids controlling air-operated valves, RG&E did not generally address MVA's in a mild environment. This will be done in future submittals. Discussion of these items can be deferred in the interim, since they are located in a mild environment.

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- d) other motorized valve actuators for other containment isolation valves - same as c) above.
- e) motorized valve actuators for 704 A, B These MVA's will see a harsh radiation environment during post-LOCA sump recirculation. Their qualification is addressed in RG&E's Reference 53; however, they were not specifically identified in our October 31, 1980 submittal. These MVA's will be added to item 8E of Table 3 of that submittal.
- 4. In Section 4.1.1, FRC notes that certain electrical equipment was identified in the DITER, but not addressed in RG&E's October 31, 1980 submittal. The equipment, and reason for not including it, follows:
 - a) junction boxes and terminal boards located outside containment -Most of these items are located in a 'mild' environment. An evaluation of the effects of a steam line break in the intermediate building on such items is still under review. Since the Standby AFW System, used to mitigate a steamline break, is located outside the intermediate building, it is not expected that this would be a concern. However, the evaluation will be provided when completed.
 - b) control stations this equipment is located in a 'mild' environment. Discussion can thus be deferred.
 - c) Class 1E medium voltage switchgear same as b) above.
 - d) Class 1E motor control centers same as b) above.
 - e) inverters same as b) above.
 - f) battery chargers same as b) above.
 - g) hydrogen monitors This equipment is being procured and installed as a 'TMI modification.' Qualification documentation will be provided in accordance with the NRC's Generic Letter 81-05 dated January 19, 1981.
 - h) charcoal filter deluge valves These valves are 'additional protection,' useful but not required for protection of the charcoal filters. Although it is expected that these valves would operate, no credit is taken for these valves in the plant safety analysis. Qualification is thus not required."

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The Licensee's response as outlined above has been evaluated and found to adequately resolve the SER and TER concerns. Further discussion and evaluation of other equipment items of concern are contained in Appendix C of this report.

4.3.2.2 Equipment Identified in the Emergency Procedure

TER-C5257-178 [59], Section 4.1.1, expressed the concern:

"The Licensee discusses the concept that not all equipment mentioned in the Emergency Procedures needs to be qualified, but it is not clear how the Licensee determined (a) which items of instrumentation and control to include and (b) how the operator will know which instruments are likely to be giving reliable information."

The Licensee responded to this concern as follows [62]:

"In Section 4.1.1 of the TER, it is noted that RG&E did not attempt to qualify all equipment mentioned in the Emergency Procedures, and no criteria for selection was presented. The following is RG&E's rationale:

RG&E has selected for qualification those items which are safetyrelated, and perform a necessary post-accident mitigation function. Other items specified in the Emergency Procedures provide additional flexibility to the operator in performing post-accident functions; they are not required, and no credit for the operation of these items is taken in the plant safety analyses.

The potential for operator confusion, based on erroneous indications of non-qualified equipment, is accounted for in the Emergency Procedures. Specific requirements are detailed in the discussion of the particular instrumentation, and will be discussed later in this attachment."

It is considered that the Licensee's response adequately resolves this issue.

4.3.2.3 Equipment Located in HELB Areas

TER-C5257-178 [59], Section 4.1.2, expressed the concern:

"As is noted in Section 4.1.1, it is not clear that the Licensee has included all HELB environments that should be considered, including water sprays. Supplement 2 to IE Bulletin 79-01B states that the Licensee should apply the guidance presented in Regulatory Guide 1.46 and Standard Review Plans 3.6.1 and 3.6.2. The Licensee states:

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'The failure of steam heating lines in the Auxiliary Building was identified and discussed in Reference (HELB-1). It has been determined that steam heating lines also traverse other areas in the vicinity of safety related equipment (Reference HELB-15). Modifications are planned which will isolate the steam heating line to the affected areas in the event of a failure and therefore preclude an adverse environment. The commitment to perform analyses/modifications for those pipe breaks outside containment are given in Reference (HELB-13). Prior to its installation, regular inspections are being performed to reduce the likelihood of a failure creating an adverse environment.'

This statement suggests that there may be additional equipment subject to a harsh environment beyond that listed in Appendix B or that the environmental service conditions may be more severe for some of the listed equipment than has been assumed in the analyses provided to date."

The Licensee responded to this concern as follows [62]:

"In Section 4.1.1 of the TER, it is stated that it was unclear if the criteria used by RG&E for selection of systems to be evaluated were in accordance with the DOR Guidelines. This confusion arises from the NRC review of SEP Topic III-5.B, 'Pipe Break Outside Containment'. In the resolution of this topic, RG&E committed to make modifications to the sceam heating lines, or provide leak detection in the vicinity of required safety-related electrical equipment, such that a harsh environment would be prevented from occurring. This modification, when complete, will negate the need to evaluate the effects of a harsh environment on the electrical equipment. Justification for the present arrangement, until modifications are made, are presented in the SEP topic review documentation."

It is considered that the Licensee's response adequately resolves this issue.

4.3.3 Environmental Service Conditions

4.3.3.1 Temperature, Pressure, and Humidity Conditions Inside Containment

In response to the NRC SER [61] Section 3.3 concerns, the Licensee stated [62]:

"In Section 3.3, the NRC concludes that the Ginna specified peak post-LOCA temperature should be the steam saturation temperature corresponding to the total building pressure, rather than the steam saturation temperature corresponding to the partial pressure of steam only. This would include margin to account for higher than average temperatures in the upper regions of the containment that can exist due to stratification, especially following a steam line break.

RG&E does not intend to modify the Ginna post-accident temperature profile, since we have serious reservations concerning both the method of imposition of this new requirement, and its technical validity for Ginna. As expressed in the attachment to our February 20, 1981 response to the NRC's 'Partial Review, Equipment Evaluation Report by the Office of Nuclear Reactor Regulation':

- 'a) The purpose of the October 31, 1980 RG&E submittal was to respond to the September 19, 1980 Commission Order, requiring submittal of information to show compliance with the "DOR Guidelines." The "DOR Guidelines" explicitly state in Section 4.2.1 that "...equipment qualified for a LOCA environment is considered qualified for a MSLB accident environment in plant with automatic spray systems not subject to disabling single component failures." In Appendix A of FRC Project C5257, it is stated that "...the design of the Ginna plant satisfies these criteria." We consider it inappropriate that the staff would modify explicit previous guidance via this "Partial Review". The requirement to meet a 307°F temperature envelope is obviously beyond the requirements of the "DOR Guidelines."
- b) The apparent reason for this new requirement is to provide margin to account for higher than average temperatures in the upper regions of containment due to potential stratification. RG&E does not have any safety-related electrical equipment in this area of containment. Therefore, the basis for the staff concern does not apply to the Ginna plant.
- c) Since it is not conceivable that all the air in containment would be expelled after a LOCA or MSLB, it does not appear reasonable to determine margin in this manner. The criteria of IEEE-323-1974, together with the margin inherent in the analyses arriving at containment conditions, serve as ample assurance of the determination of conservative environmental conditions.

Further, the Ginna-specific post-accident pressure and temperature profiles are being evaluated by the NRC as part of the Systematic Evaluation Program, Topics VI-2.D and VI-3. Proper post-accident profiles will be available following conclusion of these SEP topics for Ginna'."

The Licensee has provided revised temperature/pressure environmental profiles [74]. These profiles are included in Appendix A of this report and have been used for the equipment qualification review.

4.3.3.2 Qualification Time Requirement

The Licensee responded to TER-C5257-178 [59] Section 4.1.2 concerns on qualification time requirements [62]:

"In Section 4.1.2, FRC judges that RG&E has not provided acceptable justification for ignoring the 'minimum of one hour' guideline. It is then stated that the NRC's rationale for this requirement is presented in Section 2.2.4 of this report. However, Section 2.2.4 merely reiterates, with no elaboration or discussion as to its basis, the statement that '... the [NRC] staff has indicated that time is the most significant factor in terms of the margins required to provide an acceptable confidence level that a safety-related function will be completed. The l-hour qualification requirement is based on the acceptance of a type test for a single unit and the spectrum of accidents (small and large breaks) bounded by a single test.'

RG&E accounts for margin by specifying a conservatively calculated qualification profile, accounting for the potential occurrence of small and large breaks. Additional margin is not required.

Nevertheless, except for the reactor trip switchgear, RG&E did not specifically take credit for operating times of less than one hour in our October 31, 1980 submittal, other than for several specific pieces of equipment in the area of submergence. The guidelines of Section 2.2.2 are considered in the discussion of the specific items affected."

The selection of 1 hour-plus-operating-time as a margin for test duration applies to equipment whose safety function is performed within a short time (e.g., seconds or minutes). Exceptions to this NRC criterion (see Section 2 of this report) were presented by the NRC in July 1981 at the industry EEQ meetings held in Bethesda, Md. as follows:

"Exception: For Less Than 1 Hour:

- Provide assurance specified time is required functional time for entire spectrum of DBE.
- Subsequent failure of equipment will not degrade the safety of the plant or mislead an operator.
- o Equipment not required after primary function accomplished."

The Licensee has not provided an acceptable alternative to the specified NRC requirements.

4.3.3.3 Containment Spray

Section 3.2 of the NRC SER [61] required that the Licensee verify that the Ginna containment spray system is an automatic system which satisfies the single failure criterion. In response, the Licensee stated [62]:

"In Section 3.2., it is stated that the NRC requires the licensee to verify that the Containment Spray System is not subject to a disabling single component failure. This has been done. The Containment Spray System is a fully-redundant system, not subject to credible disabling single component failures. The single suction line from the RWST, with valves 396A and 896B, in series, has been addressed in the Ginna Technical Specification, Section 3.3.1.1.g. RG&E's 'ECCS Single Failure' analysis, accepted by the NRC staff in Amendment No. 7, was again reviewed and accepted by letter from Dennis M. Crutchfield, NRC, to John E. Maier, RG&E, 'SEP Topics VI-7.C and VI-7.C.2,' dated February 20, 1981. The Ginna Containment Spray System thus satisfies the DOR Guideline requirements of Section 4.2.1."

It is considered that this SER concers has been resolved.

4.3.3.4 Submergence

Section 3.5 of the NRC SER [61] equested that the Licensee provide the flood level elevation in containment, in addition to the flooded depth. An assessment of failure modes associated with the submergence of equipment was also requested. The Licensee responded in the following manner [62]:

"In Section 3.5, the NRC states that RG&E provided information relative to maximum submergence in containment (7 feet), but not the elevation level. The elevation of the containment basement floor is 235'8", the maximum submerged elevation level is thus 242'8". This information will be added to Table 4 of RG&E's report.

In Section 3.5, it is stated that the licensee should provide an assessment of the failure modes associated with submergence of equipment, and ensure that subsequent failures of the equipment will not adversely affect the safety functions or mislead an operator. RG&E provides such information for each potentially affected item of equipment, as well as time of flooding if applicable, in the discussion of the individual equipment items."

It is considered that this SER concern has been resolved.

4.3.4 Nuclear Radiation Dose

Section 4.1.2 of TER-C5257-178 [59] stated:

"The Licensee has used an integrated nuclear radiation dose of 160 Mrd for equipment within containment. FRC has assumed that this value includes both beta and gamma radiations. The Guidelines permit a lower integrated dose value for equipment which would not be affected by beta radiations. In the case of electric cables, protection against beta radiation would be desirable. A more detailed discussion is presented in Appendix H. In addition, the Guidelines require consideration of radiation exposure to equipment outside containment due to recirculating radioactive fluid. This was not consistently done by the Licensee."

The Licensee provided the following response [62]:

"In Section 4.1.2, Nuclear Radiation Dose, reference is made to Appendix H of the TER, entitled, 'Effects of Nuclear Radiation Dose Rate on Cable Performance During a LOCA.' This appendix makes reference to the fact that greater degradation may occur at higher dose rates than were used in qualification testing. It should be noted that this 'finding' has not been previously addressed in NRC criteria, including the DOR Guidelines. Furthermore, no specific references in the technical literature are cited, which makes it impossible for the RG&E technical staff to review the validity or applicability of the data. In general, RG&E testing and analysis related to dose rate in insulating materials is consistent with IEEE Std. 278, 'USIA and IEEE Guide for Classifying Electrical Insulating Materials Exposed to Neutron and Gamma Radiation.' Since failure of electrical cables to perform their required safety functions due to higher dose rates is still the subject of research, and clearly beyond present-day regulatory criteria, we consider that it is inappropriate for discussion in this review. RG&E considers that the radiation qualification requirements specified for Ginna are very severe, and that equipment shown operable after exposure to this dose would operate in a post-accident environment. RG&E has reviewed several other plant TER's not prepared by FRC, and did not find this to be an area of concern. These other reviews appear to be more consistent with the DOR Guidelines. A consistent approach should be used for Ginna."

The Licensee has addressed only part of the concern identified in the TER [59]. The first concern was whether the effect of beta radiation had been considered as required by the DOR Guidelines (Section 4.1.2, Beta Radiation Doses). The Licensee has not adequately addressed this concern.

The second concern was whether the effects of radiation dose and dose rate occurring <u>during the accident</u> on cable characteristics such as insulation resistance had been considered by the Licensee. Test data on these effects

have been available to cable manufacturers and NSSS suppliers since 1974 and the need to consider these effects has also been recognized by IEEE in developing Standard 383-74. It is the responsibility of the Licensee to establish that the safety-related cables perform the required functions during the accident as well as in the post-accident period.

4.4 EQUIPMENT ENVIRONMENTAL QUALIFICATION EVALUATION

The evaluation presented in this section of the report includes, for each equipment item, completed equipment environmental qualification review checksheets (partially handwritten) which present both the technical information necessary to conduct the review and the results of the evaluation.

LEQUIPMENT ENVIRONMENTAL QUALIFICATION ! EQUIPMENT ITEM CHECKSHEET INDEX !

| FRC | | | | |
|------|---------------------------|----------------------|-------------------------------|------------------------------|
| ITEM | COMPONENT | WANDER CRUSES | NOTEL WINDER | 100+*100 |
| NU. | COMPONENT | HANDPACTURER | MODEL NUMPER | LOCATION |
| | COLENOTO NALVE | | | |
| | SOLENOID VALVE | ASCO | LH03006610 | |
| 4 | SOLENOID VALVE | ASCO | LREJOOB64RU | TURBINE BLOG, |
| 3 | SOLENOID VALVE | COPES VULCAN | D10060 | AUXILIART BLDG. |
| 4 | SOLENOID VALVE | LAWRENCE | 110114W | INTERMEDIATE BOUG. |
| 2 | SULENGID VALVE | LAWHENCE | 125434W | INTERMEDIATE BLUG. |
| 0 | SUCENDID VALVE | VERSA | 450 | CONTAINMENT BLOG., AREA I |
| 1 | SOLENOID VALVE | ASCO | ND | AUXILIARY BLDG. |
| 8 | SOLENOID VALVE | VENSA | V5G3/31 | CONTAINMENT BLOG., AVEA 1 |
| 9 | SOLENOID VALVE | VENSA | V3G3421 | CUNTAINMENT BLDG., AREA 1 |
| 10 | SOLENOID VALVE | VALCUN | V5/300 | CONTAINENT BLOG., AREA I |
| 11 | SOLENOID VALVE | JOHNSON CONTROLS | D251 | CONTROL BLOG. |
| 12 | MOTORIZED VALVE ACTUATOR | LIMITOROUE | SME2 WITH RELIANCE MOTOR | INSIDE CONTAINMENT |
| 13 | MOTORIZED VALVE ACTUATOR | LIMITORQUE | SMHOO WITH PEENLESS MOTOR | AUXILIANT BLOG. |
| 14 | MOTORIZED VALVE ACTUATOR | LIMITORQUE | SMBOO WITH RELIANCE MOTOR | AUXICIARY BLDG. |
| 15 | MOTORIZED VALVE ACTUATOR | LIMITORQUE | SMBOO WITH PELIANCE PUTCH | INTERMEDIATE HUDG., AREA 3 |
| 16 | MOTORIZED VALVE ACTUATOR | LINITORQUE | SHBOD WITH RELIANCE MUTOR | AUXILIANT BLOG., ANKA Z |
| 17 | MOTORIZED VALVE ACTUATOR | LIMITORQUE | SMBOD WITH PEERLESS MOTON | CONTAINMENT HLDG., AREA 6 |
| 18 | MOIORIZED VALVE ACTUATOR | LIMITOROUS | SMB1 WITH RELIANCE MOTOR | CONTAINMENT BLOG., AREA 1 |
| 19 | MOTORIZED VALVE ACTUATOR | LINITOROUE | SMBOO WITH RELIANCE MOTOR | AUXILIARY BLDG., ANEA 6 |
| 20 | ELECTRIC MUTOR | GENERAL ELECTRIC | TIPE K 250HP | AUXILIARY BLOG., ANNEX |
| 21 | ELECTRIC MUTOR | NESTINGHOUSE | 444TSTBDP 200 HP | AUXILIARY BLDG. |
| 22 | ELECTRIC MOTOR | WESTINGHOUSE | 444TSTBDP 150 HP | AUXILIARY BLOG. |
| 23 | ELECTRIC MOTOR | WESTINGHOUSE | 445TSTEDP | AUXILIARY BLDG. |
| 24 | ELECTRIC MOTOR | WESTINGHOUSE | SOSUSABDP | INTERMEDIATE BLOG., BASEMENT |
| 25 | ELECTRIC MOTOR | WESTINGHOUSE | 509USAFDP 350 HP | AUXILIARY BLDG. |
| 26 | ELECTRIC MOTOR | WESTINGHOUSE | 509UPHABDP 300 HP | SCREEN HOUSE |
| 21 | ELECTRIC MOTOR | WESTINGHOUSE | TEFC 2 HP | CONTAINMENT BLOG., APEA 1 |
| 28 | ELECTRIC MOTOR | U.S. ELECTRIC MOTORS | VEU 100 MP CLASS P INSULATION | AUXILIARY BLDG. |
| 29 | ELECTRIC MOTOR | WESTINGHOUSE | SHOP 2 HP CLANS & INSULATION | AUXILIARY HLDG. |
| 30 | ELECTRIC MOTOR | WESTINGHOUSE | SHOP 3 HP CLASS & INSULATION | AUXILIARY BLDG. |
| 31 | ELECTRICAL PENETRATION | CROUSE-HINDS | ND | CUNTAINMENT BLOG., AREA 1 |
| 32 | ELECTRICAL PENETRATION | WESTINGHOUSE | NO | CUNTAINMENT HLUG., AREA 1 |
| 3.9 | TERMINAL BLOCK | AESTINGHOOSE | 54224 | FONTALEMENT BLOG., AREA 1 |
| 34 | ELECTRICAL CANLE, CONTROL | KERITE | TIPE N' | DETAINMENT BLOG., AREA 1 |
| 35 | ELECTRICAL CARLE, POWER | KERITE | TIPE HI | CUNTAINMENT BLOG., AREA 1 |
| 36 | LLECTRICAL CABLE, CONTROL | KERITE | TPE HT | CONTRINE CONTAINMENT |
| 37 | ELECTRICAL CAPLE | COLEMAN CABLE | Did . | CONTAINMENT PLOG., AREA 1 |
| 38 | ELECTRICAL CABLE | COLEMAN CABLE | ND | OUTSIDE CONTAINMENT |
| 39 | ELECTRICAL CABLE | ROME CARLE | HO | OUTSIDE CONTAINACHT |
| 40 | ELECTRICAL CARLE | GENERAL CA E | ND | GUTSIDE CONTAINMENT |
| 41 | LEVEL TRANSMITTER | FOXPURO | 611GHASI | AUXILIARY BLUG. |
| 42 | LEVEL SWITCH | BARTON | 289 | AUXILIARY BLOG. |
| 43 | FLOW TRANSMITTER | BARTON | 332 | CONTAINMENT BLOG., AREA 1 |
| 44 | PRESSURE TRANSMITTEP | HARTON | 332 | INTERMEDIATE ALDG. |
| 4.5 | PRESSURE TRAUSHITTER | EOXBORO | 611G#DS1 | COPTAINTENT BLDG., AREA 1 |
| 46 | PRESSURE TREASAITTER | EOXBORD | 611GADST | INTERMEDIATE BLOG., AREA 3 |
| 47 | LEVEL TRAMSMITTER | FOXBORD | 613mint. "ODIFIED | CUNTAINMENT BLOG., AREA 1 |
| 48 | LEVEL TRANSMITTER | FOXBORD | 61300.031 | ADXILIARY BLDG., AREA 2 |
| 49 | LEVEL TRANSMITTER | FOXBORD | 61340851 | CONTAINMENT BLOG., AREA 1 |
| 50 | NT0 | ROSEMOUNT | 17538 | CONTAINMENT BLOG., AREA 1 |

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I EQUIPMENT ENVIRONMENTAL QUALIFICATION 1 1 EQUIPMENT ITEN CHECKSHEET INDEX 1

FRC

| TICH | | | | |
|------|--------------------------|--------------------|----------------------------|----------------------------|
| NO. | COMPONENT | HANUFACTURER | MODEL NUMBER | LOCATION |
| | | | | |
| 51 | BATTERY | GONED | FTA19 | CONTROL BLOG., AREA 8 |
| 52 | MOTOR-GENERATOR CONTROLS | ALCO DIESEL ENGINE | 251F | D/G ANNEX AREA, AREA 4 |
| 53 | DIESEL GENERATOR | WESTINGHOUSE | 1900 KH | D/G ANNEY ARFA, AREA 4 |
| 54 | ELECTRIC MOTUR | WESTINGHOUSE | TEFC | D/G ANNEX AREA, AREA 4 |
| 55 | ELECTRIC MOTOR | STINGHOUSE | 558.5 CSP | CONTAINMENT BLDG., AREA 1 |
| 56 | SWITCHGEAR | VESTINGHOUSE | DR50A1600A | INTERMEDIATE BLOG., AREA 3 |
| 57 | SWITCHGEAR | *ESTINGHOUSE | DH350F1200A | TURBINE BLDG., APEA 7 |
| 58 | PANEL, I AND C | FOXBORD | ND . | CONTROL PLOG., AREA 8 |
| 59 | PANEL, DISTRIBUTION | WESTINGHOUSE | ND | CUNTROL BLOG., AREA 8 |
| 60 | HVAC EQUIPHENT | *FSTINGHOUSE | 2162 | CONTROL BLOG., AREA 8 |
| 61 | ELECTRICAL CARLE SPLICE | LAYCHEM | WCSFN | CONTAINMENT BLOG., APEA 1 |
| 62 | LEVEL SWITCH | GEMS | SPECIALI SIMILAR TO LS1900 | CONTAINMENT BLOG., AREA 1 |
| 63 | HYDROGEN RECOMBINER | HESTINGHOUSE | GLA PART 43737 REV A | CONTAINMENT BLOG., AREA 1 |
| 64 | LIMIT SWITCH | MARCO | ND | CONTAINMENT BLDG., AREA 1 |
| 65 | TRANSFORMER | SCHAEVITZ | SOOHCA | CUNTAINEAT BLOG., AREA 1 |
| 66 | SOLENOID VALVE | VALCOR | AD. | CONTAINMENT BLOG, AREA 1 |
| 67 | PRESSURE TRAUSAITTER | DARTON | 332 | AUXILIARY HLDG. |
| | | | | |

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 1

Equipment Item No. 1 Solenoid Valves Located in Turbine Building (Area #7) Automatic Switch Co. (ASCO) Model LB8300B61U Actuates Feedwater Control Valves (V-4269, V-4270) Licensee Reference 1617 Required Operating Time: Short term (SI signal) TER Checksheet No. 1 Reference 59, Section 4.5.2.6 Licensee Submittal: Page 9 [62]; Table 3, Page 1 [1]; FRC SCEW 1

(See Section 3 of this TER for Legend) R, T) QI) RT, P) H, CS, A) S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None, Not stated, Not applicable LISTING OF APPLICABLE CHECKSHEETS: Contents Checksheet Page No. Equipment Item la Summary of Licensee Responses to the NRC SER lb Equipment Environmental Qualification Summary Forms 2 3a, 30, 30, 30, 30 Licensee Response to NRC SER 46, 46, 4x, 4x, 4x, 4x, 4x System Consideration Review

> 36, 36, 36, 36, 36, 38, 36, 36, 31, 33

36, 36

74, 76, 76

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY:

Equipment Environmental Qualification Review

Installed TMI Lessons Learned Implementation Equipment Summary

Maintenance and Replacement Schedule Summary

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|---|---|
| QUIPME.IT ENVIRONMENTAL QUALIFIC | ATION REVIEW OF EQUIPMENT ITEM NO. |
| NUMMARY OF LICENSEE RESPONSES TO THE | NRC SER - ONLY CHECKED ITEMS ARE APPLICABLE |
| <u>X</u> The Licensee (has/h as not) provid | NRC SER - ONLY CHECKED ITEMS ARE APPLICABLE ed a response to the SER concerns. |

X The Licensee (has/has not) proposed a corrective action for this equipment item whose qualification has not been fully established.

Justification for interim operation (has/has not) been provided by the Licensee for this equipment item.

X Corrective action specified by the Licensee:

X Equipment replacement with qualified equipment

Equipment modification

Equipment relocation above submergence level

Relocate or shield equipment from radiation source

Verify qualification by additional (testing/analysis)

Equipment relocation to a mild environment

Qualification testing of equipment in progress

Other (

The Licensee has provided other information for this equipment item that can be construed as a basis for justification for interim operation.

X The Licensee (has/net not) provided a schedule for the proposed corrective action. (Schedule for accomplishing the corrective action June 30, 1982 .)

The Licensee states that the equipment item does not require qualification and/or should be exempted from environmental qualification.

DESIGNATION OF RESULTANT NRC QUALIFICATION EVALUATION CATEGORY BASED ON REVIEW - CIRCLED ITEM ONLY: (See Section 3 of this TER for Legend)

I.a Qualified (I.b) Modification II.a Qualification Not Established II.b Not Qualified

II.c Qualified Life Deficiency III.a Exempt III.b Not in Scope IV Documentation Not Available A Division of The Franklin Institute

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 1

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

| | DESIGNATION: |
|---|--------------------|
| NRC REQUIREMENTS | X = DEFICIENCY |
| Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Establi Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) | shed $\frac{X}{X}$ |
| o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate | × |
| Required Profile Enveloped Adequately Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied | <u>×</u> X |
| Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied | |
| Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied | |
| Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied | = |
| erretra wednested wardene pactories (norme proof ones at | |

DESIGNATION: X = CATEGORY

NRC QUALIFICATION CATEGORY

| Equipment Qualified | |
|---|---|
| Equipment Qualification Pending Modification | _X |
| Equipment Qualification Not Established | |
| Equipment Not Qualified | |
| Equipment Satisfies All Requirements Except Qualified Life or Replacement Schedule Justified | |
| Equipment Exempt From Qualification | |
| Equipment Not in the Scope of the Qualification Review | |
| Documentation Not Made Available | |
| | Equipment Qualified Equipment Qualification Pending Modification Equipment Qualification Not Established Equipment Not Qualified Equipment Satisfies All Requirements Except Qualified Life or Replacement Schedule Justified Equipment Exempt From Qualification Equipment Not in the Scope of the Qualification Review Documentation Not Made Available |

This equipment item was previously evaluated in Reference 59. See page 1A Equipment Item description.



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3a

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 1

LICENSEE RESPONSE TO NRC SER

Item 4.5.2.6 addresses solenoid valves in the turbine building. RG&E has committed to replace this equipment by June 30, 1982.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 2

Equipment Item No. 2 Solenoid Valves Located in Turbine Building (Area #7) Automatic Switch Co. (ASCO) Model LB8300B64RU Actuates Feedwater Bypass Valves (V-4271, V-4^72) Licensee Reference 1617 Required Operating Time: Short term (SI signal) TER Checksheet No. 2 Reference 59, Section 4.5.2.6 Licensee Submittal: Page 9 [62]; Table 3, Page 1 [1]; FRC SCEW 2

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend) R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None, Not stated, Not applicable LISTING OF APPLICABLE CHECKSHEETS:

Checksheet Page No.

| Equipment Item | la | | | | | |
|---|-------------|------------|------------|---------|-----|-----|
| Summary of Licensee Responses to the NRC SER | lb | | | | | |
| Equipment Environmental Qualification Summary Forms | 2 | | | | | |
| Licensee Response to NRC SER | 3a, | 36. | 36, | 36 | | |
| System Consideration Review | ¥á, | 40. | 45., | 44, | 44 | ₽£. |
| Equipment Environmental Qualification Review | 9×, 5×1, | 96, 56, | Š¢, SX, | ¥, ¥ | 58, | 5% |
| Installed TMI Lessons Learned Implementation Equipment Summary | ×. | 96 | | | | |
| Maintenance and Replacement Schedule Summary | 26. | 7,55, | 7,5 | | | |

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|---|--|-----------|
| QUIPMENT ENVIRONMENTAL QUALIFI | CATION REVIEW OF EQUIPMENT ITEM | NO. 2 |
| | | |
| SUMMARY CF LICENSEE RESPONSES TO THE | NRC SER - ONLY CHECKED ITEMS ARE API | PLICABL |
| X The Licensee (has/has not) provid | ded a response to the SER concerns. | |
| X The Licensee (http:/has not) speci- qualified and/or will function w environmental service conditions | fically stated that the equipment is hen exposed to the applicable DBE • | |
| The Licensee has presented informoutstanding qualification deficit | mation which shows there are no encies. | |
| X The Licensee (has/has Rot) propo item whose qualification has not | sed a corrective action for this equ been fully established. | ipment |
| Justification for interim op Licensee for this equipment | eration (has/has not) been provided item. | by the |
| \times Corrective action specified | by the Licensee: | |
| X Equipment replacement wi | th qualified equipment | |
| Equipment modification abo | ve submergence level | |
| Relocate or shield equip | ment from radiation source | |
| Verify qualification by | additional (testing/analysis) | |
| Equipment relocation to | a mild environment | |
| Other (| equipment in progress |) |
| The Licensee has provided ot that can be construed as a b operation. | ther information for this equipment in the sequipment is the sequence of the s | tem |
| X The Licensee (has/fas not) p corrective action. (Schedul action June 30,1982 | provided a schedule for the proposed le for accomplishing the corrective | .) |
| The Licensee states that the equal and/or should be exempted from e | ipment item does not require qualif | icatior |
| DESIGNATION OF PESULTANT NRC QUALIFY - CIRCLED ITEM ONLY: (See Section 3 | ICATION EVALUATION CATEGORY BASED ON 3 of this TER for Legend) | REVIEW |
| I.a Qualified (.b) Modification | II.c Qualified Life Deficiency III.a Exempt | |
| II.a Qualification Not Established | III.b Not in Scope | |
| | TV Documentation Not Ausilah | 10 |
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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 2

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

| | DESIGNATION: |
|--|---------------------|
| NRC_REQUIREMENTS | X = DEFICIENCY |
| Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Estable Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required Program Established to Identify Aging Degradation | ished $\frac{X}{X}$ |
| Criteria Regarding Aging Simulation Satisfied (If Required) | |
| Criteria Regarding Temperature/Pressure Exposure: | ~ |
| o Peak Temperature Adequate | |
| o Peak Pressure Adequate | <u></u> |
| o Duration Adequate | |
| o Required Profile Enveloped Adequately | _ <u>X_</u> |
| o Steam Exposure (If Required) Adequate | <u></u> |
| Criteria Regarding Spray Satisfied | |
| Criteria Regarding Submergence Satisfied | |
| Criteria Regarding Radiation Satisfied | |
| Criteria Regarding Test Sequence Satisfied | |
| Criteria Regarding Test Failures or Severe Anomalies | |
| (If Any) Satisfied | |
| Criteria Regarding Functional Testing Satisfied | |
| Criteria Regarding Instrument Accuracy Satisfied | |
| Test Duration Margin (1 hour + Function Time) Satisfied | |
| Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I) | |

DESIGNATION:

NRC QUALIFICATION CATEGORY

X = CATEGORY

| I.a | Equipment Qualified | - |
|-------|--|-----|
| I.b | Equipment Qualification Pending Modification | _X_ |
| II.a | Equipment Qualification Not Established | |
| II.b | Equipment Not Qualified | _ |
| II.c | Equipment Satisfies All Requirements Except Qualified Life | |
| | or Replacement Schedule Justified | |
| III.a | Equipment Exempt From Qualification | |
| III.D | Equipment Not in the Scope of the Qualification Review | |
| IV | Documentation Not Made Available | |

This equipment item was previously evaluated in Reference 59. See page 1A Equipment Item description.



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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 2

LICENSEE RESPONSE TO NRC SER

Item 4.5.2.6 addresses solenoid valves in the turbine building. RG&E has committed to replace this equipment by June 30, 1982.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 3

Equipment Item No. 3 Solenoid Valves Located in Auxiliary Building (Area #2) Copes-Vulcan Co. Model D-100-60 Actuates NaOH to CS Valves (AOV-836 A, B) Licensee Reference 1617 Required Operating Time: Short term (minutes) TER Checksheet No. 3 Reference 59, Section 4.7.5 Licensee Submittal: Table 3, Page 1 [1]; FRC SCEW 3

| (See Section 3 of this TER for Legend) | | | | | | |
|---|----------|-------------|-------|---------|-------|----|
| R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN | , SEN | 1, Q1 | , RE | PS, N | ione, | |
| Not stated, Not applicable - Deferred | | | | | | |
| LISTING OF APPLICABLE CHECKSHEETS: | | | | | | |
| Contents | Che | ckshe | eet I | Page | No. | |
| Equipment Item | la | | | | | |
| Summary of Licensee Responses to the NRC SER | lb | | | | | |
| Equipment Environmental Qualification Summary Forms | 2 | | | | | |
| Licensee Response to NRC SER | 36, | 356, | 36, | 38 | | |
| System Consideration Review | 40, | 46 , | æ, | £6, | æ, | 4€ |
| Equipment Environmental Qualification Review | %, %, | ж, * | ×, | ≫, % | ×, | × |
| Installed TMI Lessons Learned Implementation Equipment Summary | 9æ, | 96 | | | | |
| Maintenance and Replacement Schedule Summary | 7,6, | 7%, | 76 | | | |
| | | | | | | |

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY:

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|-----|---|
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| | |

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 3

SUMMARY OF LICENSEE RESPONSES TO THE NRC SER - ONLY CHECKED ITEMS ARE APPLICABLE: The Licensee (has/has not) provided a response to the SER concerns. The Licensee (has/has not) specifically stated that the equipment is qualified and/or will function when exposed to the applicable DBE environmental service conditions. The Licensee has presented information which shows there are no outstanding gualification deficiencies. The Licensee (has/has not) proposed a corrective action for this equipment item whose qualification has not been fully established. Justification for interim operation (has/has not) been provided by the Licensee for this equipment item. Corrective action specified by the Licensee: Equipment replacement with qualified equipment Equipment modification Equipment relocation above submergence level Relocate or shield equipment from radiation source Verify qualification by additional (testing/analysis) Equipment relocation to a mild environment Qualification testing of equipment in progress Other (The Licensee has provided other information for this equipment item that can be construed as a basis for justification for interim operation. The Licensee (has/has not) provided a schedule for the proposed corrective action. (Schedule for accomplishing the corrective action .) The Licensee states that the equipment item does not require qualification and/or should be exempted from environmental gualification. DESIGNATION OF RESULTANT NRC QUALIFICATION EVALUATION CATEGORY BASED ON REVIEW - CIRCLED ITEM ONLY: (See Section 3 of this TER for Legend) II.c Qualified Life Deficiency I.a Qualified I.b Modification III.a Exempt II.a Qualification Not Established (III.b) Not in Scope II.b Not Qualified IV Documentation Not Available

Franklin Research Center A Division of The Franklin Institute 20th and Race Streets, Phila., Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

Page 2

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 3

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

DESIGNATION: X = DEFICIENCY

NRC REQUIREMENTS

Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied

Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

DESIGNATION: X = CATEGORY

X = CATEGORY

| I.a | Equipment Qualified | |
|-------|---|-----|
| I.b | Equipment Qualification Pending Modification | |
| II.a | Equipment Qualification Not Established | |
| II.b | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life or Replacement Schedule Justified | |
| III.a | Equipment Exempt From Qualification | |
| III.b | Equipment Not in the Scope of the Qualification Review | _X_ |
| IV | Documentation Not Made Available | |

MILD ENVIRONMENT

NRC QUALIFICATION CATEGORY



NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 4

Equipment Item No. 4 Solenoid Valves Located in Intermediate Building (Area #3) Lawrence Co. Model 110114W Actuates Main Steam Isolation Valves - Supply Side (V-3516) Licensee Reference 18 Required Operating Time: Very short (seconds) TER Checksheet No. 4 Reference 59, Section 4.5.2.10 Licensee Submittal: Page 10 [62]; Table 3, Page 1 [1]; FRC SCEW 4

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

R, T T, RT, P, H, CS, A, S, (R), M, I, M, RPN, EXN, SEN, QI, RPS, None,

Not stated, Not applicable

LISTING OF APPLICABLE CHECKSHEETS:

Checksheet Page No. Contents Equipment Item la Summary of Licensee Responses to the NRC SER 1b Equipment Environmental Qualification Summary Forms 2 3a, 30, 36, 36 Licensee Response to NRC SER 秘, 秘, 张, 秘, 张, 铁 System Consideration Review 统, %, 米, %, %, 关, 沃, Equipment Environmental Qualification Review 54, 30, 34, 33 64, 66 Installed TMI Lessons Learned Implementation Equipment Summary 71, 76, 76 Maintenance and Replacement Schedule Summary

20th and Race Streets, Phila ., Pa 19103 (215) 448-1000

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| EQUIPMENT ENVIRONMENTAL C | QUALIFICATION | REVIEW OF | EQUIPMENT | ITEM NO | 4 |
|---------------------------|---------------|-----------|-----------|---------|---|
|---------------------------|---------------|-----------|-----------|---------|---|

SUMMARY OF LICENSEE RESPONSES TO THE NRC SER - ONLY CHECKED ITEMS ARE APPLICABLE:

- X The Licensee (has/has not) provided a response to the SER concerns.
- X The Licensee (has not) specifically stated that the equipment is qualified and/or will function when exposed to the applicable DBE environmental service conditions.
- The Licensee has presented information which shows there are no outstanding qualification deficiencies.
- X The Licensee (has/has not) proposed a corrective action for this equipment item whose qualification has not been fully established.
 - Justification for interim operation (has/has not) been provided by the Licensee for this equipment item.
 - X Corrective action specified by the Licensee:
 - X Equipment replacement with qualified equipment
 - Equipment modification
 - Equipment relocation above submergence level
 - Relocate or shield equipment from radiation source
 - Verify qualification by additional (testing/analysis)
 - Equipment relocation to a mild environment
 - Qualification testing of equipment in progress
 - Other (
 - The Licensee has provided other information for this equipment item that can be construed as a basis for justification for interim operation.
 - X The Licensee (has/nas not) provided a schedule for the proposed corrective action. (Schedule for accomplishing the corrective action June 30, 1982
- The Licensee states that the equipment item does not require qualification and/or should be exempted from environmental gualification.

DESIGNATION OF RESULTANT NRC QUALIFICATION EVALUATION CATEGORY BASED ON REVIEW - CIRCLED ITEM ONLY: (See Section 3 of this TER for Legend)

I.a Qualified (I.b) Modification II.a Qualification Not Established III.b Not in Scope II.b Not Qualified

3

II.c Qualified Life Deficiency III.a Exempt IV Documentation Not Available A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

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DESIGNATION: X = DEFICIENCY

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 4

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

NRC REQUIREMENTS

Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied

Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

NRC QUALIFICATION CATEGORY

DESIGNATION: X = CATEGORY

| I.a | Equipment Qualified | |
|-------|--|------------|
| I.b | Equipment Qualification Pending Modification | _ <u>×</u> |
| II.a | Equipment Qualification Not Established | |
| II.b | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life | |
| | or Replacement Schedule Justified | |
| III.a | Equipment Exempt From Qualification | |
| III.D | Equipment Not in the Scope of the Qualification Review | |
| IV | Documentation Not Made Available | |
| | | |

This equipment item was previously evaluated in Reference 59. See page 1A Equipment Item description.

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Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila., Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 4

LICENSEE RESPONSE TO NRC SER

Item 4.5.2.10 addresses solenoid valves for the main steam isolation valves. RG&E has committed to replace these valves by June 30, 1982.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 5

Equipment Item No. 5 Solenoid Valves Located in Intermediate Building (Area #3) Lawrence Co. Model 125434W Actuates Main Steam Isolation Valves - Vent Side (V-3517) Licensee Reference 18 Required Operating Time: Very short (seconds) TER Checksheet No. 5 Reference 59, Section 4.5.2.10 Licensee Submittal: Page 10 [62]; Table 3, Page 1 [1]; FRC SCEW 5

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

Not stated, Not applicable

LISTING OF APPLICABLE CHECKSHEETS:

Contents

Checksheet Page No.

始, 级, 长, 始, 狭, 狭

5a, 5b, 5c, 3d, 9e, Xt,

3a, 36, 36, 36, 3d

54, 36, 36, 36

la

1b

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Equipment Item

Summary of Licensee Responses to the NRC SER Equipment Environmental Qualification Summary Forms Licensee Response to NRC SER System Consideration Review Equipment Environmental Qualification Review

Installed TMI Lessons Learned Implementation Equipment Summary

Maintenance and Replacement Schedule Summary

7×, 75, 76;

64, 00

| 0000 | Franklin Research Center |
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| | 20th and Race Streets, Phila, Pa 19103 (215) 448-1000 |

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 5 SUMMARY OF LICENSEE RESPONSES TO THE NRC SER - ONLY CHECKED ITEMS ARE APPLICABLE: X The Licensee (has/bas not) provided a response to the SER concerns. X The Licensee (has not) specifically stated that the equipment is qualified and/or will function when exposed to the applicable DBE environmental service conditions. The Licensee has presented information which shows there are no outstanding qualification deficiencies. X The Licensee (has/has not) proposed a corrective action for this equipment item whose qualification has not been fully established. Justification for interim operation (has/has not) been provided by the Licensee for this equipment item. X Corrective action specified by the Licensee: X Equipment replacement with qualified equipment Equipment modification Equipment relocation above submergence level Relocate or shield equipment from radiation source Verify qualification by additional (testing/analysis) ____ Equipment relocation to a mild environment Qualification testing of equipment in progress Other (The Licensee has provided other information for this equipment item that can be construed as a basis for justification for interim operation. X The Licensee (has/tas not) provided a schedule for the proposed corrective action. (Schedule for accomplishing the corrective action June 30, 1982 _.) The Licensee states that the equipment item does not require qualification and/or should be exempted from environmental qualification. DESIGNATION OF RESULTANT NRC QUALIFICATION EVALUATION CATEGORY BASED ON REVIEW - CIRCLED ITEM ONLY: (See Section 3 of this TER for Legend) II.c Qualified Life Deficiency I.a Qualified (1.b) Modification III.a Exempt II.a Qualification Not Established III.b Not in Scope IV Documentation Not Available II.b Not Qualified

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Page

DESIGNATION:

2

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 5

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

| NRC REQUIREMENTS | $\underline{\mathbf{X}} = \text{DEFICIENCY}$ |
|--|--|
| Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen E Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Re Program Established to Identify Aging Degradation | equired) |
| Criteria Regarding Aging Simulation Satisfied (If Require | |
| Criteria Regarding Temperature/Pressure Exposure: | ~ |
| o Peak Temperature Adequate | × |
| o Peak Pressure Adequate | × |
| o Required Profile Enveloped Adequately | × |
| o Steam Exposure (If Required) Adequate | × |
| Criteria Regarding Spray Satisfied | |
| Criteria Regarding Submergence Satisfied | |
| Criteria Regarding Radiation Satisfied | |
| Criteria Regarding Test Sequence Satisfied | |
| Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied | |
| Criteria Regarding Functional Testing Satisfied | |
| Criteria Regarding Instrument Accuracy Satisfied | |
| Test Duration Margin (1 hour + Function Time) Satisfied | |
| Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I) | |

NRC QUALIFICATION CATEGORY

DESIGNATION: X = CATEGORY

Equipment Qualified I.a Equipment Qualification Pending Modification X I.b _____ Equipment Qualification Not Established II.a Equipment Not Qualified II.D Equipment Satisfies All Requirements Except Qualified Life II.C or Replacement Schedule Justified III.a Equipment Exempt From Qualification III.p Equipment Not in the Scope of the Qualification Review Documentation Not Made Available IV

This equipment item was previously evaluated in Reference 59. See page 1A Equipment Item description.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 5

LICENSEE RESPONSE TO NRC SER

Item 4.5.2.10 addresses solenoid values for the main steam isolation values. RG&E has committed to replace these values by June 30, 1982.



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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 6

Equipment Item No. 6 Solenoid Valves Located Inside Containment (Area #1) Versa Valve Co. Model VSG Actuates Containment Recirculation System Dampers (V-5871 through V-5876) Licensee Reference 19 Required Operating Time: Very short (seconds) TER Checksheet No. 6 Reference 59, Section 4.5.2.11 Licensee Submittal: Page 10 [62]; Table 3, Page 1 [1]; FRC SCEW 6

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend) R, (T, QT), RT, (P), H, CS, (A), S, (R), M, I, (QM), RPN, EXN, SEN, (QI), RPS, None,

Not stated, Not applicable

LISTING OF APPLICABLE CHECKSHEETS:

Checksheet Page No. Contents la Equipment Item 16 Summary of Licensee Responses to the NRC SER Equipment Environmental Qualification Summary Forms 2 Licensee Response to NRC SER 3a, 35, 35, 38, 3d 4a, 40, 4c, 4d, 4a, 4t System Consideration Review 9x, 9k, 5x, 3x, 9x, 9x, Equipment Environmental Qualification Review \$\$, \$X, \$X, \$X 64, 60 Installed TMI Lessons Learned Implementation Equipment Summary 76, 20, 30 Maintenance and Replacement Schedule Summary

| A Division of The Franklin Institute - 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 | NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u> | | | | | | | | | | |
|---|---|---------|--|--|--|--|--|--|--|--|--|
| EQUIPMENT ENVIRONMENTAL QUALIFIC | ATION REVIEW OF EQUIPMENT ITEM N | 10. 6 | | | | | | | | | |
| | | | | | | | | | | | |
| SUMMARY OF LICENSEE RESPONSES TO THE N | NRC SER - ONLY CHECKED ITEMS ARE APPI | ICABLE: | | | | | | | | | |
| X The Licensee (has/has-hat) provide | ed a response to the SER concerns. | | | | | | | | | | |
| X The Licensee (Has/has not) specifi qualified and/or will function whe environmental service conditions. | cally stated that the equipment is en exposed to the applicable DBE | | | | | | | | | | |
| The Licensee has presented informa outstanding qualification deficier | ation which shows there are no ncies | | | | | | | | | | |
| X The Licensee (has/has not) propose item whose qualification has not b | ed a corrective action for this equip been fully established. | ment | | | | | | | | | |
| Justification for interim oper Licensee for this equipment it | ation (has/has not) been provided by em. | the | | | | | | | | | |
| \underline{X} Corrective action specified by | the Licensee: | | | | | | | | | | |
| Equipment replacement with qualified equipment Equipment modification Equipment relocation above submergence level Relocate or shield equipment from radiation source Verify qualification by additional (testing/analysis) Equipment relocation to a mild environment | | | | | | | | | | | |
| Other (| |) | | | | | | | | | |
| The Licensee has provided other that can be construed as a bas operation. | er information for this equipment ite sis for justification for interim | m | | | | | | | | | |
| X The Licensee (has/tas not) pro corrective action. (Schedule action June 30, 1982 | ovided a schedule for the proposed for accomplishing the corrective .) | | | | | | | | | | |
| The Licensee states that the equip and/or should be exempted from env | oment item does not require qualification. | tion | | | | | | | | | |
| DESIGNATION OF RESULTANT NRC QUALIFICA - CIRCLED ITEM ONLY: (See Section 3 of | ATION EVALUATION CATEGORY BASED ON RE of this TER for Legend) | VIEW | | | | | | | | | |
| I.a Qualified I.D Modification II.a Qualification Not Established II.b Not Qualified | II.c Qualified Life Deficiency III.a Exempt III.b Not in Scope IV Documentation Not Available | | | | | | | | | | |

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NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 6

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

DESIGNATION: X = DEFICIENCY

NRC REQUIREMENTS

Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

NRC QUALIFICATION CATEGORY

DESIGNATION: X = CATEGORY

| I.a | Equipment Qualified | |
|-------|--|----|
| I.b | Equipment Qualification Pending Modification | _X |
| II.a | Equipment Qualification Not Established | |
| II.b | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life | |
| | or Replacement Schedule Justified | |
| III.a | Equipment Exempt From Qualification | |
| III.b | Equipment Not in the Scope of the Qualification Review | |
| IV | Documentation Not Made Available | |

This equipment item was previously evaluated in Reference 59. See page 1A Equipment Item description.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 6

LICENSEE RESPONSE TO NRC SER

Item 4.5.2.11 addresses solenoid valves for the containment recirculation system dampers. RG&E has committed to replace these solenoid valves by June 30, 1982.



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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO.

Equipment Item No. 7 Solenoid Valves Located in Auxiliary Building (Area #2) Automatic Switch Co. (ASCO), Model Not Stated Actuates SI Recirculation Valves (AOV-897, 898) Licensee Reference 1617 Required Operating Time: Short term (before sump recirculation) TER Checksheet No. 7 Reference 59, Section 4.7.4 Licensee Submittal: Table 3, Page 2 [1]; FRC SCEW 7

| DES | SIG | NATIO | NI | 10 | RD | EFIC | IE | NCY | IDE | NTIF | IED | BY | THE | NRC | SER · | - CIRC | LED | ITEM (| S) ONL | Y: |
|-----|-----|-------|----|----|----|------|----|-----|-----|------|------|----|-----|------|-------|--------|-----|--------|--------|----|
| (Se | e | Secti | on | 3 | of | thi | s | TER | for | Leg | end) |) | | | | | | | | |
| R, | т, | gr, | RT | | Ρ, | н, с | s, | Α, | s, | (R), | м, | I, | QM, | RPN, | EXN | , SEN, | QI, | RPS, | None, | |

Not stated, Not applicable Deferred LISTING OF APPLICABLE CHECKSHEETS:

Contents

Checksheet Page No.

| Equipment Item | la | | | | |
|---|--------------------|-----|-----------|--------------|-----------------|
| Summary of Licensee Responses to the NRC SER | lb | | | | |
| Equipment Environmental Qualification Summary Forms | 2 | | | | |
| Licensee Response to NRC SER | 32, 38, | 36, | 30 | | |
| System Consideration Review | 44, 40, | 48, | 40, | 4×, | * |
| Equipment Environmental Qualification Review | 5, 5, 5, 5, 30, | SX. | sa, sz | 9 % , | 3 6, |
| Installed TMI Lessons Learned Implementation Equipment Summary | 634, 635 | | | | |
| Maintenance and Replacement Schedule Summary | 34, 26, | 7% | | | |

| 000 | Franklin Research | Cent | er | | | | | |
|-----|--------------------------|---------|--------|-------|-------|------|------|--|
| | A Division of The Frank | lin Ins | tituti | e | | | | |
| | 20th and Race Streets. I | Phila. | Pa | 19103 | (215) | 448- | 1000 | |

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. _Z

| UMM | ARY OF LICENSEE RESPONSES TO THE NRC SER - ONLY CHECKED ITEMS ARE APPLICABLE |
|---------------|---|
| _ | The Licensee (has/has not) provided a response to the SER concerns. |
| | The Licensee (has/has not) specifically stated that the equipment is qualified and/or will function when exposed to the applicable DBE environmental service conditions. |
| | The Licensee has presented information which shows there are no outstanding qualification deficiencies. |
| - 1 | The Licensee (has/has not) proposed a corrective action for this equipment item whose qualification has not been fully established. |
| | Justification for interim operation (has/has not) been provided by the Licensee for this equipment item. |
| | Corrective action specified by the Licensee: |
| | Equipment replacement with qualified equipment Equipment modification Equipment relocation above submergence level Relocate or shield equipment from radiation source Verify qualification by additional (testing/analysis) Equipment relocation to a mild environment Qualification testing of equipment in progress |
| | <pre></pre> |
| | action) |
| | The Licensee states that the equipment item does not require qualification and/or should be exempted from environmental qualification. |
| CIN | NATION OF RESULTANT NRC QUALIFICATION EVALUATION CATEGORY BASED ON REVIEW RCLED ITEM ONLY: (See Section 3 of this TER for Legend) |
| a b L.a | Qualified II.c Qualified Life Deficiency Modification Qualification Not Established III.b Not in Scope |
| A 100 PT | NOT ANALITICA IN POCULIENCETON NOT WAITEDIE |

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NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 7

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

NRC REQUIREMENTS

DESIGNATION: X = DEFICIENCY

DESIGNATION:

| Documented Evidence of Qualification Adequate |
|---|
| Adequate Similarity Between Equipment and Test Specimen Established |
| Aging Degradation Evaluated Adequately |
| Qualified Life or Replacement Schedule Established (If Required) |
| Program Established to Identify Aging Degradation |
| Criteria Regarding Aging Simulation Satisfied (If Required) |
| Criteria Regarding Temperature/Pressure Exposure: |
| o Peak Temperature Adequate |
| o Peak Pressure Adequate |
| o Duration Adequate |
| o Required Profile Enveloped Adequately |
| o Steam Exposure (If Required) Adequate |
| Criteria Regarding Spray Satisfied |
| Criteria Regarding Submergence Satisfied |
| Criteria Regarding Radiation Satisfied |
| Criteria Regarding Test Sequence Satisfied |
| Criteria Regarding Test Failures or Severe Anomalies |
| (If Any) Satisfied |
| Criteria Regarding Functional Testing Satisfied |
| Criteria Regarding Instrument Accuracy Satisfied |
| Test Duration Margin (1 hour + Function Time) Satisfied |
| Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I) |
| |

NRC QUALIFICATION CATEGORY

X = CATEGORYI.a Equipment Qualified Equipment Qualification Pending Modification I.b II.a Equipment Qualification Not Established _____ II.b Equipment Not Qualified II.c Equipment Satisfies All Requirements Except Qualified Life or Replacement Schedule Justified III.a Equipment Exempt From Qualification III.D Equipment Not in the Scope of the Qualification Review Documentation Not Made Available IV

MILD ENVIRONMENT

2

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 8

Equipment Item No. 8 Solenoid Valves Located Inside Containment (Area #1) Versa Valve Co. Model VSG-3731 Actuates Containment Purge Valves (Plant ID Not Stated) Licensee Reference 19 Required Operating Time: Seconds TER Checksheet No. 8 Reference 59, Section 4.6.9 Licensee Submittal: Page 13 [62]; Table 3, Page 2 [1]; FRC SCEW 8

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

(R) (T, QT, RT, P, H, CS, A) S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

Not stated, Not applicable

LISTING OF APPLICABLE CHECKSHEETS:

| Contents Checksheet Page No | | No. | | | | |
|---|-------------|--------------|----------|---------|------------|----|
| Equipment Item | la | | | | | |
| Summary of Licensee Responses to the NRC SER | sb | | | | | |
| Equipment Environmental Qualification Summary Forma | 3 | | | | | |
| Licensee Response to NRC SER | 3a, | 3 X , | 36, | 36 | | |
| System Consideration Review | 44 , | 40, | 4. | 40, | æ, | 44 |
| Equipment Environmental Qualification Review | 96, 94, | 5%, 36, | ×, ×, | 荣, 教 | % , | ×, |
| Installed TMI Lessons Learned Implementation Equipment Summary | ¢4, | % | | | | |
| Maintenance and Replacement Schedule Summary | 74. | 76. | 74 | | | |

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Page 1b

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO.

SUMMARY OF LICENSEE RESPONSES TO THE NRC SER - ONLY CHECKED ITEMS ARE APPLICABLE: X The Licensee (has/has not) provided a response to the SER concerns. X The Licensee (Has not) specifically stated that the equipment is qualified and/or will function when exposed to the applicable DBE environmental service conditions. The Licensee has presented information which shows there are no outstanding qualification deficiencies. X The Licensee (has/has mut) proposed a corrective action for this equipment item whose gualification has not been fully established. Justification for interim operation (has/has not) been provided by the Licensee for this equipment item. X Corrective action specified by the Licensee: X Equipment replacement with qualified equipment Equipment modification Equipment relocation above submergence level Relocate or shield equipment from radiation source Verify qualification by addition. 1 (testing/analysis) Equipment relocation to a mild environment ____ Qualification testing of equipment in progress Other (The Licensee has provided other information for this equipment item that can be construed as a basis for justification for interim operation. X The Licensee (has/has not) provided a schedule for the proposed corrective action. (Schedule for accomplishing the corrective action June 30, 1982 The Licensee states that the equipment item does not require qualification and/or should be exempted from environmental gualification. DESIGNATION F RESULTANT NRC QUALIFICATION EVALUATION CATEGORY BASED ON REVIEW - CIRCLED TAM ONLY: (See Section 3 of this TER for Legend) I.a Qualified (I.b) Modification II.c Qualified Life Deficiency III.a Exempt II.a Qualification Not Established III.b Not in Scope IV Documentation Not Available II.b Not Qualified

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 2

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

| NRC REQUIREMENTS X = | IGNATION: DEFICIENCY |
|--|-------------------------|
| Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately | × |
| Qualified Life or Replacement Schedule Established (If Required) | |
| Criteria Regarding Aging Simulation Satisfied (If Required) | |
| Criteria Regarding Temperature/Pressure Exposure: | |
| o Peak Temperature Adequate | X |
| o Peak Pressure Adequate | _ <u>×</u> _ |
| o Duration Adequate | <u>×</u> |
| o Required Profile Enveloped Adequately | ~ |
| O Steam Exposure (II Required) Adequate | × |
| Criteria Regarding Submergence Satisfied | |
| Criteria Regarding Radiation Satisfied | X |
| Criteria Regarding Test Sequence Satisfied | |
| Criteria Regarding Test Failures or Severe Anomalies | |
| (If Any) Satisfied | |
| Criteria Regarding Functional Testing Satisfied | |
| Test Duration Margin (1 hour + Function Time) Satisfied | |
| Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I) | |

DESIGNATION:

NRC QUALIFICATION CATEGORY

X = CATEGORY

| I.a | Equipment Qualified | |
|-------|--|-----|
| I.b | Equipment Qualification Pending Modification | - X |
| II.a | Equipment Qualification Not Established | |
| II.b | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life | |
| | Provident Branch Branch Colification | |
| 111.a | Equipment Exempt from Qualification | |
| III.b | Equipment Not in the Scope of the Qualification Review | - |
| VI | Documentation Not Made Available | |

This equipment item was previously evaluated in Reference 59. See page 1A Equipment Item description.

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Page 3a

3

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 8

LICENSEE RESPONSE TO NRC SER

Item 4.6.9 addresses the purge and depressurization valve solenoid valves. As previously stated, RG&E has committed to replace these solenoid valves by June 30, 1982.

Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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Page

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 9

Equipment Item No. 9 Solenoid Valves Located Inside Containment (Area #1) Versa Valve Co. Model VSG-3421 Actuates Containment Depressurization Valves (Plant ID Not Stated) Licensee Reference 19 Required Operating Time: Seconds TER Checksheet No. 9 Reference 59, Section 4.6.9 Licensee Submittal: Page 13 [62]; Table 3, Page 2 [1]; FRC SCEW 9

(See Section 3 of this TER for Legend) R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM RPN, EXN, SEN, QI, RPS, None, Not stated, Not applicable LISTING OF APPLICABLE CHECKSHEETS: Contents Checksheet Page No. Equipment Item la Summary of Licensee Responses to the NRC SER lb Equipment Environmental Qualification Summary Forms 2 3a, 36, 36, 36, 36 Licensee Response to NRC SER 45, 46, 46, 46, 44, 46 System Consideration Review Equipment Environmental Qualification Review 54, 54, 56, 58, 56, 5€, 59, 30, 54, 30 Installed TMI Lessons Learned Implementation 54, 90 Equipment Summary 7/2, 7/2, TK Maintenance and Replacement Schedule Summary

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DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY:

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 9

| SUMMARY OF LICENSEE RESPONSES TO THE NRC | C SER - ONLY CHECKED ITEMS ARE APPLICABLE |
|---|---|
| X The Licensee (has/hes and) provided | a response to the SER concerns. |
| X The Licensee (mas/has not) specifica qualified and/or will function when environmental service conditions. | ally stated that the equipment is exposed to the applicable DBE |
| The Licensee has presented informat: outstanding qualification deficienc: | ion which shows there are no ies. |
| X The Licensee (has/has not) proposed item whose qualification has not been been been been been been been bee | a corrective action for this equipment en fully established. |
| Justification for interim operate Licensee for this equipment iter | tion (has/has not) been provided by the m. |
| X Corrective action specified by | the Licensee: |
| Equipment replacement with a Equipment modification Equipment relocation above a Relocate or shield equipmen Verify qualification by add Equipment relocation to a m Qualification testing of eq Other (| <pre>qualified equipment submergence level t from radiation source itional (testing/analysis) ild environment uipment in progress)</pre> |
| The Licensee has provided other that can be construed as a basi operation. | information for this equipment item s for justification for interim |
| The Licensee (has/has not) prov corrective action. (Schedule f action June 30,1982 | ided a schedule for the proposed or accomplishing the corrective |
| — The Licensee states that the equipm and/or should be exempted from envi | ent item does not require qualification ronmental qualification. |
| DESIGNATION OF RESULTANT NRC QUALIFICAT - CIRCLED ITEM ONLY: (See Section 3 of | TION EVALUATION CATEGORY BASED ON REVIEW this TER for Legend) |
| I.a Qualified (I.b) Modification II.a Qualification Not Established II.b Not Qualified | II.c Qualified Life Deficiency III.a Exempt III.b Not in Scope IV Documentation Not Available |
| | |

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 9

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

| NRC REQUIREMENTS | DESIGNATION: = DEFICIENCY |
|--|------------------------------|
| Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Establis | shed |
| Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) | _ <u>×</u> |
| Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: | |
| Peak Temperature Adequate Peak Pressure Adequate | _ <u>×_</u> |
| Duration Adequate Required Profile Enveloped Adequately Steam Exposure (If Required) Adequate | X |
| Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied | X |
| Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies | |
| (If Any) Satisfied Criteria Regarding Functional Testing Satisfied | |
| Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I) | |

DESIGNATION: X = CATEGORY

NRC QUALIFICATION CATEGORY

This equipment item was _____viously evaluated in Reference 59. See page 1A Equipment Item description.



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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO.

LICENSEE RESPONSE TO NRC SER

Item 4.6.9 addresses the purge and depressurization valve solenoid valves. As previously stated, RG&E has committed to replace these solenoid valves by June 30, 1982.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 10

Equipment Item No. 10 Solenoid Valves Located Inside Containment (Area #1) Valcor Engineering Corp. Model V57300 Pressurizer PORVs (Plant ID Not Stated) Licensee References 1547, 1568, 1569, 1801, 1835, 2796, 2797, 2798, 2799, 2800, and 2801 Required Operating Time: Long term TER Checksheet No. 10 Reference 59, Section 4.6.12 Licensee Submittal: Page 15 [62]; Table 3, Page 10 [1]; FRC SCEW 62

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend) (E) (T) (A) RT, (P) H, (S) (A) S, (R), M, I, (M) RPN, EXN, SEN, (I) RPS, None, Not stated, Not applicable

LISTING OF APPLICABLE CHECKSHEETS:

| Contents | Chec | ckshe | eet 1 | Page | No. | |
|---|------------|------------|------------|------|-----|-----|
| Equipment Item | la | | | | | |
| Summary of Licensee Responses to the NRC SER | 16 | | | | | |
| Equipment Environmental Qualification Summary Forms | 2 | | | | | |
| Licensee Response to NRC SER | 3a, | 36. | 34, | 334 | | |
| System Consideration Review | 46. | 4%, | * | 46., | 44, | 4€ |
| Equipment Environmental Qualification Review | 5a, 5%, | 50, 5%, | 5c, 54, | 5d, | 5e, | 5f, |
| Installed TMI Lessons Learned Implementation Equipment Summary | 634, | 646 | | | | |
| Maintenance and Replacement Schedule Summary | 26. | 200, | 26 | | | |

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO 10

| The Licensee (has/hes not) provid | ded a response to the SER concerns. |
|---|--|
| The Licensee (has/has not) speci- qualified and/or will function w environmental service conditions | fically stated that the equipment is hen exposed to the applicable DBE |
| The Licensee has presented informoutstanding qualification deficient | mation which shows there are no encies. |
| The Licensee (has/has not) propo item whose qualification has not | sed a corrective action for this equipment been fully established. |
| Justification for interim op Licensee for this equipment | eration (has/has not) been provided by the item. |
| Corrective action specified | by the Licensee: |
| Equipment replacement wi Equipment modification Equipment relocation abo Relocate or shield equip Verify qualification by Equipment relocation to Qualification testing of Other (| ve submergence level ment from radiation source additional (testing/analysis) a mild environment equipment in progress |
| The Licensee has provided ot that can be construed as a b operation. | ther information for this equipment item basis for justification for interim |
| The Licensee (has/has not) p corrective action. (Schedul action | provided a schedule for the proposed le for accomplishing the corrective .) |
| The Licensee states that the equal and/or should be exempted from e | ipment item does not require qualification environmental qualification. |
| ESIGNATION OF RESULTANT NRC QUALIFI CIRCLED ITEM ONLY: (See Section 3 | ICATION EVALUATION CATEGORY BASED ON REVIEW 3 of this TER for Legend) |
| .a Qualified .b Modification | II.c Qualified Life Deficiency III.a Exempt |

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 10

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

DESIGNATION: X = DEFICIENCY

NRC REQUIREMENTS

NRC QUALIFICATION CATEGORY

| Documented Evidence of Qualification Adequate | |
|---|--|
| Adoguate Similarity Between Equipment and Test Specimen Established | × |
| Adequate Similarity between Equipment and root operation and the | |
| Aging Degradation Evaluated Adequately | |
| Qualified Life of Replacement Schedule Established (if Required) | and a standard sector of the s |
| Program Established to Identify Aging Degradation | |
| Criteria Regarding Aging Simulation Satisfied (If Required) | |
| Criteria Regarding Temperature/Pressure Exposure: | |
| o Peak Temperature Adequate | |
| o Peak Pressure Adequate | |
| o Duration Adequate | |
| o Required Profile Enveloped Adequately | |
| o Steam Exposure (If Required) Adequate | |
| Criteria Regarding Spray Satisfied | |
| Criteria Regarding Submergence Satisfied | |
| Criteria Regarding Radiation Satisfied | |
| Criteria Regarding Test Sequence Satisfied | |
| Criteria Regarding Test Failures or Severe Anomalies | |
| (If Any) Satisfied | |
| Criteria Regarding Functional Testing Satisfied | |
| Criteria Regarding Instrument Accuracy Satisfied | |
| Test Duration Margin (1 hour + Function Time) Satisfied | |
| Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I) | |

DESIGNATION: X = CATECORY

Equipment Qualified I.a Equipment Qualification Pending Modification I.b _X____ II.a Equipment Qualification Not Established II.b Equipment Not Qualified Equipment Satisfies All Requirements Except Qualified Life II.C or Replacement Schedule Justified III.a Equipment Exempt From Qualification III.b Equipment Not in the Scope of the Qualification Review Documentation Not Made Available IV

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 10

LICENSEE RESPONSE TO NRC SER

Item 4.6.12 addresses the solenoid values for the pressurizer PORV's. The original specification provided as Reference 2.48 provided information relative to the environmental qualfication of these values; the test report is not at this time available to RG&E. This will be obtained prior to June 30, 1982, to provide confirmation of the environmental qualification of these solenoid values. The September 24, 1980 information is withdrawn as a reference for our submittal; it was incorrectly submitted. A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 10

Checksheets 5a three 5f have been removed due to the

proprietary nature of information contained therein.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 1/

Equipment Item No. 11 Solenoid Valves Located in Basement of Control Building (Area #8) Johnson Controls Model D251 Actuation of Control Room Air Handling Unit Dampers (Plant ID Not Stated) Licensee reference not cited Required Operating Time: Short term TER Checksheet No. 11 Reference 59, Section 4.7.17 Licensee Submittal: Table 3, Page 11 [1]; FRC SCEW 67

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

Not stated, Not applicable DEFERRED LISTING OF APPLICABLE CHECKSHEETS:

Contents Checksheet Page No. Equipment Item la Summary of Licensee Responses to the NRC SER 1b Equipment Environmental Qualification Summary Forms 2 36, 30, 36, 30 Licensee Response to NRC SER \$4, \$5, \$6, \$6, 48, \$5 System Consideration Review 34, 310, 56, 58, 54, 54, Equipment Environmental Qualification Review 39, 36, 54, 39 Installed TMI Lessons Learned Implementation 64, 66 Equipment Summary Maintenance and Replacement Schedule Summary 74, 76, 78

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 11

SUMMARY OF LICENSEE RESPONSES TO THE NRC SER - ONLY CHECKED ITEMS ARE APPLICABLE:

- The Licensee (has/has not) provided a response to the SER concerns.
- The Licensee (has/has not) specifically stated that the equipment is qualified and/or will function when exposed to the applicable DBE environmental service conditions.
- The Licensee has presented information which shows there are no outstanding qualification deficiencies.
- The Licensee (has/has not) proposed a corrective action for this equipment item wrose qualification has not been fully established.
 - _____ Justification for interim operation (has/has not) been provided by the Licensee for this equipment item.
 - Corrective action specified by the Licensee:
 - Equipment replacement with qualified equipment
 - Equipment modification
 - Equipment relocation above submergence level
 - ____ Relocate or shield equipment from radiation source
 - ____ Verify qualification by additional (testing/analysis)
 - Equipment relocation to a mild environment
 - ____Qualification testing of equipment in progress
 - Other (
 - The Licensee has provided other information for this equipment item that can be construed as a basis for justification for interim operation.
 - The Licensee (has/has not) provided a schedule for the proposed corrective action. (Schedule for accomplishing the corrective action
 - ____ The Licensee states that the equipment item does not require qualification and/or should be exempted from environmental qualification.

DESIGNATION OF RESULTANT NRC QUALIFICATION EVALUATION CATEGORY BASED ON REVIEW - CIRCLED ITEM ONLY: (See Section 3 of this TER for Legend)

I.a Qualified I.b Modification II.a Qualification Not Established II.b Not Qualified II.c Qualified Life Deficiency III.a Exempt (III.b) Not in Scope IV Documentation Not Available

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 11 EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM DESIGNATION: X = DEFICIENCY NRC REQUIREMENTS Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I) DESIGNATION:

NRC QUALIFICATION CATEGORY

X = CATEGORY

4.

8.

Equipment Qualified I.a Equipment Qualification Pending Modification I.b II.a Equipment Qualification Not Established II.b Equipment Not Qualified Equipment Satisfies All Requirements Except Qualified Life II.c or Replacement Schedule Justified III.a Equipment Exempt From Qualification III.b Equipment Not in the Scope of the Qualification Review Documentation Not Made Available IV

MILD ENVIRONMENT
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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 12

Equipment Item No. 12 Motorized Valve Actuators Located Inside Containment (Area #1) Limitorque Model SMB-2 with Reliance Electric Co. Motor Operates Accumulator Discharge Valve (MOV-841, 865) Licensee References 26, 637, and 639 Required Operating Time: Not required to operate TER Checksheet No. 12 Reference 59, Section 4.4.1 Licensee Submittal: Page 7 [62]; Table 3, Page 2 [1]; FRC SCEW 10

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

(Not stated) Not applicable

LISTING OF APPLICABLE CHECKSHEETS:

| Contents | Chec | kshe | et I | Page | No. | |
|---|------|------------|------|------|-----|----|
| Equipment Item | la | | | | | |
| Summary of Licensee Responses to the NRC SER | lb | | | | | |
| Equipment Environmental Qualification Summary Forms | 2 | | | | | |
| Licensee Response to NRC SER | 3a, | 36. | 30, | 38 | | |
| System Consideration Review | 44, | 4Q, | * | ₩, | 雂, | 4€ |
| Equipment Environmental Qualification Review | M. | 90, 96, | ** | × | ¥e, | ₩, |
| Installed TMI Lessons Learned Implementation Equipment Summary | ða, | 96 | | | | |
| | | | | | | |

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Maintenance and Replacement Schedule Summary

| Franklin Research Center | | | |
|-------------------------------------|-------|-------|----------|
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| FRC Assignment No. 13 |
| FRC Task No. 454 |

| F | 2 | ag | e | ŀ. |
|---|---|----|---|----|
| | 1 | b | | |

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 12

SUMMARY OF LICENSEE RESPONSES TO THE NRC SER - ONLY CHECKED ITEMS ARE APPLICABLE:

- ____ The Licensee (has/has not) provided a response to the SER concerns.
- ____ The Licensee (has/has not) specifically stated that the equipment is qualified and/or will function when exposed to the applicable DBE environmental service conditions.
- The Licensee has presented information which shows there are no outstanding qualification deficiencies.
- ____ The Licensee (has/has not) proposed a corrective action for this equipment item whose qualification has not been fully established.
 - _____ Justification for interim operation (has/has not) been provided by the Licensee for this equipment item.
 - Corrective action specified by the Licensee:
 - Equipment replacement with qualified equipment
 - Equipment modification
 - Equipment relocation above submergence level
 - ____ Relocate or shield equipment from radiation source
 - ____ Verify qualification by additional (testing/analysis)
 - Equipment relocation to a mild environment
 - ____ Qualification testing of equipment in progress
 - Other (
 - The Licensee has provided other information for this equipment item that can be construed as a basis for justification for interim operation.
 - The Licensee (has/has not) provided a schedule for the proposed corrective action. (Schedule for accomplishing the corrective action
 - The Licensee states that the equipment item does not require qualification and/or should be exempted from environmental qualification.

DESIGNATION OF RESULTANT NRC QUALIFICATION EVALUATION CATEGORY BASED ON REVIEW - CIRCLED ITEM ONLY: (See Section 3 of this TER for Legend)

I.a Qualified I.b Modification II.a Qualification Not Established II.b Not Qualified

II.c Qualified Life Deficiency III.a Exempt III.b Not in Scope IV Documentation Not Available

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 12

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

NRC REQUIREMENTS

DESIGNATION: X = DEFICIENCY

| Documented Evidence of Qualification Adequate |
|---|
| Adequate Similarity Between Equipment and Test Specimen Established |
| Aging Degradation Evaluated Adequately |
| Qualified Life or Replacement Schedule Established (If Required) |
| Program Established to Identify Aging Degradation |
| Criteria Regarding Aging Simulation Satisfied (If Required) |
| Criteria Regarding Temperature/Pressure Exposure: |
| o Peak Temperature Adequate |
| o Peak Pressure Adequate |
| o Duration Adequate |
| o Required Profile Enveloped Adequately |
| o Steam Exposure (If Required) Adequate |
| Criteria Regarding Spray Satisfied |
| Criteria Regarding Submergence Satisfied |
| Criteria Regarding Radiation Satisfied |
| Criteria Regarding Test Sequence Satisfied |
| Criteria Regarding Test Failures or Severe Anomalies |
| (If Any) Satisfied |
| Criteria Regarding Functional Testing Satisfied |
| Criteria Regarding Instrument Accuracy Satisfied |
| Test Duration Margin (1 hour + Function Time) Satisfied |
| Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I) |
| |

NRC QUALIFICATION CATEGORY

DESIGNATION: X = CATEGORY

| I.a | Equipment Qualified | |
|-------|--|---|
| I.b | Equipment Qualification Pending Modification | |
| II.a | Equipment Qualification Not Established | |
| II.D | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life | |
| | or Replacement Schedule Justified | |
| III.a | Equipment Exempt From Qualification | X |
| III.D | Equipment Not in the Scope of the Qualification Review | |
| IV | Documentation Not Made Available | |

This equipment item was previously evaluated in Reference 59. See page 1A Equipment Item description.

Franklin Research Center A Division of The Franklin Institute 20th and Race Streets, Phila., Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 4/5/4

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 12

LICENSEE RESPONSE TO NRC SER

Items 4.4.1, 4.4.2, 4.4.3, and 4.4.4 address items exempt from qualification. RG&E notes that the MVA's for MOV's 878A and 878C, located in the hot leg safety injection lines, should be included in 4.4.2, as discussed previously.



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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 13

Equipment Item No. 13 Motorized Valve Actuators Located in Auxiliary Building (Area #2) Limitorque Model SMB-00 with Peerless Electric Co. Motor Actuates BAST to SI Pump Valves (MOV-826A, B, C, D); and RWST to SI Pump Valves (MOV-896A, B) Licensee Reference 12 Kequired Operating Time: Short term (before sump recirculation) TER Checksheet No. 13 Reference 59, Section 4.3.3.4 Licensee Submittal: Page 6 [62]; Table 3, Page 2 [1]; FRC SCEW 11, 12

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

Not stated, Not applicable

LISTING OF APPLICABLE CHECKSHEETS:

| Contents | Chec | kshe | et I | Page | No. | | |
|---|--------------------|----------|----------|-----------|--------------|-----|--|
| Equipment Item | la | | | | | | |
| Summary of Licensee Responses to the NRC SER | lb | | | | | | |
| Equipment Environmental Qualification Summary Forms | 2 | | | | | | |
| Licensee Response to NRC SER | 3a, | 36. | 36. | 3d | | | |
| System Consideration Review | 44. | 46, | ¥ć, | 41, | 44, | ₩ | |
| Equipment Environmental Qualification Review | 5 €, 5g, | ж, Ж, | %, %, | 58, 55 | 9 6 , | 5£, | |
| Installed TMI Lessons Learned Implementation Equipment Summary | φá, | 68 | | | | | |
| Maintenance and Replacement Schedule Summary | to, | The. | 76. | | | | |

| A Division of The Franklin Institute 20th and Race Streets. Phila Pa 19103 (215) 448-1000 | NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>4.54</u> | Page Ib |
|--|--|------------|
| QUIPMENT ENVIRONMENTAL QUALIFI | CATION REVIEW OF EQUIPMENT ITEN | NO. 13 |
| | | |
| UMMARY OF LICENSEE RESPONSES TO THE | NRC SER - ONLY CHECKED ITEMS ARE AN | PFLICABLE |
| X The Licensee (has/h as not) provid | ded a response to the SER concerns. | |
| X The Licensee (has not) species qualified and/or will function we environmental service conditions | fically stated that the equipment is hen exposed to the applicable DBE | 3 |
| The Licensee has presented inform outstanding qualification defici- | mation which shows there are no encies. | |
| The Licensee (has/has not) propositem whose qualification has not | sed a corrective action for this equipeen fully established. | ipment |
| Justification for interim op Licensee for this equipment | eration (has/has not) been provided item. | by the |
| Corrective action specified | by the Licensee: | |
| Equipment replacement with | th qualified equipment | |
| Equipment relocation abo | ve submergence level | |
| Relocate or shield equip | ment from radiation source | |
| Equipment relocation to | a mild environment | |
| Qualification testing of Other (| equipment in progress |) |
| The Licensee has provided of that can be construed as a b operation. | her information for this equipment is asis for justification for interim | ltem |
| The Licensee (has/has not) proceeding of the corrective action. (Schedulation) | rovided a schedule for the proposed e for accomplishing the corrective |) |
| The Licensee states that the equ and/or should be exempted from e | ipment item does not require qualif: nvironmental qualification. | ication |
| ESIGNATION OF RESULTANT NRC QUALIFI CIRCLED ITEM ONLY: (See Section 3 | CATION EVALUATION CATEGORY BASED ON of this TER for Legend) | REVIEW |
| .a Qualified | (II.c) Qualified Life Deficiency | |
| II.a Qualification Not Established | III.b Not in Scope | |
| I.b Not Qualified | TT Desimple bing Neb Augilah | |

Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila. Pa 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. _ 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 13

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

DESIGNATION: X = DEFICIENCYNRC REQUIREMENTS Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I) DESIGNATION:

NRC QUALIFICATION CATEGORY

X = CATEGORY

| I.a | Equipment Qualified | |
|-------|--|-----|
| I.b | Equipment Qualification Pending Modification | |
| II.a | Equipment Qualification Not Established | |
| II.D | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life | |
| | or Replacement Schedule Justified | _X_ |
| III.a | Equipment Exempt From Qualification | |
| III.D | Equipment Not in the Scope of the Qualification Review | |
| IV | Documentation Not Made Available | |

This equipment item was previously evaluated in Reference 59. See page 1A Equipment Item description.

Franklin Research Center A Division of The Franklin Institute 20th and Race Strivets. Phila., Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. _____454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 13

LICENSEE RESPONSE TO NRC SER

Item 4.3.3.4 addresses various MVA's in the auxiliary building. Inclusion of these valves in the maintenance/ surveillance program described in Reference 72 should relieve the concerns relative to aging. Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila. Pa 19103 (215) 448-1000

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 13

NOTES: has identified - icmsel This equipment reerless Electric a has not specifically riport Au quali linghouse nenc here The molor insulation class "B" Le en am T Ima app 100 adiction anly No 58 5 rinc miloraus escribe Cattor.

4.1.4 Generic Qualification

A Division of The Franklin Institute

A Division of The Franklin Institute FRC A 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 FRC T

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 13

NOTES: Keport Bo 6 IMITOR QUE has oulsi aex app unation n res 7. estimate aller ed Rena imal aug 120 La legiaa a Mars much h ina 1 NIN an lucky 1 2 main anc nty igna. um information gin ns matim m ua tec h 1 21 21 lan eter inc

A Division of The Franklin Institute 20th and Race Streets. Phila., Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 14

Equipment Item No. 14 Motorized Valve Actuators Located in Auxiliary Building (Area #2) Limitorque Model SMB-00 with Reliance Electric Co. Motor Actuates Valves in Lines Between RWST and SI Pumps Valve (MOV-825A, B) Licensee Reference 12, 87, and 662 Required Operating Time: Short term (before sump recirculation) TER Checksheet No. 14 Reference 59, Section 4.3.3.5 Licensee Submittal: Page 7 [62]; Table 3, Page 3 [1]; FRC SCEW 13

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

(Not stated,) Not applicable

LISTING OF APPLICABLE CHECKSHEETS:

| Contents | Chec | ckshe | eet 1 | Page | No. | |
|---|------|------------|-----------|------------|-----|-----|
| Equipment Item | la | | | | | |
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| Equipment Environmental Qualification Summary Forms | 2 | | | | | |
| Licensee Response to NRC SER | 3a, | 3%, | 3,5, | 36. | | |
| System Consideration Review | 46. | 40, | 48, | ¥4., | 襙, | ∢ |
| Equipment Environmental Qualification Review | 5g, | 56, 5h, | 96, X, | 34, 35, | 58, | 5£, |
| Installed TMI Lessons Learned Implementation Equipment Summary | ŝá, | 6 8 | | | | |
| Maintenance and Replacement Schedule Summary | za, | 75. | 25 | | | |

| I | Franklin Research Center | | |
|---|--------------------------------------|-------|-----|
| | A Division of The Franklin Institute | | |
| | 20th and Pace Structs Phila Pa 19103 | (215) | 445 |

| | Task No |
|---|--|
| QUIPMENT ENVIRONMENTAL QUALIFICATION | REVIEW OF EQUIPMENT ITEM NO. 14 |
| | |
| SUMMARY OF LICENSEE RESPONSES TO THE NRC SE | R - ONLY CHECKED ITEMS ARE APPLICABLE: |
| X The Licensee (has/bas_pot) provided a r | esponse to the SER concerns. |
| The Licensee (has/has not) specifically qualified and/or will function when expensionmental service conditions. | stated that the equipment is osed to the applicable DBE |
| The Licensee has presented information outstanding qualification deficiencies. | which shows there are no |
| The Licensee (has/has not) proposed a c item whose qualification has not been f | orrective action for this equipment ully established. |
| Justification for interim operation Licensee for this equipment item. | (has/has not) been provided by the |
| Corrective action specified by the | Licensee: |
| Equipment replacement with qual Equipment modification Equipment relocation above subm Relocate or shield equipment fr Verify qualification by addition Equipment relocation to a mild Qualification testing of equipm Other (| ified equipment ergence level om radiation source onal (testing/analysis) environment ent in progress |
| The Licensee has provided other inf that can be construed as a basis fo operation. | ormation for this equipment item or justification for interim |
| The Licensee (has/has not) provided corrective action. (Schedule for a action | a schedule for the proposed accomplishing the corrective .) |
| The Licensee states that the equipment and/or should be exempted from environm | item does not require qualification mental qualification. |
| DESIGNATION OF RESULTANT NRC QUALIFICATION - CIRCLED ITEM ONLY: (See Section 3 of the | EVALUATION CATEGORY BASED ON REVIEW s TER for Legend) |
| I.a Qualified II. I.b Modification III II.a Qualification Not Established III II.b Not Qualified IV | Qualified Life Deficiency a Exempt b Not in Scope Documentation Not Available |

Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 14

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

DESIGNATION: X = DEFICIENCY NRC REQUIREMENTS Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Fressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

NRC QUALIFICATION

| I.a | Equ' Para Di Lified | |
|-------|--|-----|
| I.b | Equiperation Pending Modification | |
| II.a | Equipment Qualification Not Established | |
| II.b | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life | |
| | or Replacement Schedule Justified | _X_ |
| III.a | Equipment Exempt From Qualification | |
| III.D | Equipment Not in the Scope of the Qualification Review | |
| IV | Documentation Not Made Available | - |

This equipment item was previously evaluated in Reference 59. See page 1A Equipment Item description.

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DESIGNATION: X = CATEGORY Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila., Pa. 19103 (215) 448-1000

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 14

LICENSEE RESPONSE TO NRC SER

Item 4.3.3.5 addresses the MVA's actuating MOV's 825A and 825B. Inclusion of these valves in the maintenance/ surveillance program described in Reference 72 should relieve the concerns relative to aging. Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 14

NOTES:

1. Licensee has identified this equipment em as SMB-00 with a Reliance Electric Co. Motor. The Licensee has not specifically identified valid test report to substantiate gualification. The WESTINGHOUSE specification identified reference 12 establishes the motor insulation to be class B Reference 87 states that LIMITORQUE REPORT BODO3 is applicable equipmen 15 radiation on Reference Ln 662 LIMITORQUE KEPORT BOD58. generic describes 1+5 qualitication this way: 4.1.4 Generic Qualification Generic qualification means qualifying a group (family) of actuators by subjecting a valve actuator representative of the family to the aging and environmental criteria indicated in this report. The qualification

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 14

NOTES: perence 662 (Timitorque Report $\varphi \varphi \varphi 3$ 6 has been revered and has been aulade n acce or ontainment applica 7 has previously stat cense es safety functi The su eti 0 im a verse The a lary due recircu $) \cap$ in qualification en onno requir tenis hos h 1 se 8 been qual un life estimate PITh 1 an indipendent m lan essau R 54 dequately unal degradati any ia nali 110 ing mu a pendin arn 010 lile line mi elki clinely in men ncl maintenanc ag Intify gunen informa

NRC Contract No. NRC-03-79-118 Page FRC Project No. C5257 Franklin Research Center 5h FRC Assignment No. 13 A Division of The Franklin Institute FRC Task No. _ 454 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 14 NOTES: 662 and 1417 it is possible to determine such a value via use as The archenius Sechnique described in Reference 1417.

A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (213) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 15

Equipment Item No. 15 Motorized Valve Actuators Located in Intermediate Building (Area #3) Limitorque Model SMB-00 with Reliance Electric Co. Motor Actuates AFW Discharge Valves (MOV-4007, 4008); AFW Suction Valves (MOV-4027, 4028); and AFW Cross-Connect Valves (MOV-4000A, B) Licensee reference not cited Required Operating Time: Short term. TER Checksheet No. 15 Reference 59, Section 4.3.3.1 Licensee Submittal: Page 5 [62]; Table 3, Page 3 [1]; FRC SCEW 14, 15, 16

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

R, T, QT, RT, P, H, CS, (A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

Not stated, Not applicable

LISTIN; OF APPLICABLE CHECKSHEETS:

| Contents | Chec | ckshe | et I | Page | No. | |
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| Equipment Item | la | | | | | |
| Summary of Licensee Responses to the NRC SER | lb | | | | | |
| Equipment Environmental Qualification Summary Forms | 2 | | | | | |
| Licensee Response to NRC SER | 3a, | 36, | 3,5 | 3)8 | | |
| System Consideration Review | 4a, | 40, | 4c, | 4d, | 4e, | 4f |
| Equipment Environmental Qualification Review | ¥4, 5%, | 5×, | 5%, X, | 58., 95. | \$ 8 , | €, |
| Installed TMI Lessons Learned Implementation Equipment Summary | 98. | 616 | | | | |
| Maintenance and Replacement Schedule Summary | Tá, | 76. | the | | | |

| man | | | | | | | |
|------|------------------------|----------|-------|-------|-------|-----|------|
| 0000 | Franklin Research | Cent | er | | | | |
| | A Division of The Fran | klin Ins | titut | e | | | |
| | 20th and Race Streets. | Phila. | Pa | 19103 | (215) | 448 | 1000 |

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 15

| SUMMARY OF LICENSEE RESPONSES TO THE N | RC SER - ONLY CHECKED ITEMS ARE APPLICABL |
|--|---|
| | |
| | |
| X The Licensee (has/has Act) provide | d a response to the SER concerns. |
| | |
| The Licensee (has/has not) specifi | cally stated that the equipment is |
| gualified and/or will function whe | n exposed to the applicable DBE |
| environmental service conditions. | |
| unter official out fire official official | |
| The Licensee has presented informa | tion which shows there are no |
| outstanding qualification deficien | cies. |
| outstanding quarrieación derioren | N 1 C O * |
| The Licensee (has/has not) propose | a corrective action for this equipment |
| item uboco qualification has not h | a a collecter alighed |
| item whose qualification has not b | een rurry escaprished. |
| Justification for interim oper | ation (has/has not) been provided by the |
| Liconson for this aquinment it | an an and the host seen provided of the |
| breensee for chirs equipment re | .em. |
| Corrective action specified by | the Licensee. |
| Corrective action specified by | the breensee. |
| Rauinment replacement with | qualified equipment |
| Equipment modification | duarried equipment |
| Equipment modification | aubaargaaga lawal |
| Equipment relocation above | submergence level |
| Relocate or shield equipme | ant from radiation source |
| Verity qualification by ac | Iditional (testing/analysis) |
| Equipment relocation to a | mild environment |
| Qualification testing of e | equipment in progress |
| Other (|) |
| and the second se | |
| The Licensee has provided othe | er information for this equipment item |
| that can be construed as a bas | sis for justification for interim |
| operation. | |
| | |
| The Licensee (has/has not) pro | ovided a schedule for the proposed |
| corrective action. (Schedule | for accomplishing the corrective |
| action | .) |
| the second s | |
| X The Licensee states that the equip | pment item does not require qualification |
| and/or should be exempted from env | vironmental qualification. |
| | |
| ESIGNATION OF RESULTANT NRC QUALIFIC. | ATION EVALUATION CATEGORY BASED ON REVIEW |
| CIRCLED ITEM ONLY: (See Section 3 | of this TER for Legend) |
| | |
| .a Qualified | II.c Qualified Life Deficiency |
| 1.b Modification | (III.a) Exempt |
| II.a Qualification Not Established | III.b Not in Scope |
| I.b Not Qualified | IV Documentation Not Available |
| NAME AND ADDRESS OF A DESCRIPTION OF A D | |
| | |

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 15

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

DESIGNATION: X = DEFICIENCY .

| Documented Evidence of Qualification Adequate | _ |
|---|---|
| Adequate Similarity Between Equipment and Test Specimen Established | |
| Aging Degradation Evaluated Adequately | |
| Qualified Life or Replacement Schedule Established (Ir Required) | |
| Program Established to Identify Aging Degradation | |
| Criteria Regarding Aging Simulation Satisfied (If Required) | |
| Criteria Regarding Temperature/Pressure Exposure: | |
| o Peak Temperature Adequate | |
| o Peak Pressure Adequate | |
| o Duration Adequate | _ |
| Required Profile Enveloped Adequately | |
| o Steam Exposure (If Required) Adequate | |
| Criteria Regarding Spray Satisfied | |
| Criteria Regarding Submergence Satisfied | |
| Criteria Regarding Radiation Satisfied | |
| Criteria Regarding Test Sequence Satisfied | |
| Criteria Regarding Test Failures or Severe Anomalies | |
| (If Any) Satisfied | |
| Criteria Regarding Functional Testing Satisfied | |
| Criteria Regarding Instrument Accuracy Satisfied | |
| Test Duration Margin (1 hour + Function Time) Satisfied | |
| Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I) | |

NRC QUALIFICATION CATEGORY

NRC REQUIREMENTS

DESIGNATION: X = CATEGORY

| I.a | Equipment Qualified |
|-------|--|
| I.b | Equipment Qualification Pending Modification |
| II.a | Equipment Qualification Not Established |
| II.b | Equipment Not Qualified |
| II.c | Equipment Satisfies All Requirements Except Qualified Life |
| | or Replacement Schedule Justified |
| III.a | Equipment Exempt From Qualification |
| III.b | Equipment Evaluation Deferred |
| IV | Documentation Not Made Available |

Franklin Research Center A Division of The Franklin Institute 20th and Race Streets, Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 15

LICENSEE RESPONSE TO NRC SER

"In Section 4.3.3.1, it is stated that 'a thorough review of the AFW system(s) at this plant (see Item E.1 in Appendix E) has led to the conclusion that the present configuration, with remote-manual initiation of the standby AFW system, is not satisfactory.' RG&E must dispute this conclusion. In fact, the NRC has reviewed and approved the present configuration of the AFW system. In the NRC's 'SEP Review of Safe Shutdown Systems for the R. E. Ginna Nuclear Power Plant,' it was determined that:

'The AFS and SAFS conform to GDC 19, "Control Room," GDC 44, "Cooling Water," GDC 45, "Inspection of Cooling Water Systems," GDC 46, "Testing of Cooling Water Systems," and Regulatory Guide 1.62, "Manual Initiation of Protective Actions." GDC 5, "Sharing of Structures, Systems and Components," is not applicable.'

"Further, the NRC reviewed the RG&E arrangement during the review of SEP Topic III-5.B, 'Pipe Break Outside Containment.' In Table 1 of the assessment, it is noted that the Intermediate Building elevation 253', where the pumps are located, is adequately protected from pipe break effects because '. . . there exists another system (SAFS) to supply auxiliary feed to the steam generators . . . '

"Finally, the NRC has reviewed the RG&E accident analyses during the 'Design Basis Event' topic assessments, transmitted by letter of June 29, 1981. The limiting case of a Feedwater Line Break was evaluated as SEP Topic XV-6. In that assessment, acceptability of the Ginna system was based, in part, on approval of a feedline break analysis which took no credit for the Auxiliary Feedwater System, but only remote-manual actuation of the Standby Auxiliary Feedwater System in 10 minutes.

"Based on these numerous reviews and approvals by the NRC of our present AFW system configuration, the TER conclusion that our present system is unacceptable should be withdrawn." Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 15

SYSTEM CONSIDERATION REVIEW

The Licensee has stated that this equipment item does not require environmental qualification and/or should be exempted from qualification. The Licensee's rationale has been evaluated and the reasons for concurrence/ non-concurrence with the technical basis of the Licensee's position are presented below.

Reason for Concurrence

- Equipment does not provide a safety function or mitigate the consequences of a design basis accident. Equipment Environmental Qualification is not required by the DOR Guidelines. (NRC Qualification Evaluation Category IIIa)
 - Equipment is not exposed to a harsh environment by the accident it is intended to mitigate. See note (1) on page 4b. (NRC Qualification Evaluation Category IIIb)
- X Backup (equipment/system) is available which completely performs the safety function. The backup (equipment/system) is environmentally qualified and appears to meet single active failure criterion. See note (1) on page 4b. (NRC Qualification Evaluation Category IIIa)

.

Reason for Non-Concurrence

- Backup (equipment/system) is not fully capable of performing the intended safety function or accident mitigating function.
- Backup (equipment/system) is not environmentally qualified and can be exposed to a hostile environment simultaneously with the primary equipment.
- Backup (equipment/system) is subject to a potentially disabling single active failure.
- Failure of the primary equipment can compromise the ability of other safety-related equipment to perform its specified safety function.
- Failure of the primary equipment can result in erroneous indication which could mislead an operator.
- Requirement for continued functioning throughout the post-accident period necessitates environmental qualification.



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NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 15

Reason for Concurrence

- The equipment's accident mitigating function is completed prior to the onset of the hostile environment. No subsequent functions are necessary. See note (1) below. (NRC Qualification Evaluation Category IIIb)
- Other (see page)
- Resultant NRC Qualification Evaluation Category (IIIa/IIIb)
- X Note 1: The Licensee (have/ nas not) stated that failure of the primary equipment will not affect other safety-related equipment or cause an operator to be misled. (See page___)

Reason for Non-Concurrence

- Although backup equipment is available, it is not technically sound to relinquish defense-in-depth for this function.
- Backup (equipment/system) is not safety-related.
- This equipment is necessary for the operator to ensure an ESF system is performing its intended safety function.
- The rationale presented by the Licensee is not supported by objective technical evidence.
- ___ Other (see page___)

LICENSEE STATEMENT

See page 3a of this checksheet.

EVALUATION OF LICENSEE STATEMENT

Evaluation From TER-C5257-178

"The AFW system at Ginna consists of a main AFW system and a standby AFW system. The main AFW system consists of three pumps (two motor-driven, each 200 gpm, and one turbine-drive, 400 gpm). Normally, each motor-driven pump supplies one steam generator but, with operator action, either motor-driven pump can provide feedwater to both steam generators. The turbine-driven pump normally provides feedwater to both steam generators. Flow from one motor-driven pump to one steam generator is sufficient to cool the plant to the temperature at which the RHR system can be used to bring the plant to a cold shutdown condition. A steam generator will boil dry in approximately 30 minutes without any feedwater flow and a reactor trip. Franklin Pesearch Center A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 15

SYSTEM CONSIDERATION REVIEW

EVALUATION OF LICENSEE STATEMENT (Continued)

"All three of the main AFW pumps are located in the same room and could be rendered inoperable as a result of HELB. The standby AFW system was added to provide independent AFW capability following such an event. The standby AFW system is in a separate plant area from the main AFW system. The standby AFW system consists of two motor-driven pumps. Each motor pump has a capacity of 200 gpm and supplies one steam generator. The pumps are in the same room but are separated by a partial wall. The standby AFW system functions independently of the main AFW system. The main AFW pumps are interlocked with the standby AFW system so that both are not simultaneously loaded onto their respective vital AC buses to prevent overloading the vital buses on loss of offsite power.

"In recommendation 2.1.7 of NUREG-0578, TMI-2 Lessons Learned Task Force Status Report and Short-Term Recommendations, the task force recommended automatic initiation of all AFW systems. In NUREG-0611, Generic Evaluation of Feedwater Transients and Small Break Loss-of-Coolant Accidents in Westinghouse-Designed Operating Plants, the NRC staff further recommended that RG&E upgrade the AFW system automatic initiation signals and circuits to meet safety-grade requirements. RG&E responded to the recommendations of NUREG-0611 stating that the AFW pumps at Ginna were automatically initiated and that these circuits met safety-grade requirements. However, the pumps which are automatically initiated are the main AFW pumps which are capable of being rendered inoperable by a single HELB. In addition, the following characteristics of the AFW systems are germane to this problem:

 The primary source of water for the main AFW system is from two 30,000-gallon non-seismic Category I condensate storage tanks. The backup sources are the condenser hotwell and a non-seismic Category I

100,000-gallon condensate storage tank which can be connected. The pump, which transfers water from the botwell or the 100,000-gallon tank to the 30,000-gallon tanks, is powered from a non-safety grade supply.

- Connection to the backup source requires operator action, which is estimated to take approximately 15 minutes.
- The main AFW system also has a secondary seismic Category I water source; namely, the service water system (SWS) which draws water from Lake Ontario. It is estimated to take approximately 5 minutes to connect this source.

 The switchgear to disconnect potentially faulted AFW pump motors from their respective vital buses are located in the auxiliary building (away from the harsh environment) and have sufficient physical separation to preclude a common-mode failure of the independent power Franklin Research Center A Division of The Franklin Institute 20th and Race Streets, Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 15

SYSTEM CONSIDERATION REVIEW

EVALUATION OF LICENSEE STATEMENT (Continued)

trains. The Licensee has verified that the fuse-and-breaker scheme for this equipment will prevent electrical faults from being reflected onto the vital buses.

o The primary source of water to the standby AFW system is the SWS.

"The NRC staff is currently reviewing Licensee responses to NUREG-0611 as part of the AFW system reliability improvements stemming from the experiences at TMI-2. The results of this review may affect certain design features and/or environmental qualification requirements of the AFW system at Ginna. For the purposes of this report, the FRC conclusions presented below are based upon the current status of the system."

Conclusion From TER-C5257-178

"In view of the above discussion, FRC considers that the capability to manually initiate the standby AFW system does not provide sufficient justification for the position that environmental qualification of the main AFW pump motors and motor-operated valves is not necessary. Nonqualification could be justified if the standby AFW system met current standards for AFW system reliability (e.g., standby AFW pumps automatically initiated with a reliable source of feedwater; main AFW pumps placed in the backup role). At the same time, it should be noted that, in view of the developing requirements with regard to AFW system performance, FRC does not find technical deficiencies with the Licensee's position in that reasonable backup AFW capability has been provided at Ginna while these issues are being reviewed." Franklin Research Center A Division of The Franklin institute 20th and Race Streets. Phila . Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 15

SYSTEM CONSIDERATION REVIEW

EVALUATION OF LICENSEE STATEMENT (Continued)

- Evaluation

original concern with the reliability of the AFW/standby AFW system at Ginna was based on the consideration that the safety-grade, automatically initiated system (main AFW system) is not environmentally qualified, while the environmentally qualified system (standby AFW system) is not automatically initiated. RG&E's reply, which cites previous review and approval of the AFW configuration by the NRC, does not specifically address this concern nor is it obvious that previous NRC reviews would necessarily have focused on environmental qualification considerations.

In any HELB other than a break in the AFW turbine pump steam supply line in the AFW pump room, the main AFW system is capable of automatically initiating and performing the required AFW function. In case of a HELB within the AFW pump room, the motor-driven pumps will also be automatically started (the turbine-driven pump is inoperative because of no steam supply). At some time after automatic startup, however, one or both of the motor pumps will likely fail because of the hostile steam environment. At this point, the standby AFW pumps would have to be manually started in order to continue AFW flow to the steam generators. The Licensee has indicated that NRC approval of the AFW configuration at Ginna has been predicated on a capability of remotemanual actuation of the standby AFW system in 10 minutes. Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila . Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 15

SYSTEM CONSIDERATION REVIEW

EVALUATION OF LICENSEE STATEMENT (Continued)

In summary, the following factors are significant in resolving this issue:

- Auxiliary feedwater will be automatically initiated and feedwater will be initially supplied to the steam generators by the main AFW motor-driven pumps at the start of an accident, when the decay heat rate is highest, regardless of the type or location of an HELB.
- o The HELB which may cause subsequent failure of the main AFW pumps (break of the AFW pump turbine line in the AFW pump room), is a less severe break than a main steam line break (MSLB) or feedwater line break (FWLB), which therefore allows additional time for operator action to start the standby system. A 10-minute remote-manual start of the standby system has been found to be sufficient by the NRC to mitigate a FWLB.
- o The main AFW pumps will not be rendered inoperable instantaneously by a HELB in the main AFW pump room, which should allow for an orderly shift-over to the standby pumps.
- Assuming both main AFW pumps have started, it is unlikely that their failure will be simultaneous. Shift-over to the standby pumps should be possible without losing continuity of AFW flow.

Considering the information developed by FRC's previous review of these systems, the additional information provided by the Licensee, and the above discussion, 'T's concluded that sufficient justification has been provided to support the Licensee's position that the standby AFW system provides an acceptable alternative to qualification of main AFW equipment which is subjected to the environment of the HELB in the AFW turbine steam supply line. FRC believes that the justifiable concerns expressed in TER-C5257-178 have been adequately resolved.

Conclusion

The AFW configuration at the Ginna plant will satisfactorily perform required AFW functions without documented environmental qualification of the main AFW equipment, which is subjected to the environment of a HELB in the AFW turbine steam supply line. Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000

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Page I a

Ser.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 16

Equipment Item No. 16 Motorized Valve Actuators Located in Auxiliary Building (Area #2) Limitorque Model SMB-00 with Reliance Electric Co. Motor Actuates Sump Valves (MOV-850A, B); RHR to SI Valves (MOV-857A, B, C); RWST to RHR Valves (MOV-856); and CS Valves (MOV-860A, B, C, D and MOV-704A, B) Licensee References 637, 639, 659, 662, and 87 Required Operating Time: Long term TER Checksheet No. 16 Reference 59, Section 4.3.1.4 Licensee Submittal: Page 5 [62]; Table 3, Page 3 [1]; FRC SCEW 17, 18, 19, 20

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

R, T, QT, RT, P, H, CS, (A,) S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

Not stated, Not applicable

LISTING OF APPLICABLE CHECKSHEETS:

Checksheet Page No. Contents Equipment Item la Summary of Licensee Responses to the NRC SER 1b 2 Equipment Environmental Qualification Summary Forms 3a, 38, 38, 38, 38 Licensee Response to NRC SER 物, 物, 秋, 秋, 秋, 长, 秋 System Consideration Review 统, 流, 光, 光, 光, 光, Equipment Environmental Qualification Review 39, 36, 34, 34 Installed TMI Lessons Learned Implementation 6a, 64 Equipment Summary

72, 78, 70

Maintenance and Replacement Schedule Summary

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 16

SUMMARY OF LICENSEE RESPONSES TO THE NRC SER - ONLY CHECKED ITEMS ARE APPLICABLE:

- X The Licensee (has/has not) provided a response to the SER concerns.
- ____ The Licensee (has/has not) specifically stated that the equipment is qualified and/or will function when exposed to the applicable DBE environmental service conditions.
- The Licensee has presented information which shows there are no outstanding qualification deficiencies.
- The Licensee (has/has not) proposed a corrective action for this equipment item whose qualification has not been fully established.
 - _____Justification for interim operation (has/has not) been provided by the Licensee for this equipment item.
 - Corrective action specified by the Licensee:
 - Equipment replacement with qualified equipment
 - Equipment modification
 - Equipment relocation above submergence level
 - ____ Relocate or shield equipment from radiation source
 - ____ Verify qualification by additional (testing/analysis)
 - Equipment relocation to a mild environment
 - ____ Qualification testing of equipment in progress
 - Other (
 - The Licensee has provided other information for this equipment item that can be construed as a basis for justification for interim operation.
 - The Licensee (has/has not) provided a schedule for the proposed corrective action. (Schedule for accomplishing the corrective action
- The Licensee states that the equipment item does not require qualification and/or should be exempted from environmental qualification.

DESIGNATION OF RESULTANT NRC QUALIFICATION EVALUATION CATEGORY BASED ON REVIEW - CIRCLED ITEM ONLY: (See Section 3 of this TER for Legend)

I.a Qualified I.b Modification II.a Qualification Not Established II.b Not Qualified (II.c) Qualified Life Deficiency III.a Exempt III.b Not in Scope IV Documentation Not Available

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A Division of The Franklin Institute 20th and Race Streets, Phila., Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>45</u>

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 16 EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM DESIGNATION: X = DEFICIENCY NRC REQUIREMENTS Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Cliteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I) DESIGNATION: X = CATEGORY NRC QUALIFICATION CATEGORY Equipment Qualified I.a Equipment Qualification Pending Modification I.b ×____ Equipment Qualification Not Established II.a II.b Equipment Not Qualified II.c Equipment Satisfies All Requirements Except Qualified Life or Replacement Schedule Justified III.a Equipment Exempt From Qualification III.b Equipment Not in the Scope of the Qualification Review Documentation Not Made Available IV See notes section: Pages 5 f, 5g

This equipment item was previously evaluated in Reference 59. See page 1A Equipment Item description.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 16

LICENSEE RESPONSE TO NRC SER

4.3.1.4 - Various motorized valve actuators (Note: the MVA's for MOV's 704A and 704B should be added to this list). It is not clear why the TER requests that RG&E determine a "qualified life," since the DOR Guidelines specifically state that a qualified life need not be determined for all electrical equipment. Aging degradation was assessed in the Limitorque test report B0003 (200 hours at 165°F). Finally these MVA's will be considered in the maintenance/surveillance program noted in Reference 72.

motorized valve actuators for 704 A, B - These MVA's will see a harsh radiation environment during post-LOCA sump recirculation. Their qualification is addressed in RG&E's Reference 53; however, they were not specifically identified in our October 31, 1980 submittal. These MVA's will be added to item 8E of Table 3 of that submittal. Franklin Research Center A Division of The Franklin Institute 20th and Race Streets, Phila, Pa. 19103 (215) 448-1000

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 16

NOTES: the -1 cmare identified SMB-00 K Electric elianc. with a motor 1h -1 censel specifically idente as not fist report cation hor equip 10 nat erenc - m aul +0 eg ome only radiation hu imitors describes its ineric qua 4.1.4 Generic Qualification

Generic qualification means qualifying a group (family) of actuators by subjecting a valve actuator representative of the family to the aging and environmental criteria indicated in this report. The qualification of the Limitorque Size SMB-0, as reported in the documentation of each of the four tests, was used to generically qualify all sizes of Limitorque operators for the environmental test conditions in accordance with IEEE 382-1972. The Size SMB-0 actuators is an average mid-size unit, and all other sizes of the type SMB, SB, SBD, and SMB/HBC are also deemed qualified. All sizes are constructed of the same materials with components designed to equivalent stress levels, same clearances and tolerances with the only difference being in physical size which varies corresponding to the differences in unit rating. A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 16

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 12

Equipment Item No. 17 Motorized Valve Actuators Located Inside Containment (Area #1) Limitorque Model SMB-00 with Peerless Motor Actuates Valves for PMR Suction from Sump B (MOV-851A, B); SI Valves to Cold Legs (MOV-878B, D); SI Valves to Hot Legs (MOV-878A, C) Licensee Reference 12 Required Operating Time: Not required to operate TER Checksheet No. 17 Reference 59, Section 4.4.2 Licensee Submittal: Page 7 [62]; Table 3, Pages 3 and 4 [1]; FRC SCEW 21, 22, 72

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

Not stated, Not applicable

LISTING OF APPLICABLE CHECKSHEETS:

Checksheet Page No. Contents Equipment Item la Summary of Licensee Responses to the NRC SER 1b 2 Equipment Environmental Qualification Summary Forms 3a, 36, 36, 34 Licensee Response to NRC SER 4a, 4b, 4c, 4d, 4e, 4t System Consideration Review 56, 55, 56, 58, 56, 58, Equipment Environmental Qualification Review 59, 50, 54, 53 66, 65. Installed TMI Lessons Learned Implementation Equipment Summary Maintenance and Replacement Schedule Summary 74, 76, 70

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NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

Page 1b

| - ONLY CHECKED ITEMS ARE APPLICABLE sponse to the SER concerns. stated that the equipment is sed to the applicable DBE hich shows there are no crective action for this equipment lly established. (has/has not) been provided by the icensee: fied equipment |
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| - ONLY CHECKED ITEMS ARE APPLICABLE sponse to the SER concerns. stated that the equipment is sed to the applicable DBE hich shows there are no rrective action for this equipment lly established. (has/has not) been provided by the icensee: fied equipment |
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| rgence level m radiation source |
| al (testing/analysis) |
| nt in progress |
| rmation for this equipment item justification for interim |
| a schedule for the proposed complishing the corrective .) |
| tem does not require qualification ental qualification. |
| EVALUATION CATEGORY BASED ON REVIEW TER for Legend) |
| Qualified Life Deficiency a) Exempt Conditional-see page 5g b Not in Scope |
| Documentation Not Available |
| |

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 12

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

DESIGNATION: X = DEFICIENCY

NRC REQUIREMENTS

Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

NRC QUALIFICATION CATEGORY

DESIGNATION: X = CATEGORY

| I.a | Equipment Qualified | _ |
|-------|---|---|
| I.b | Equipment Qualification Pending Modification | |
| II.a | Equipment Qualification Not Established | |
| II.b | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life or Replacement Schedule Justified | |
| III.a | Equipment Exempt From Qualification | |
| III.D | Equipment Not in the Scope of the Qualification Review | - |
| TV | Documentation Not Made Available | |

Note: This category is conditional based on the resolution of the discussion on page 5g.
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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 17

LICENSEE RESPONSE TO NRC SER

"In 4.1.1, it is noted that certain other items should be added to the list of safety-related electrical equipment requiring environmental qualification. These are discussed below:

"Actuators for valves in the hot leg injection paths (878A, 878C). A discussion of these valves was inadvertently omitted. These should have been discussed together with item 8G of the October 31, 1980 submittal (878B, 878D). The 878A and 878C valves are locked in position (closed) with power removed. No credit is taken for hot leg Safety Injection flow in the Ginna Safety Analysis. These valves should thus be classified in NRC Category III, equipment that is exempt from qualification." Franklin Research Center A Division of The Franklin Institute 20th and Race Streets, Phila, Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 17

SYSTEM CONSIDERATION REVIEW

The Licensee has stated that this equipment item does not require environmental qualification and/or should be exempted from qualification. The Licensee's rationale has been evaluated and the reasons for concurrence/ non-concurrence with the technical basis of the Licensee's position are presented below.

Reason for Concurrence

- Equipment does not provide a ______ safety function or mitigate the consequences of a design basis accident. Equipment Environmental Qualification is not required by the DOR Guidelines. (NRC Qualification Evaluation Category IIIa)
 - Equipment is not exposed to a harsh environment by the accident it is intended to mitigate. See note (1) on page 4b. (NRC Qualification Evaluation Category IIIb)
- Backup (equipment/system) is available which completely performs the safety function. The backup (equipment/system) is environmentally qualified and appears to meet single active failure criterion. See note (1) on page 4b. (NRC Qualification Evaluation Category IIIa)

Reason for Non-Concurrence

- Backup (equipment/system) is not fully capable of performing the intended safety function or accident mitigating function.
- Backup (equipment/system) is not environmentally qualified and can be exposed to a hostile environment simultaneously with the primary equipment.
- X Backup (equipment/system) is subject to a potentially disabling single active failure.
- Failure of the primary equipment can compromise the ability of other safety-related equipment to perform its specified safety function.
 - Failure of the primary equipment can result in erroneous indication which could mislead an operator.
 - Requirement for continued functioning throughout the post-accident period necessitates environmental qualification.

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Page 4b

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 17

Reason for Concurrence

The equipment's accident mitigating function is completed environment. No subsequent functions are necessary. See note (1) below. (NRC Qualification Evaluation Category IIIb)

Other (see page)

- Resultant NRC Qualification Evaluation Category (IIIa/IIIb)
- has not) stated that failure of the primary equipment will not affect other Note 1: The Licensee (has/ affect other safety-related equipment or cause an operator , to be misled. (See page)

Reason for Non-Concurrence

- Although backup equipment is avail-able, it is not technically sound to prior to the onset of the hostile relinquish defense-in-depth for this function.
 - Backup (equipment/system) is not safety-related.
 - This equipment is necessary for the operator to ensure an ESF system is performing its intended safety function.

 - Other (see page)

LICENSEE STATEMENT

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See page 3a of this checksheet.

EVALUATION OF LICENSEE STATEMENT

In evaluating Equipment Item 8G (Valves 878B and 878D, cold leg injection valves) in TER-C5257-178, FRC determined that these valves should be placed in NRC Category III because they were locked in their safety position (open) with power removed. However, valves 878A and 878C, the hot leg injection valves, are locked closed.

The Ginna Final Safety Analysis Report (FSAR), Section 6.2.2, states that the safety injection pumps deliver water through four connections, one in each hot leg and one in each cold leg of the RCS. Furthermore, Section 14.3, discussing small break LOCAs states:

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 17

SYSTEM CONSIDERATION REVIEW

EVALUATION OF LICENSEE STATEMENT (Continued)

"RESULTS - SMALL BREAKS

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"The preceding paragraphs have demonstrated the adequacy of the accumulators to terminate core exposure and limit the temperature rise of the core for large area ruptures. For smaller breaks the discharge of fluid through the hole is less severe and for small enough breaks the high head safety injection pump is capable of maintaining flooding of the core hot spot for the entire blowdown.

"Three combinations of high head safety injection equipment operation were considered:

- 1. Full system; three pumps delivering through the four injection lines.
- Single failure; two pumps delivering through three lines, one injection line isolation valve failed to open.
- Single failure and broken safety injection line; one pump delivering to intact header and second pump delivering to second header with one line broken.

"(This is a special case where the loss of coolant is caused by a break in the safety injection line between the reactor coolant pipe and the check valve in the injection line. In this case not only is the flow lost through the one line, but the effective cut-in pressure for delivery is reduced until the pressure loss due to flow in the spilling line equals the Reactor Coolant back pressure. Since the injection lines are only 2 inches in diameter, this case applies for break sizes 2 inches and smaller.)"

It is apparent that the FSAR assumes availability of the hot led injection points. In fact, it appears that with both hot led injection valves disabled closed and a broken cold led injection line, the system is reduced from three pumps discharding to four lines to one pump discharging to one line (the other two pumps pumping out the break). At this point, a single active failure to the appropriate pump and all safety injection flow would be interrupted until certain motor operated valves (such as MON-871A and 871P) can be realigned to redirect the discharge of one of the operable pumps from the broken cold led line to the intact line. TANCE

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NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. **454**

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 17

SYSTEM CONSIDERATION REVIEW

EVALUATION OF LICENSEE STATEMENT (Continued)

Consequently, it is not apparent why valves 878A and 878C are locked closed. It is possible that modifications have been made to the plant since the FSAR was written which changes the situation. Nevertheless, from the documentation available, it does not appear that valves 878A and 878C should be disabled closed.

Conclusion

Valves 878A and 878r should be outlified for the post-accident environment in order to retain post-accident operability.

NRC Contract No. NRC-03-79-118 WW Franklin Research Center Page FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454 59 A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIL OF EQUIPMENT ITEM NO. 17

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Franklin Research Center A Division of The Franklin Institute 20th and Race Streets, Phila., Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 18

Equipment Item No. 18 Motorized Valve Actuators Located Inside Containment (Area #1) Limitorque Model SMB-1 with Reliance Electric Co. Motor Actuates Core Deluge Valves (MOV-852A, B) Licensee References 26, 637, and 639 Required Operating Time: SI signal TER Checksheet No. 18 Reference 59, Section 4.3.3.2 Licensee Submittal: Page 6 [62]; Table 3, Page 4 [1]; FRC SCEW 23

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

Not stated, Not applicable

LISTING OF APPLICABLE CHECKSHEETS:

| Contents | Chec | kshe | et F | age | No. | |
|---|-------------------|--------------|------------|-----|-----|-----|
| Equipment Item | la | | | | | |
| Summary of Licensee Responses to the NRC SER | lb | | | | | |
| Equipment Environmental Qualification Summary Forms | 2 | | | | | |
| Licensee Response to NRC SER | 3a, | 36, | ×, | 32 | | |
| System Consideration Review | 46, | 426, | 45, | 44. | 46, | 45 |
| Equipment Environmental Qualification Review | 96. 59, | 516, 514, | 5%, 51, | 585 | Ś€, | 5f, |
| Installed TMI Lessons Learned Implementation Equipment Summary | òa, | 64 | | | | |
| Maintenance and Replacement Schedule Summary | 26. | 75. | 26 | | | |

| UU | Franklin Research | Center | r | | | |
|----|------------------------|-------------|-----|-------|-------|------|
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| | 20th and Race Streets. | Phila. P | a | 19103 | (215) | 448- |

NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

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| 20th and Race Streets. Phila., Pa. 19103 (215) 446-1000 | FRC Task No. 759 | |
|--|---|-----------------------|
| QUIPMENT ENVIRONMENTAL QUALIFIC | TION REVIEW OF EQUIPME | ENT ITEM NO. 18 |
| | | |
| UMMARY OF LICENSEE RESPONSES TO THE | C SER - ONLY CHECKED ITEM | S ARE APPLICABLE |
| X The Licensee (has/has not) provide | a response to the SER co | ncerns. |
| The Licensee (has/has not) specific qualified and/or will function who environmental service conditions. | ally stated that the equi exposed to the applicabl | pment is e DBE |
| The Licensee has presented information outstanding qualification deficies | ion which shows there are ies. | no |
| The Licensee (has/has not) propose item whose qualification has not h | a corrective action for en fully established. | this equipment |
| Justification for interim oper Licensee for this equipment is | tion (has/has not) been p m. | rovided by the |
| Corrective action specified by | the Licensee: | |
| Equipment replacement with Equipment modification | qualified equipment | |
| Equipment relocation above | submergence level | |
| Relocate or shield equipme | t from radiation source | |
| Equipment relocation to a | ild environment | , |
| Qualification testing of | uipment in progress | |
| Other (| |) |
| The Licensee has provided othe that can be construed as a bas operation. | information for this equ s for justification for i | ipment item nterim |
| The Licensee (has/has not) pro | ided a schedule for the p | roposed |
| corrective action. (Schedule | or accomplishing the corr | ective |
| action | | ··/ |
| The Licensee states that the equip and/or should be exempted from en | ent item does not require ronmental qualification. | qualification |
| ESIGNATION OF RESULTANT NRC QUALIFIC. | ION EVALUATION CATEGORY B | ASED ON REVIEW |
| - CIRCLED ITEM ONLY: (See Section 3 of | this TER for Legend) | |
| I.a Qualified | Qualified Life Def | iciency |
| L.b Modification | III.a Exempt | |
| II.a Qualification Not Established | III.D NOT IN Scope | Available |
| TTO HOU YOULLESS | at bootmaned atom not | |
| | | |

Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila . Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 18

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

DESIGNATION: X = DFFICIENCY

NRC REQUIREMENTS

Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied

Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

NRC QUALIFICATION CATEGORY

DESIGNATION: X = CATEGORY

| I.a | Equipment Qualified | |
|-------|--|---|
| I.b | Equipment Qualification Pending Modification | _ |
| II.a | Equipment Qualification Not Established | |
| II.b | Equipment Not Qualified | - |
| II.c | Equipment Satisfies All Requirements Except Qualified Life | × |
| | or Replacement Schedule Justified | |
| III.a | Equipment Exempt From Qualification | |
| III.D | Equipment Not in the Scope of the Qualification Review | |
| IV | Documentation Not Made Available | |

This equipment item was previously evaluated in Reference 59. See page 1A Equipment Item description.

A Division of The Franklin Institute 20th and Race Streets. Phila... Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 18

LICENSEE RESPONSE TO NRC SER

Item 4.3.3.2 addresses MVA's for motor operated valves 852A and 852B. Contrary to the FRC conclusion, a qualified life does not need to be established, in accordance with the DOR Guidelines. However, Reference 72 concerning maintenance/ surveillance does apply to these items. Franklin Research Center A Division of The Franklin Institute 20th and Race Streets, Phila., Pa. 19103 (215) 448-1000 Page 5f

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 18

NOTES: dente und SMB ØØ moto 1 censel specifically ner alion ho ue note equipmen 10 87 That Reperence. states - mitora 110 10 applicable to h equipmen only radiotim 1059 Re hering metoro 58 describes its iner 4.1.4 Generic Qualification Generic qualification means qualifying a group (family) of actuators by subjecting a valve actuator representative of the family to the aging and environmental criteria indicated in this report. The qualification

of the Limitorque Size SMB-O, as reported in the documentation of each of the four tests, was used to generically qualify all sizes of Limitorque operators for the environmental test conditions in accordance with IEEE 382-1972. The Size SMB-O actuators is an average mid-size unit, and all other sizes of the type SMB, SB, SBD, and SMB/HBC are also deemed qualified. All sizes are constructed of the same materials with components designed to equivalent stress levels, same clearances and tolerances with the only difference being in physical size which varies corresponding to the differences in unit rating. Franklin Research Center A Division of The Franklin Institute

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 18

NOTES: Reference 6. Imitorque BOOD3 662 N 101 and neen h conta inment asa icolion mo surve lenan am our lures la life uplified "estimate heen colour lated cumen eans. PN m necessary 10 4D ento estimatela a qualitied adequately life eno diarad age Una rela cause eny raing analysis 60 220 E Dan m Am 210 aua 1 established 11 m eller moly m MAP mainte AM in titu alganda. 1 17 ma N quen and 7 1 2A may +



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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 19

Equipment Item No. 19 Motorized Valve Actuators Located in Auxiliary Building Addition (Area #6) Limitorque Model SMB-00 with Reliance Electric Co. Motor Actuates Standby AFW Valves (MOV-9703A, B; 9704A, E; 9710A, B) Licensee References 30, 27, and 33 Required Operating Time: Long term TER Checksheet No. 19 Reference 59, Section 4.7.2 Licensee Submittal: Table 3, Page 4 [1]; FRC SCEW 24, 25, 26

| DESIGNATION | FOR | DEFI | CIENCY | IDE | NTIFIED | BY | THE | NRC | SER | - | CIRCLED | ITEM(S) | ONLY: |
|--------------|-------|-------|--------|-----|---------|----|-----|-----|-----|---|---------|---------|-------|
| (See Section | n 3 i | of th | is TER | for | Legend) | 1 | | | | | | | |

R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

Not stated, Not applicable Deferred LISTING OF APPLICABLE CHECKSHEETS:

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| Equipment Environmental Qualification Summary Forms | 2 | | | | | |
| Licensee Response to NRC SER | 34, | 36, | 3%, | 36 | | |
| System Consideration Review | 袖, | 税, | 45, | 44, | ₩, | ₩ |
| Equipment Environmental Qualification Review | 54, 59, | 918, 516, | 9%, 9%, | 5æ, 35. | 56, | ¥, |
| Installed TMI Lessons Learned Implementation Equipment Summary | ça, | ŝĸ | | | | |
| Maintenance and Replacement Schedule Summary | ta, | 70, | 76 | | | |

| A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 | NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u> | Page Ib |
|---|---|-----------------|
| EQUIPMENT ENVIRONMENTAL QUALIFIC | CATION REVIEW OF EQUIPMENT ITE | M NO. <u>19</u> |
| SUMMARY OF LICENSEE RESPONSES TO THE | NRC SER - ONLY CHECKED ITEMS ARE . | APPLICABLE: |
| The Licensee (has/has not) provid | led a response to the SER concerns. | |
| The Licensee (has/has not) specific qualified and/or will function when vironmental service conditions. | ically stated that the equipment is nen exposed to the applicable DBE | is |
| The Licensee has presented inform outstanding qualification deficie | nation which shows there are no encies. | |
| The Licensee (has/has not) propos item whose qualification has not | ed a corrective action for this ed been fully established. | quipment |
| Justification for interim ope Licensee for this equipment i | ration (has/has not) been provided.tem. | d by the |
| Corrective action specified b | by the Licensee: | |
| Equipment replacement with Equipment modification Equipment relocation above Relocate or shield equipm Verify qualification by a Equipment relocation to a | th qualified equipment we submergence level ment from radiation source additional (testing/analysis) | |
| Equipment relocation to a Qualification testing of | a mild environment | |

- Other (
- The Licensee has provided other information for this equipment item that can be construed as a basis for justification for interim operation.
- The Licensee (has/has not) provided a schedule for the proposed corrective action. (Schedule for accomplishing the corrective action _.)

The Licensee states that the equipment item does not require qualification and/or should be exempted from environmental qualification.

DESIGNATION OF RESULTANT NRC QUALIFICATION EVALUATION CATEGORY BASED ON REVIEW - CIRCLED ITEM ONLY: (See Section 3 of this TER for Legend)

I.a Qualified I.b Modification II.a Qualification Not Established II.b Not Qualified

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II.c Qualified Life Deficiency III.a Exempt [III.b] Not in Scope IV Documentation Not Available A Division of The Franklin Institute 20th and Race Streets. Phila... Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. _/9

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

| NRC REQUIREMENTS | = DEFICIENCY |
|--|--------------|
| Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Establish Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) | ahed |
| o Peak Temperature Adequate | |
| o Duration Adequate | |
| o Steam Exposure (If Required) Adequate | |
| Criteria Regarding Submergence Satisfied | |
| Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies | |
| (If Any) Satisfied Criteria Regarding Functional Testing Satisfied | |
| Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied | |
| Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I) | |

NRC QUALIFICATION CATEGORY

DESIGNATION: X = CATEGORY

| I.a | Equipment Qualified | |
|-------|---|----|
| I.b | Equipment Qualification Pending Modification | |
| II.a | Equipment Qualification Not Established | |
| II.b | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life or Replacement Schedule Justified | |
| III.a | Equipment Exempt From Qualification | |
| III.D | Equipment Not in the Scope of the Qualification Review | _X |
| VI | Documentation Not Made Available | |

MILD ENVIRONMENT

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A Division of The Franklin Institute 20th and Race Streets, Phila., Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 20

Equipment Item No. 20 Motors Located in Auxiliary Building Addition (Area #6) General Electric Type K, 250 hp Drive Standby Auxiliary Feedwater Pumps (Plant ID Not Stated) Licensee References 30 and 27 Required Operating Time: Long term TER Checksheet No. 20 Reference 59, Section 4.7.6 Licensee Submittal: Table 3, Page 4 [1]; FRC SCEW 27

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

| Not a | stat | ed, | Not applie Deferre | cable | |
|-------|------|-----|-----------------------|-------------|---|
| LIST | ING | OF | APPLICABLE | CHECKSHEETS | ; |

Contents

Checksheet Page No.

| Equipment Item | la | | | | | |
|---|------------|-----|----------|------|-----|----|
| Summary of Licensee Responses to the NRC SER | lb | | | | | |
| Equipment Environmental Qualification Summary Forms | 2 | | | | | |
| Licensee Response to NRC SER | 36, | 36, | 36. | 30 | | |
| System Consideration Review | 44, | 48, | 48, | 4d., | 42, | 45 |
| Equipment Environmental Qualification Review | 54, 59, | ××, | ×, ×, | ×, | ×, | ¥, |
| Installed TMI Lessons Learned Implementation Equipment Summary | 638. | 96 | | | | |
| Maintenance and Replacement Schedule Summary | 78. | 28. | 26 | | | |

| A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 | NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u> | Page Ib |
|---|--|------------|
| EQUIPMENT ENVIRONMENTAL QUALIFIC | CATION REVIEW OF EQUIPMENT ITEM | NO. 20 |
| SUMMARY OF LICENSEE RESPONSES TO THE | NRC SER - ONLY CHECKED ITEMS ARE APP | LICABLE: |
| The Licensee (has/has not) provide | ed a response to the SER concerns. | |
| The Licensee (has/has not) specif qualified and/or will function who environmental service conditions. | ically stated that the equipment is en exposed to the applicable DBE | |
| The Licensee has presented inform outstanding qualification deficies | ation which shows there are no ncies. | |
| The Licensee (has/has not) propose item whose qualification has not i | ed a corrective action for this e ui been fully established. | pment |
| Justification for interim ope Licensee for this equipment i | ration (has/has not) been provided b tem. | y the |
| Corrective action specified by | y the Licensee: | |
| Equipment replacement with Equipment modification Equipment relocation above Relocate or shield equipme Verify qualification by a Equipment relocation to a Qualification testing of Other (| h qualified equipment e submergence level ent from radiation source dditional (testing/analysis) mild environment equipment in progress |) |
| The Licensee has provided other that can be construed as a bas operation. | er information for this equipment it sis for justification for interim | em |
| The Licensee (has/has not) processes (has/has not) processes (schedule action.) | ovided a schedule for the proposed for accomplishing the corrective . |) |
| The Licensee states that the equi and/or should be exempted from en | pment item does not require qualific vironmental qualification. | ation |
| DESIGNATION OF RESULTANT NRC QUALIFIC - CIRCLED ITEM ONLY: (See Section 3 | ATION EVALUATION CATEGORY BASED ON R of this TER for Legend) | EVIEW |
| I.a Qualified I.b Modification II.a Qualification Not Established II.b Not Qualified | II.c Qualified Life Deficiency III.a Exempt III.D Not in Scope IV Documentation Not Available | |

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EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM DESIGNATION: X = DEFICIENCY NRC REQUIREMENTS Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 20

NRC QUALIFICATION CATEGORY

DESIGNATION: X = CATEGORY

| I.a | Equipment Qualified | |
|-------|--|---|
| I.b | Equipment Qualification Pending Modification | |
| II.a | Equipment Qualification Not Established | |
| II.b | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life | |
| | or Replacement Schedule Justified | |
| III.a | Equipment Exempt From Qualification | |
| d.III | Equipment Not in the Scope of the Qualification Review | X |
| IV | Documentation Not Made Available | |

MILD ENVIRONMENT

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 21

Equipment Item No. 21 Motors Located in Auxiliary Building (Area #2) Westinghouse 444 TS TBDP 200 hp Containment Spray Pump Motors (Plant ID Not Stated) Licensee References 604 and 605 Required Operating Time: Long term TER Checksheet No. 21 Reference 59, Section 4.7.7 Licensee Submittal: Page 14 [62]; Table 3, Page 4 [1]; FRC SCEW 29

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, KPS, None,

Not stated, Not applicable -deferred)

LISTING OF APPLICABLE CHECKSHEETS:

Checksheet Page No. Contents la Equipment Item Summary of Licensee Responses to the NRC SER 1b 2 Equipment Environmental Qualification Summary Forms 3a, 30, 3c, 3d Licensee Response to NRC SER ANG, ANG, ANG, ANG, ANG, ANG, ANG, System Consideration Review Sa, 36, 36, 36, 56, 5f, Equipment Envil mental Qualification Review 34, 5x, 51, 59 Installed TMI Lessons Learned Implementation \$6, 80 Equipment Summary 76, 76, 76 Maintenance and Replacement Schedule Summary

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NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

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| Ib |
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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 21

SUMMARY OF LICENSEE RESPONSES TO THE NRC SER - ONLY CHECKED ITEMS ARE APPLICABLE:

- The Licensee (has/has not) provided a response to the SER concerns.
- _____ 'The Licensee (has/has not) specifically stated that the equipment is qualified and/or will function when exposed to the applicalle DBE environmental service conditions.
- ____ The Licensee has presented information which shows there are no outstanding qualification deficiencies.
- ____ The Licensee (has/has not) proposed a corrective action for this equipment item whose qualification has not been fully established.
 - _____ Justification for interim operation (has/has not) been provided by the Licensee for this equipment item.
 - ____ Corrective action specified by the Licensee:
 - ____ Equipment replacement with qualified equipment
 - Equipment modification
 - Equipment relocation above submergence level
 - ____ Relocate or shield equipment from radiation source
 - ____ Verify qualification by additional (testing/analysis)
 - Equipment relocation to a mild environment
 - Qualification testing of equipment in progress
 - Other (____
 - The Licensee has provided other information for this equipment item that can be construed as a basis for justification for interim operation.
 - The Licensee (has/has not) provided a schedule for the proposed corrective action. (Schedule for accomplishing the corrective action .)
 - The Licensee states that the equipment item does not require qualification and/or should be exempted from environmental qualification.

DESIGNATION OF RESULTANT NRC QUALIFICATION EVALUATION CATEGORY BASED ON REVIEW - CIRCLED ITEM ONLY: (See Section 3 of this TER for Legend)

I.a Qualified I.b Modification II.a Qualification Not Established II.b Not Qualified

II.c Qualified Life Deficiency III.a Exempt (III.b) Not in Scope Ao+e#1 IV Documentation Not Available

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A Division of The Franklin Institute 20th and Race Streets. Phila.. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 21

EQUIPMEN'T ENVIRONMENTAL QUALIFICATION SUMMARY FORM

DESIGNATION: X = DEFICIENCY NRC REQUIREMENTS Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

NRC QUALIFICATION CATEGORY

DESIGNATION: X = CATEGORY

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| I.a | Equipment Qualified | |
|-------|---|---|
| I.b | Equipment Qualification Pending Modification | |
| II.a | Equipment Qualification Not Established | |
| II.b | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life or Replacement Schedule Justified | |
| III.a | Equipment Exempt From Qualification | |
| III.b | Equipment Not in the Scope of the Qualification Review | X |
| IV | Documentation Not Made Available | |

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MILD ENVIRONMENT

Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila. Pa 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

Page 3a

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 21

LICENSEE RESPONSE TO NRC SER

In item 4.7.7, various Westinghouse pumps motors are addressed. The Containment Spray, RHR, and Safety Injection pump motors could see a high radiation environment during the mitigation of a LOCA. This is a "harsh" environment; qualification of these pump motors should be reviewed for this parameter.

The other motors use PMR Class B insulation. As stated in Reference 2.69, these motors are qualified for 1 x 10 rads and an operating-life of 20 years. Since these motors see only intermittent service, an operational capability of 40 years is provided. These pump motors are also included in the maintenance/ surveillance program of Reference 72. We are not able to make this entire proprietary report available at this time. Salient facts have been transmitted in Reference 2.69; the report itself is available for audit at RG&E. A Division of The Franklin Institute 20th and Race Streets, Phila., Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 21

NOTES: Note 2: This equipment is nonhangh environment. Accident ina 100 mR/hu and 9 conclaccident) plus aging resistion doses Cat and less than 10 rd (yoy). In add materials ition the that are Susceptable to radiation degradation Se. an bu materia 1CP question shielded From recirculating Fluids his need not be considered.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 22

Equipment Item No. 22 Motors Located in Auxiliary Building (Area #2) Westinghouse 444 TS TBDP 150 hp Component Cooling Water Pump Motors (Plant ID Not Stated) Licensee References 604 and 605 Required Operating Time: Long term TER Checksheet No. 22 Reference 59, Section 4.7.7 Licensee Submittal: Page 14 [62]; Table 3, Page 4 [1]; FRC SCEW 28

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DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

Not stated, Not applicable-deferred)

LISTING OF APPLICABLE CHECKSHEETS:

| Contents | Chec | kshe | et I | Page | No. | | |
|--|-------------|-------------|----------|----------|-----|-----|--|
| Equipment Item | la | | | | | | |
| Summary of Licensee Responses to the NRC SER | lb | | | | | | |
| Equipment Environmental Qualification Summary Forms | 2 | | | | | | |
| Licensee Response to NRC SER | 3a, | <u>зк</u> , | £ | 38 | | | |
| System Consideration Review | 46. | * | Æ, | æ, | 46, | × | |
| Equipment Environmental Qualification Review | 9a, 59, | 58, 54, | ×, ×, | 9a, 첫 | 56, | 5£, | |
| Installed TMI Lessons Learned Implementation Equipment Summary | 94 , | 96 | | | | | |
| Maintenance and Replacement Schedule Summary | 74, | 76, | × | | | | |

Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>4.54</u>

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 22

SUMMARY OF LICENSEE RESPONSES TO THE NRC SER - ONLY CHECKED ITEMS ARE APPLICABLE: The Licensee (has/has not) provided a response to the SER concerns. The Licensee (has/has not) specifically stated that the equipment is qualified and/or will function when exposed to the applicable DBE environmental service conditions. The Licensee has presented information which shows there are no outstanding gualification deficiencies. The Licensee (has/has not) proposed a corrective action for this equipment item whose qualification has not been fully established. Justification for interim operation (has/has not) been provided by the Licensee for this equipment item. Corrective action specified by the Licensee: Equipment replacement with qualified equipment Equipment modification Equipment relocation above submergence level Relocate or shield equipment from radiation source Verify qualification by additional (testing/analysis) Equipment relocation to a mild environment Qualification testing of equipment in progress Other (The Licensee has provided other information for this equipment item that can be construed as a basis for justification for interim operation. The Licensee (has/has not) provided a schedule for the proposed corrective action. (Schedule for accomplishing the corrective action The Licensee states that the equipment item does not require qualification and/or should be exempted from environmental qualification. DESIGNATION OF RESULTANT NRC QUALIFICATION EVALUATION CATEGORY BASED ON REVIEW - CIRCLED ITEM ONLY: (See Section 3 of this TER for Legend) I.a Qualified II.c Qualified Life Deficiency I.b Modification III.a Exempt II.a Qualification Not Established (III.b) Not in Scope Note 1 II.b Not Qualified IV Documentation Not Available

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NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 22

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

| | DESIGNATION: |
|---|----------------|
| NAC REQUIREMENTS | X = DEFICIENCY |
| Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Establ: Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature & Adequate o Peak Pressure & Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Submergence Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Criteria Regarding Margin (I hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I) | ished |
| | |
| | DESIGNATION: |
| NRC QUALIFICATION CATEGORY | X = CATEGORY |
| I.a Equipment Qualified | |
| I.b Equipment Qualification Pending Modification | |
| II.a Equipment Qualification Not Established | |
| II.b Equipment Not Qualified | |
| II.c Equipment Satisfies All Requirements Except Qualified | Life |
| or Replacement Schedule Justified | |

- III.a Equipment Exempt From Qualification
- III.b Equipment Not in the Scope of the Qualification Review
- IV Documentation Not Made Available

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See page 5 f



NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 22

LICENSEE RESPONSE TO NRC SER

In item 4.7.7, various Westinghouse pumps motors are addressed. The Containment Spray, RHR, and Safety Injection pump motors could see a high radiation environment during the mitigation of a LOCA. This is a "harsh" environment; qualification of these pump motors should be reviewed for this parameter.

The other motors use PMR Class B insulation. As stated in Reference 2.69, these motors are qualified for 1 x 10 rads and an operating-life of 20 years. Since these motors see only intermittent service, an operational capability of 40 years is provided. These pump motors are also included in the maintenance/ surveillance program of Reference 72. We are not able to make this entire proprietary report available at this time. Salient facts have been transmitted in Reference 2.69; the report itself is available for audit at RG&E.

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NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13, FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 22

NOTES:

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| iote. | 1: This equipment is in a nonhangh environment. Accident |
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| | pluboping adjution despectation Plice adamada with |
| | - Freshing realered deses car 100 million and the accient |
| | and less than 10° rd (40 yr). In addition the materials |
| | that are susceptable to radiation related degradation |
| | are primarily affected by Bradiation. The motor |
| | and splice materials in question are sufficiently |
| | shielded From recirculation Fluids that this need - |
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Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 23

Equipment Item No. 23 Motors Located in Auxiliary Building (Area #2) Westinghouse 445 TS TBDP 200 hp RHR Pump Motors (Plant ID Not Stated) Licensee References 42, 604, and 605 Required Operating Time: Long term TER Checksheet No. 23 Reference 59, Section 4.7.7 Licensee Submittal: Page 14 [62]; Table 3, Page 4 [1]; FRC SCEW 30

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE MRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

Not stated, Not applicable - deferred)

LISTING OF APPLICABLE CHECKSHEETS:

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| Equipment Environmental Qualification Review | da, 59, | 916., 516., | 9e, 54, | 58. 39 | 54, | 5f, |
| Installed TMI Lessons Learned Implementation Equipment Summary | ō đ , | 6 | | | | |
| Maintenance and Replacement Schedule Summary | 74. | 76. | 7ć | | | |

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| FRC Assignment No. 13 |
| FRC Task No. 454 |

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 23

SUMMARY OF LICENSEE RESPONSES TO THE NRC SER - ONLY CHECKED ITEMS ARE APPLICABLE:

- The Licensee (has/has not) provided a response to the SER concerns.
- The Licensee (has/has ..ot) specifically stated that the equipment is qualified and/or will function when exposed to the applicable DBE environmental service conditions.
- ____ The Licensee has presented information which shows there are no outstanding qualification deficiencies.
- ____ The Licensee (has/has not) proposed a corrective action for this equipment item whose qualification has not been fully establ_oned.
 - _____ Justification for interim operation (has/has not) been provided by the . Licensee for this equipment item.
 - Corrective action specified by the Licensee:
 - Equipment replacement with qualified equipment
 - ____ Equipment modification
 - Equipment relocation above submergence level
 - ____ Relocate or shield equipment from radiation source
 - ____ Verify qualification by additional (testing/analysis)
 - Equipment relocation to a mild environment
 - ____ Qualification testing of equipment in progress
 - Other (
 - The Licensee has provided other information for this equipment item that can be construed as a basis for justification for interim operation.
 - The Licensee (has/has not) provided a schedule for the proposed corrective action. (Schedule for accomplishing the corrective action
- The Licensee states that the equipment item does not require qualification and/or should be exempted from environmental qualification.

DESIGNATION OF RESULTANT NRC QUALIFICATION EVALUATION CATEGORY BASED ON REVIEW - CIRCLED ITEM ONLY: (See Section 3 of this TER for Legend)

I.a Qualified I.b Modification II.a Qualification Not Established II.b Not Qualified

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II.c Qualified Life Deficiency III.a Exempt III.D Not in Scope note1 IV Documentation Not Available

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DESIGNATION: X = CATEGORY

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 23

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

DESIGNATION: X = DEFICIENCY NRC REQUIREMENTS Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

NRC QUALIFICATION CATEGORY

Equipment Qualified I.a Equipment Qualification Pending Modification I.b Equipment Qualification Not Established II.a _____ Equipment Not Qualified II.b Equipment Satisfies All Requirements Except Qualified Life II.c or Replacement Schedule Justified III.a Equipment Exempt From Qualification III.b Equipment Not in the Scope of the Qualification Review Documentation Not Made Available IV

MILD ENVIRONMENT

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20th and Race Strees. Phila. Pa. 19103 (215) 448-1000

NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 23

LICENSEE RESPONSE TO NRC SER

In item 4.7.7, various Westinghouse pumps motors are addressed. The Containment Spray, RHR, and Safety Injection pump motors could see a high radiation environment during the mitigation of a LOCA. This is a "harsh" environment; gualification of these pump motors should be reviewed for this parameter.

The other motors use PMR Class B insulation. As stated in_Reference 2.69, these motors are qualified for 1 x 10 rads and an operating-life of 20 years. Since these motors see only intermittent service, an operational capability of 40 years is provided. These pump motors are also included in the maintenance/ surveillance program of Reference 72. We are not able to make this entire proprietary report available at this time. Salient facts have been transmitted in Reference 2.69; the report itself is available for audit at RG&E. A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 23

NOTES: Note 1: This equipment is in a nonhangh environment. Accedent plus aging radiation doses (at 100 mR/hs and good accident) ane less than 104 rd (your). terials ition In that arg Susceptable to rad decradation ia tion B orimorely affected by are radio The motor and materia in question splice iciently are shielded from recirculating Fluids this need x not be considered.

Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 24

Equipment Item No. 24 Motors Located on Basement Level of Intermediate Building Westinghouse Type 505US ABDP, 250 hp Drive Auxiliary Feedwater Pumps (Plant ID Not Stated) Licensee References 42 and 604 Required Operating Time: Long term TER Checksheet No. 24 Reference 59, Section 4.6.2 Licensee Submittal: Table 3, Page 5 [1]; FRC SCEW 31

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER ~ CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

Not stated, Not applicable

LISTING OF APPLICABLE CHECKSHEETS:

| concents | cned | KSN | et i | rage | NO. | | |
|---|------------|------------|------------|------|-----|------------|--|
| Equipment Item | la | | | | | | |
| Summary of Licensee Responses to the NRC SER | lb | | | | | | |
| Equipment Environmental Qualification Summary Forms | 2 | | | | | | |
| Licensee Response to NRC SER | 3a, | 316., | 3%, | 3/2 | | | |
| System Consideration Review | 4a, | 4b, | 48. | 48. | 40. | 4 £ | |
| Equipment Environmental Qualification Review | 54, 99, | 78, 36, | s≈, s¥, | ×, | ₩, | ×, | |
| Installed TMI Lessons Learned Implementation Equipment Summary | dá. | \$6 | | | | | |
| Maintenance and Replacement Schedule Summary | ta, | 26, | * | | | | |

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NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

| EQUIPMENT | ENVIRONMENTAL | QUALIFICATION | REVIEW OF | EQUIPMENT | ITEM NO. 2 | Ч |
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| MMARI OF LICENSEE RESPONSES TO THE N | RC SER - ONLY CHECKED ITEMS ARE APPLICAD |
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| The Licensee (has/has not) provide | d a response to the SER concerns. |
| The Licensee (has/has not) specifi qualified and/or will function whe environmental service conditions. | cally stated that the equipment is n exposed to the applicable DBE |
| The Licensee has presented informa outstanding qualification deficien | tion which shows there are no cies. |
| The Licensee (has/has not) propose item whose qualification has not b | d a corrective action for this equipment een fully established. |
| Justification for interim oper Licensee for this equipment it | ation (has/has not) been provided by the em. |
| Corrective action specified by | the Licensee: |
| Equipment replacement with Equipment modification | qualified equipment |
| Equipment relocation above | submergence level |
| Relocate or shield equipme | ent from radiation source |
| Verify qualification by ad | ditional (testing/analysis) |
| Equipment relocation to a | mild environment |
| Other (| Automent in progress |
| | ······································ |
| The Licensee has provided othe that can be construed as a bas operation. | er information for this equipment item sis for justification for interim |
| The Licensee (has/has not) pro corrective action. (Schedule action | for accomplishing the corrective .) |
| X The Licensee states that the equip and/or should be exempted from env | pment item does not require qualification vironmental qualification. |
| ESIGNATION OF RESULTANT NRC QUALTRICK | ATION EVALUATION CATEGORY BASED ON DEVIES |
| CIRCLED ITEM ONLY: (See Section 3 of | of this TER for Legend) |
| .a Qualified | II.c Qualified Life Deficiency |
| .b Modification | (III.) Exempt |
| I.a Qualification Not Established | III.b Not in Scope |
| I.b Not Qualified | IV Documentation Not Available |
| | |

Franklin Research Center A Division of The Franklin Institute 20th and Race Streets, Phila., Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 24

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

DESIGNATION: X = DEFICIENCY

NRC REQUIREMENTS

Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

NRC QUALIFICATION CATEGORY

DESIGNATION: X = CATEGORY

| I.a | Equipment Qualified | |
|-------|---|-----|
| I.b | Equipment Qualification Pending Modification | |
| II.a | Equipment Qualification Not Established | |
| lI.b | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life or Replacement Schedule Justified | |
| III.a | Equipment Exempt From Qualification | _X_ |
| III.D | Equipment Not in the Scope of the Qualification Review | |
| IV | Documentation Not Made Available | |
NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 24

LICENSEE RESPONSE TO NRC SER

Item 4.6.2 addresses the auxiliary feedwater pumps. As noted in item E.1 of Appendix E, FRC had concluded that the present configuration of the auxiliary feedwater system is not satisfactory. As noted earlier in this letter (#12), the NRC has consistently reviewed and approved this system.

RG&E also provided an evaluation to determine if the Class IE AFW circuits could be degraded by an HELB in the intermediate building, thus negating the operability of the Standby AFW system. This was provided in a letter from John E. Maier, RG&E, to Dennis M. Crutchfield, NRC, dated December 15, 1980. This evaluation concluded that no degradation would occur.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 24

SYSTEM CONSIDERATION REVIEW

The Licensee has stated that this equipment item does not require environmental qualification and/or should be exempted from qualification. The Licensee's rationale has been evaluated and the reasons for concurrence/ non-concurrence with the technical basis of the Licensee's position are presented below.

Reason for Concurrence

e

- Equipment does not provide a accident. Equipment Environmental Qualification is not required by the DOR Guide-lines. (NRC Qualification Evaluation Category IIIa)
- Equipment is not exposed to a harsh environment by the accident it is intended to mitigate. See note (1) on page 4b. (NRC Qualification Evaluation Category IIIb)
- X Backup (equipment/system) is available which completely performs the safety function. The backup (equipment/system) is environmentally qualified and appears to meet single active failure criterion. See note (1) ____ Requirement for continued functionon page 4b. (NRC Qualification Evaluation Category IIIa)

Reason for Non-Concurrence

- Equipment does not provide a _____ Backup (equipment/system) is not safety function or mitigate the fully capable of performing the consequences of a design basis intended safety function or accident mitigating function.
 - Backup (equipment/system) is not environmentally qualified and can be exposed to a hostile environment simultaneously with the primary equipment.
 - _ Backup (equipment/system) is subject to a potentially disabling single active failure.
 - ____ Failure of the primary equipment can compromise the ability of other safety-related equipment to perform its specified safety function.
 - Failure of the primary equipment can result in erroneous indication which could mislead an operator.
 - ing throughout the post-accident period necessitates environmental qualification.

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EQUIPMENT ENVIRONMENTA _ QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 24

Reason for Concurrence

The equipment's accident mitigating function is completed prior to the onset of the hostile environment. No subsequent functions are necessary. See note (1) below. (NRC Qualification Evaluation Category IIIb)

Other (see page___)

- Resultant NRC Qualification Evaluation Category (IIIa/IIIb)
- X Note 1: The Licensee (has/ has not) stated that failure of the primary equipment will not affect other safety-related equipment or cause an operator to be misled. (See page 3 A _)

LICENSEE STATEMENT

See page 3a of this checksheet.

EVALUATION OF LICENSEE STATEMENT

See the Evaluation of AFW System equipment provided on pages 4b through 4f of Equipment Item No. 15 to this report.

Reason for Non-Concurrence

The equipment's accident mitigating function is completed prior to the onset of the hostile environment. No subsequent Although backup equipment is available, it is not technically sound to relinquish defense-in-depth for this function.

- Backup (equipment/system) is not safety-related.
- This equipment is necessary for the operator to ensure an ESF system is performing its intended safety function.
- The rationale presented by the Licensee is not supported by objective technical evidence.

___ Other (see page___)

Page

ONT V.

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 25

Equipment Item No. 25 Motors Located in the Auxiliary Building (Area #3) Westinghouse 509 US AFDP 350 hp Safety Injection Pump Motors (Plant ID Not Stated) Licensee References 42 and 604 Required Operating Time: Long term TER Checksheet No. 25 Reference 59, Section 4.7.7 Licensee Submittal: Page 14 [62]; Table 3, Page 5 [1]; FRC SCEW 32

| DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER | - CIP | CLEI | 111 | m(3) | ONL | |
|--|-------|------------|-------|-----------|-------|-----|
| (See Section 3 of this TER for Legend) | | | | | | |
| R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN | , SEN | i, Q1 | , RP | s, N | lone, | |
| Not stated, Not applicable deferred | | | | | | |
| LISTING OF APPLICABLE CHECKSHEETS: | | | | | | |
| Contents | Chec | kshe | eet H | age | No. | |
| Equipment Item | la | | | | | |
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| Equipment Environmental Qualification Summary Forms | 2 | | | | | |
| Licensee Response to NRC SER | 3a, | 316, | 307 | 312 | | |
| System Consideration Review | 42. | ×. | ×, | ₩, | ж, | 4€ |
| Equipment Environmental Qualification Review | 58. | 38, 56, | 5¢. | 58. 54 | 5¢., | 5f, |
| Installed TMI Lessons Learned Implementation Equipment Summary | ðæ, | 66 | | | | |
| Maintenance and Replacement Schedule Summary | ×. | 龙, | te | | | |

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Page 1b

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 25

| _ The Lie | censee (has/has no | t) provided | a respon | se to the SE | IR concerns. | |
|--|--|--|---|---|---|--------|
| The Lie qualif enviro | censee (has/has no ied and/or will fu nmental service co | ot) specific inction when onditions. | ally stat exposed | ed that the to the appli | equipment is cable DBE | |
| The Lie outsta | censee has present nding qualificatio | ed informat | ion which ies. | shows there | are no | |
| _ The Li item w | censee (has/has no hose qualification |) proposed has not be | a correc en fully | tive action established. | for this equi | lpment |
| Ju | stification for in censee for this eq | iterim opera juipment ite | tion (has m. | /has not) be | en provided b | by the |
| Co | rrective action sp | ecified by | the Licen | see: | | |
| | Equipment replac Equipment modifi Equipment reloca Relocate or shie Verify qualifica Equipment reloca Qualification te | ement with cation tion above d equipmen tion by add tion to a m esting of eq | qualified submergen t from ra litional (ild envir uipment i | equipment ce level diation sour testing/anal onment n progress | ce ysis) | |
| The the open of th | e Licensee has pro at can be construe eration. e Licensee (has/ha | vided other d as a basi as not) prov | informat s for jus | ion for this tification f hedule for t | equipment it or interim he proposed | .em |
| ac | tion | (Schedule 1 | or accomp | lisning the | |) |
| The Li and/or | censee states that should be exempte | the equipm d from envi | ent item ronmental | does not req qualificati | uire qualific on. | ation |
| SIGNATIO CIRCLED | N OF RESULTANT NRO ITEM ONLY: (See S | QUALIFICAT Section 3 of | ION EVALU | ATION CATEGO for Legend) | RY BASED ON R | EVIEW |
| a Quali | fied ication | | II.c Qu III.a Ex | alified Life empt | Deficiency | |

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| UIPMEN | T ENVIRONMENTAL QUALIFICATI | ON REVIEW OF EQUIP | MENT ITEM NO. 2 |
|-----------|--|-------------------------|---------------------|
| | | | |
| | EQUIPMENT ENVIRONMENTAL QUI | LIFICATION SUMMARY FO | RM |
| | | | DESIGNATION: |
| RC REQUI | REMENTS | | X = DEFICIENCY |
| ocumente | d Evidence of Qualification Adec | quate | 10 - 10 <u>- 10</u> |
| dequate | Similarity Between Equipment and | d Test Specimer Establ | ished |
| ging Deg | radation Evaluated Adequately | | |
| ualified | Life or Replacement Schedule En | stablished (If Require | (b) |
| Program E | stablished to Identify Aging Dec | gradation | |
| Criteria | Regarding Aging Simulation Satis | sfied (If Required) | |
| Criteria | Regarding Temperature/Pressure 1 | Exposure: | |
| o Pe | ak Temperature Adequate | | |
| o Pe | ak Pressure Adequate | | |
| o Du | ration Adequate | | |
| o Re | quired Profile Enveloped Adequa | tely | |
| o St | eam Exposure (If Required) Adeq | uate | |
| Criteria | Regarding Spray Satisfied | | |
| Criteria | Regarding Submergence Satisfied | | |
| Criteria | Regarding Radiation Satisfied | | |
| Criteria | Regarding Test Sequence Satisfi | ed | |
| Criteria | Regarding Test Failures or Seve | re Anomalies | |
| (If Any | r) Satisfied | | |
| Criteria | Regarding Functional Testing Sa | tistied | |
| Criteria | Regarding Instrument Accuracy S | atisfied | |
| Test Dura | ition Margin (1 nour + Function | Time) Satisfied | |
| Criteria | Regarding Margins Satisfied (NO | REG-0588, Cat. 1) | |
| | | | DESIGNATION: |
| NRC QUAL | FICATION CATEGORY | | X = CATEGORY |
| I.a I | Equipment Qualified | | |
| I.b | Equipment Qualification Pending | Modification | |
| II.a | Equipment Qualification Not Esta | blished | |
| II.b | Equipment Not Qualified | | |
| II.c | Equipment Satisfies All Requirem or Replacement Schedule Justifie | ents Except Qualified | Life |
| III.a | Equipment Exempt From Qualificat | ion | |
| III.D | Equipment Not in the Scope of th | ne Qualification Review | w X |
| IV | Documentation Not Made Available | | |

MILD ENVIRONMENT

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3a

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 25

LICENSEE RESPONSE TO NRC SER

In item 4.7.7, various Westinghouse pumps motors are addressed. The Containment Spray, RHR, and Safety Injection pump motors could see a high radiation environment during the mitigation of a LOCA. This is a "harsh" environment; qualification of these pump motors should be reviewed for this parameter.

As properly pointed out by FRC, the Safety Injection pump motor is wound with Westinghouse Thermalastic Epoxy, and is qualified for a radiation environment by WCAP-8754. The effects of Mobilux lubricant on the bearing system will be evaluated, among other things, by inclusion in the maintenance/surveillance program of Reference 72.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 25

NOTES: Note 1: This equipment is in a nonhandh environment. Accedent plus aging radiation doses (at 100 mR/he adopted accident) and less than 10th (40yn). In addition the materials that are Susceptable to radiation dearadation NO. en B are Ffected imarely by 10 he moto and in question splice moto are SUF \$ icien From recirculating Fluids shielded this need not be considered.



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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 26

Equipment Item No. 26 Motors Located in Screen House (Area #5) Westinghouse 509 UPH ABDP, 300 hp Drive Service Water Pumps (Plant ID Not Stated) Licensee Reference 42 Required Operating Time: Long term TER Checksheet No. 26 Reference 59, Section 4.7.8 Licensee Submittal: Table 3, Page 5 [1]; FRC SCEW 33

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend) R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None, Not stated, Not applicable deferred LISTING OF APPLICABLE CHECKSHEETS: Checksheet Page No. Contents la Equipment Item Summary of Licensee Responses to the NRC SER 1b Equipment Environmental Qualification Summary Forms 2 34, 36, 36, 36 Licensee Response to NRC SER 松, 秋, 秋, 松, 秋, 秋, System Consideration Review 34, 96, 90, 90, 96, 96, 96, Equipment Environmental Qualification Review 39, 30, 52, 53 Installed TMI Lessons Learned Implementation 62, 60 Equipment Summary

Maintenance and Replacement Schedule Summary

Ta, Ta, 75

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 26

SUMMARY OF LICENSEE RESPONSES TO THE NRC SER - ONLY CHECKED ITEMS ARE APPLICABLE:

- The Licensee (has/has not) provided a response to the SER concerns.
- The Licensee (has/has not) specifically stated that the equipment is qualified and/or will function when exposed to the applicable DBE environmental service conditions.
- The Licensee has presented information which shows there are no outstanding gualification deficiencies.
- The Licensee (has/has not) proposed a corrective action for this equipment item whose qualification has not been fully established.
 - _____Justification for interim operation (has/has not) been provided by the Licensee for this equipment item.
 - ____ Corrective action specified by the Licensee:
 - Equipment replacement with qualified equipment
 - Equipment modification
 - Equipment relocation above submergence level
 - Relocate or shield equipment from radiation source
 - Verify qualification by additional (testing/analysis)
 - Equipment relocation to a mild environment
 - ____ Qualification testing of equipment in progress
 - Other (

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- The Licensee has provided other information for this equipment item that can be construed as a basis for justification for interim operation.
- The Licensee (has/has not) provided a schedule for the proposed corrective action. (Schedule for accomplishing the corrective action
- ____ The Licensee states that the equipment item does not require qualification and/or should be exempted from environmental qualification.

DESIGNATION OF RESULTANT NRC QUALIFICATION EVALUATION CATEGORY BASED ON REVIEW - CIRCLED ITEM ONLY: (See Section 3 of this TER for Legend)

I.a Qualified I.b Modification II.a Qualification Not Established II.b Not Qualified II.c Qualified Life Deficiency III.a Exempt (III.b) Not in Scope IV Documentation Not Available

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NRC QUALIFICATION CATEGORY

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 26

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

DESIGNATION: X = DEFICIENCY NRC REQUIREMENTS Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adaquate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

DESIGNATION: X = CATEGORY

| I.a | Equipment Qualified | |
|-------|--|-----|
| I.b | Equipment Qualification Pending Modification | |
| II.a | Equipment Qualification Not Established | |
| II.b | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life | |
| | or Replacement Schedule Justified | |
| III.a | Equipment Exempt From Qualification | |
| III.D | Equipment Not in the Scope of the Qualification Review | _X_ |
| IV | Documentation Not Made Available | |
| | | |

NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. _____454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 27

Equipment Item No. 27 (TMI Action Plan Item) Motor Located Inside Containment (Area #1) Westinghouse Model TEFC 2-hp, 3-phase, 60-Hz, 230/460-V Drives Hydrogen Recombiner Blower (Plant ID Not Stated) Licensee References 40, 585, 637, and 639 Required Operating Time: Long term TER Checksheet No. 27 Reference 59, Section 4.7.3 Licensee Submittal: Page 14 [62]; Table 3, Page 11 [1]; FRC SCEW 65

R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

Not stated, Not applicable deferred)

LISTING OF APPLICABLE CHECKSHEETS:

| concents | - Chie c | A DIIG | | ugo | | |
|---|-------------|------------|------------|-----|-----|-----|
| Equipment Item | la | | | | | |
| Summary of Licensee Responses to the NRC SER | lb | | | | | |
| Equipment Environmental Qualification Summary Forms | 2 | | | | | |
| Licensee Response to NRC SER | 3a, | 38, | 38, | Xa | | |
| System Consideration Review | 46, | 438, | 44. | 48, | 40. | 4£ |
| Equipment Environmental Qualification Review | 5a, \$9, | 5b, 51. | 5c, 51, | 5d, | 5e, | 5f, |
| Installed TMI Lessons Learned Implementation Equipment Summary | 6a, | ġК | | | | |
| Maintenance and Replacement Schedule Summary | 70. | 20, | × | | | |

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| Tenc | | |
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| EQUIPMENT ENVIRONMENTA | QUALIFICATION REVIEW | OF EQUIPMENT ITEM NO. | 27 |
|------------------------|----------------------|-----------------------|----|
|------------------------|----------------------|-----------------------|----|

| SUMMARY OF LICENSEE RESPONSES TO THE NE | C SER - ONLY CHECKED ITEMS ARE APPLICABLE: |
|---|---|
| The Licensee (has/has not) provided | a response to the SER concerns. |
| The Licensee (has/has not) specific qualified and/or will function when environmental service conditions. | cally stated that the equipment is a exposed to the applicable DBE |
| X The Licensee has presented informat outstanding qualification deficience | tion which shows there are no ties. |
| X The Licensee (has/has not) proposed item whose qualification has not be | d a corrective action for this equipment een fully established. |
| Justification for interim opera Licensee for this equipment ite | ation (has/has not) been provided by the em. |
| X Corrective action specified by | the Licensee: |
| Equipment replacement with Equipment modification | qualified equipment |
| Relocate or shield equipment | nt from radiation source |
| Verify qualification by ad | ditional (testing/analysis) |
| Oualification testing of e | quipment in progress |
| X Other (IF motor to lea Splices will be re | placed with qualified Raychem Sleeves. |
| The Licensee has provided othe that can be construed as a bas operation. | r information for this equipment . em is for justification for interim |
| X The Licensee (has/mas not) pro corrective action. (Schedule action during the Spring | tor accomplishing the corrective |
| The Licensee states that the equip and/or should be exempted from env | ment item does not require qualification ironmental qualification. |
| DESIGNATION OF RESULTANT NRC QUALIFICA | TION EVALUATION CATEGORY BASED ON REVIEW |
| - CIRCLED ITEM ONLY: (See Section 3 of | of this TER for Legend) |
| I.a Qualified | (I.c) Qualified Life Deficiency |
| I.b Modification | III.a Exempt |
| II.a Qualification Not Established II.b Not Qualified | IV Documentation Not Available |
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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 27

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

DESIGNATION: X = DEFICIENCY

NRC REQUIREMENTS

Documented Evidence of Qualif. cation Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

NRC QUALIFICATION CATEGORY

DESIGNATION: X = CATEGORY

| I.a | Equipment Qualified | |
|-------|---|----|
| I.b | Equipment Qualification Pending Modification | |
| II.a | Equipment Qualification Not Established | |
| II.b | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life or Replacement Schedule Justified | _X |
| III.a | Equipment Exempt From Qualification | |
| III.D | Equipment Not in the Scope of the Qualification Review | |
| IV | Documentation Not Made Available | |
| | | |



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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 27

LICENSEE RESPONSE TO NRC SER

Items 4.7.3 and 4.7.18 address portions of the Hydrogen Recombiner unit. This is a "TMI-related" item; however, deferral of review is not necessary, since the unit is already installed. The FRC review directed that an overall life of the motor should be established, and that a review of the motor's bearing, splices, and lubrication system should be made. Based on the intermittent use of the recombiner, a 40-year life would be expected. However, period maintenance and surveillance, per Reference 72, will account for putential failures, including age-related causes. AS for the lead-to-cable splice, Westinghouse has noted that the information in Reference 2.64 is applicable. At the next scheduled refueling shutdown of Spring 1982, RG&E will verify that the proper splice material was used. If not, the splices will be replaced with qualified Raychem sleeves.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 27

Checksheets 5a Three 5f have been removed due to the

proprietary nature of information contained therein.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 27

INSTALLED TMI LESSONS LEARNED IMPLEMENTATION EQUIPMENT SUMMARY

NRC requested an evaluation of the environmental qualification of safetyrelated electrical equipment located in harsh environments required for TMI Lessons Learned Implementation. The objective is to evaluate qualification documentation of equipment within the scope of IE Bulletin 79-01B, Supplement 3 (item 2), in accordance with criteria established by the NRC (see Section 2 of this report) in a manner identical to the evaluation of all other safetyrelated electrical equipment. The scope of this review is limited to TMI Action Plan equipment associated with specific sections of NUREG-0737 which have an installation implementation date of January 1, 1981 (sections are identified below). Where applicable, a review is to be performed on installed equipment with implementation dates after January 1, 1981 if adequately identified by the licensee.

With respect to this equipment item, it is noted (applicable section checked):

- The Licensee does not provide adequate information with respect to identification of TMI Action Plan equipment installed as of 1/1/81.
- The Licensee has not provided the correlation of this equipment item with the specific sections of NUREG-0737. [The correlation is needed to ensure that all items are included in the review, e.g., if a transmitter is identified as a TMI Action Plan item, are the cable and the terminal blocks associated with the device also identified?]
- The Licensee has not provided the approximate installation date for the TMI Action Plan equipment items so that the appropriate qualification criteria (NUREG-0588 or DOR (lidelines) can be used in the EEQ evaluation.
- ____ The Licensee has provided a standard Owners' Group position with respect to a NUREG-0737 technical area.
- ____ The Licensee has requested extensions of implementation dates.
- The Licensee has stated that this equipment item is associated with the following section of NUREG-0737. (This list of applicable NUREG-0737 sections has been identified by NRC as sections within the scope of this review):
 - ____ II.B.3 (ALL/1-1-81) Post-Accident Sampling Capability of Reactor Coolant and Containment
 - ____ II.D.3 (ALL/1-1-81) Direct Indication of Relief and Safety Valve Position

* Required by NUREG-0578 metrin 2.1.5.C

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 27

MAINTENANCE AND REPLACEMENT SCHEDULE SUMMARY

The following information regarding the maintenance and replacement schedule(s) for components, sub-components, and materials has been provided by the Licensee.

The motor to lead splices will be inspected. If the splices are found to be atype that is not qualified they will be replaced with qualified Raychum Sleeves.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 28

Equipment Item No. 28 Motors Located in Auxiliary Building (Area #2) U.S. Electrical Motors Model VEU, 100 hp Frame 84-445U, Class B Insulation Drive Charging Pumps (Plant ID Not Stated) Licensee reference not cited Required Operating Time: Long term TER Checksheet No. 28 Reference 59, Section 4.7.16 Licensee Submittal: Table 3, Page 11 [1]; FRC SCEW 66

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

Not stated, Not applicable deferred

LISTING OF APPLICABLE CHECKSHEETS:

Checksheet Page No. Contents Equipment Item la Summary of Licensee Responses to the NRC SER 1b Equipment Environmental Qualification Summary Forms 2 36, 36, 36, 30 Licensee Response to NRC SER 独, 斑, 斑, 斑, 斑, 妖, 妖 System Consideration Review Equipment Environmental Qualification Review 34, 30, 34, 32 \$6, \$6 Installed TMI Lessons Learned Implementation Equipment Summary 74, 76, 26 Maintenance and Replacement Schedule Summary

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 28

| <pre>SUMMARY OF LICENSEE RESPONSES TO THE NRC SER - ONLY CHECKED ITEMS ARE APPL _ The Licensee (has/has not) provided a response to the SER concerns The Licensee (has/has not) specifically stated that the equipment is qualified and/or will function when exposed to the applicable DBE environmental service conditions The Licensee has presented information which shows there are no outstanding qualification deficiencies The Licensee (has/has not) proposed a corrective action for this equip item whose qualification has not been fully established Justification for interim operation (has/has not) been provided by Licensee for this equipment item Corrective action specified by the Licensee: _ Equipment replacement with qualified equipment _ Equipment modification _ Equipment relocation above submergence level Relocate or shield equipment from radiation source _ Verify qualification to a mild environment _ Qualification testing of equipment in progress _ Other (</pre> | <u>ICABI</u> ment |
|---|----------------------|
| The Licensee (has/has not) provided a response to the SER concerns. The Licensee (has/has not) specifically stated that the equipment is qualified and/or will function when exposed to the applicable DBE environmental service conditions. The Licensee has presented information which shows there are no outstanding qualification deficiencies. The Licensee (has/has not) proposed a corrective action for this equip item whose qualification has not been fully established. Justification for interim operation (has/has not) been provided by Licensee for this equipment item. Corrective action specified by the Licensee: Equipment replacement with qualified equipment Equipment relocation above submergence level Relocate or shield equipment from radiation source Verify qualification to a mild environment Qualification testing of equipment in progress Other (The Licensee has provided other information for this equipment ite that can be construed as a basis for justification for interim operation. The Licensee (has/has not) provided a schedule for the proposed corrective action. (Schedule for accomplishing the corrective | ment |
| The Licensee (has/has not) provided a response to the SER concerns. The Licensee (has/has not) specifically stated that the equipment is qualified and/or will function when exposed to the applicable DBE environmental service conditions. The Licensee has presented information which shows there are no outstanding qualification deficiencies. The Licensee (has/has not) proposed a corrective action for this equip item whose qualification has not been fully established. Justification for interim operation (has/has not) been provided by Licensee for this equipment item. Corrective action specified by the Licensee: Equipment replacement with qualified equipment Equipment relocation above submergence level Relocate or shield equipment from radiation source Verify qualification to a mild environment Qualification testing of equipment in progress Other (| ment |
| The Licensee (has/has not) provided a response to the SER concerns. The Licensee (has/has not) specifically stated that the equipment is qualified and/or will function when exposed to the applicable DBE environmental service conditions. The Licensee has presented information which shows there are no outstanding qualification deficiencies. The Licensee (has/has not) proposed a corrective action for this equip item whose qualification has not been fully established. Justification for interim operation (has/has not) been provided by Licensee for this equipment item. Corrective action specified by the Licensee: Equipment replacement with qualified equipment Equipment relocation above submergence level Relocate or shield equipment from radiation source Verify qualification to a mild environment Qualification testing of equipment in progress Other (| ment |
| The Licensee (has/has not) specifically stated that the equipment is qualified and/or will function when exposed to the applicable DBE environmental service conditions. The Licensee has presented information which shows there are no outstanding qualification deficiencies. The Licensee (has/has not) proposed a corrective action for this equip item whose qualification has not been fully established. Justification for interim operation (has/has not) been provided by Licensee for this equipment item. Corrective action specified by the Licensee: Equipment replacement with qualified equipment Equipment relocation above submergence level Relocate or shield equipment from radiation source Verify qualification to a mild environment in progress Other (The Licensee has provided other information for this equipment ite that can be construed as a basis for justification for interim operation. The Licensee (has/has not) provided a schedule for the proposed corrective action. | ment |
| <pre></pre> | ment |
| <pre>environmental service conditions. The Licensee has presented information which shows there are no outstanding qualification deficiencies. The Licensee (has/has not) proposed a corrective action for this equip item whose qualification has not been fully established. Justification for interim operation (has/has not) been provided by Licensee for this equipment item. Corrective action specified by the Licensee: Equipment replacement with qualified equipment Equipment relocation above submergence level Relocate or shield equipment from radiation source Verify qualification to a mild environment Qualification testing of equipment in progress Other (</pre> | ment |
| The Licensee has presented information which shows there are no outstanding qualification deficiencies. The Licensee (has/has not) proposed a corrective action for this equip item whose qualification has not been fully established. | ment |
| The Licensee has presented information which shows there are no outstanding qualification deficiencies. The Licensee (has/has not) proposed a corrective action for this equip item whose qualification has not been fully established. Justification for interim operation (has/has not) been provided by Licensee for this equipment item. Corrective action specified by the Licensee: Equipment replacement with qualified equipment Equipment modification Equipment relocation above submergence level Relocate or shield equipment from radiation source Verify qualification to a mild environment Qualification testing of equipment in progress Other (| ment |
| <pre>outstanding qualification deficiencies The Licensee (has/has not) proposed a corrective action for this equip item whose qualification has not been fully established Justification for interim operation (has/has not) been provided by Licensee for this equipment item Corrective action specified by the Licensee: _ Equipment replacement with qualified equipment Equipment modification _ Equipment relocation above submergence level Relocate or shield equipment from radiation source _ Verify qualification by additional (testing/analysis) _ Equipment relocation to a mild environment _ Qualification testing of equipment in progress _ Other (</pre> | ment |
| The Licensee (has/has not) proposed a corrective action for this equip item whose qualification has not been fully established. Justification for interim operation (has/has not) been provided by Licensee for this equipment item. Corrective action specified by the Licensee: Equipment replacement with qualified equipment Equipment modification Equipment relocation above submergence level Relocate or shield equipment from radiation source Verify qualification by additional (testing/analysis) Equipment relocation to a mild environment Qualification testing of equipment in progress Other (| ment |
| <pre>item whose qualification has not been fully established. </pre> | |
| <pre></pre> | |
| Justification for interim operation (has/has not) been provided by Licensee for this equipment item. Corrective action specified by the Licensee: Equipment replacement with qualified equipment Equipment modification Equipment relocation above submergence level Relocate or shield equipment from radiation source Verify qualification by additional (testing/analysis) Equipment relocation to a mild environment Qualification testing of equipment in progress Other (| 7.52 |
| <pre>Licensee for this equipment item. Corrective action specified by the Licensee: Equipment replacement with qualified equipment Equipment modification Equipment relocation above submergence level Relocate or shield equipment from radiation source Verify qualification by additional (testing/analysis) Equipment relocation to a mild environment Qualification testing of equipment in progress Other (</pre> | the |
| <pre> Corrective action specified by the Licensee: Equipment replacement with qualified equipment Equipment modification Equipment relocation above submergence level Relocate or shield equipment from radiation source Verify qualification by additional (testing/analysis) Equipment relocation to a mild environment Qualification testing of equipment in progress Other (</pre> | |
| <pre>Equipment replacement with qualified equipment Equipment modification Equipment relocation above submergence level Relocate or shield equipment from radiation source Verify qualification by additional (testing/analysis) Equipment relocation to a mild environment Qualification testing of equipment in progress Other (</pre> | |
| <pre>Equipment replacement with qualified equipment Equipment modification Equipment relocation above submergence level Relocate or shield equipment from radiation source Verify qualification by additional (testing/analysis) Equipment relocation to a mild environment Qualification testing of equipment in progress Other (</pre> | |
| <pre>Equipment modification Equipment relocation above submergence level Relocate or shield equipment from radiation source Verify qualification by additional (testing/analysis) Equipment relocation to a mild environment Qualification testing of equipment in progress Other (</pre> | |
| <pre>Equipment relocation above submergence level Relocate or shield equipment from radiation source Verify qualification by additional (testing/analysis) Equipment relocation to a mild environment Qualification testing of equipment in progress Other (</pre> | |
| <pre></pre> | |
| <pre> Equipment relocation to a mild environment Qualification testing of equipment in progress Other (</pre> | |
| Qualification testing of equipment in progress Other (| |
| Other (| |
| The Licensee has provided other information for this equipment ite that can be construed as a basis for justification for interim operation. The Licensee (has/has not) provided a schedule for the proposed corrective action. (Schedule for accomplishing the corrective |) |
| | m |
| <pre>operation The Licensee (has/has not) provided a schedule for the proposed corrective action. (Schedule for accomplishing the corrective</pre> | |
| The Licensee (has/has not) provided a schedule for the proposed corrective action. (Schedule for accomplishing the corrective | |
| The Licensee (has/has not) provided a schedule for the proposed corrective action. (Schedule for accomplishing the corrective | |
| corrective action. (Schedule for accomplianing the corrective | |
| action | ÷ . |
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| The Licensee states that the equipment item does not require qualification | ation |
| and/or should be exempted from environmental qualification. | |
| ESTENATION OF RESILITANT NRC OHALTEICATION EVALUATION CATEGORY BASED ON R | EVTEW |
| CIRCLED ITEM ONLY: (See Section 3 of this TER for Legend) | TA T FILE |
| | |
| .a Qualified II.c Qualified Life Deficiency | |
| .b Modification III.a Exempt | |
| I.a Qualification Not Established (III.b) Not in Scope | |
| I.D NOT QUALIFIED IV DOCUMENTATION NOT AVAILABLE | |

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 28

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

DESIGNATION: X = DEFICIENCY NRC REQUIREMENTS Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

NRC QUALIFICATION CATEGORY

DESIGNATION: X = CATEGORY

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MILD ENVIRONMENT

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 29

Equipment Item No. 29 Motors Located in Auxiliary Building (Area #2) Westinghouse Model SBDP, 2 hp, Class B Insulation Drive Cooling Fans for RHR Pump Motors (Plant ID Not Stated) Licensee Reference 605 Required Operating Time: Long term TER Checksheet No. 29 Reference 59, Section 4.7.12 Licensee Submittal: Page 15 [62]; Table 3, Page 12 [1]; FRC SCEW 70

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Soction 3 of this TER for Legend)

R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

Not stated, (Not applicable deferred)

LISTING OF APPLICABLE CHECKSHEETS:

| Contents | | ckshe | eet I | Page | No. | |
|---|------|------------|------------|-------------|------|-------------|
| Equipment Item | la | | | | | |
| Summary of Licensee Responses to the NRC SER | lb | | | | | |
| Equipment Environmental Qualification Summary Forms | 2 | | | | | |
| Licensee Response to NRC SER | 3a, | 36, | ⅔, | 36 | | |
| System Consideration Review | 46., | 36, | 48., | 46 , | 46., | 4 \$ |
| Equipment Environmental Qualification Review | 5a, | 5b, 9%, | 5c, 5X, | 5d, ≯\$ | 36, | 5f, |
| Installed TMI Lessons Learned Implementation Equipment Summary | ĜÆ, | 66 | | | | |
| Maintenance and Replacement Schedule Summary | 7 | No. | de | | | |

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20th and Race Streets. Phila .. Pa. 19103 (215) 448-1000

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| 401 | PMENT ENVIRONMENTAL GOALIFICATION REVIEW OF EGOIPMENT TEM NO. 21 |
|-------------------|--|
| - | |
| UMN | MARY OF LICENSEE RESPONSES TO THE NRC SER - ONLY CHECKED ITEMS ARE APPLICABLE |
| | The Licensee (has/has not) provided a response to the SER concerns. |
| _ | The Licensee (has/has not) specifically stated that the equipment is qualified and/or will function when exposed to the applicable DBE environmental service conditions. |
| × | The Licensee has presented information which shows there are no outstanding qualification deficiencies. |
| - | The Licensee (has/has not) proposed a corrective action for this equipment item whose qualification has not been fully established. |
| | Justification for interim operation (has/has not) been provided by the Licensee for this equipment item. |
| | Corrective action specified by the Licensee: |
| | <pre>Equipment replacement with qualified equipment Equipment modification Equipment relocation above submergence level Relocate or shield equipment from radiation source Verify qualification by additional (testing/analysis) Equipment relocation to a mild environment Qualification testing of equipment in progress)</pre> |
| | The Licensee has provided other information for this equipment item that can be construed as a basis for justification for interim operation. |
| | The Licensee (has/has not) provided a schedule for the proposed corrective action. (Schedule for accomplishing the corrective action) |
| | The Licensee states that the equipment item does not require qualification and/or should be exempted from environmental qualification. |
| DES - C | IGNATION OF RESULTANT NRC QUALIFICATION EVALUATION CATEGORY BASED ON REVIEW IRCLED ITEM ONLY: (See Section 3 of this TER for Legend) |
| I.a I.b II. | Qualified II.c Qualified Life Deficiency Modification III.a Exempt Qualification Not Established III.b Not in Scope b Not Qualified IV Documentation Not Available |
| | in the Addition Mot Available |

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 29

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

DESIGNATION: X = DEFICIENCYNRC REQUIREMENTS Documented Evidence of Qualification Adequate X Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately × Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

NRC QUALIFICATION CATEGORY

DESIGNATION: X = CATEGORY

| I.a | Equipment Qualified | |
|-------|--|-----|
| I.b | Equipment Qualification Pending Modification | |
| II.a | Equipment Qualification Not Established | _X_ |
| II.b | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life | |
| | or Replacement Schedule Justified | |
| III.a | Equipment Exempt From Qualification | |
| III.b | Equipment Not in the Scope of the Qualification Review | |
| IV | Documentation Not Made Available | |

| Franklin Research Center | NRC Contract No. NRC-03-79-118 FRC Project No. C5257 | Pape |
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| A Division of The Franklin Institute 20th and Race Streets. Phila Pa. 19103 (215) 448-1000 | FRC / ssignment No. 13 FRC Task No. 454 | 3a |

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 29

LICENSEE RESPONSE TO NRC SER

Item 4.7.12 addresses cooling fan motors located in the auxiliary building. These motors are subject to a radiation environment during post-LOCA sump recirculation, and should thus be reviewed for qualification in the "harsh" environment. As stated in b) above, Reference 2.69 is applicable to these motors.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 29

Checksheets 5a thru 5f have been removed due to the

proprietary nature of information contained therein.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 29

MAINTENANCE AND REPLACEMENT SCHEDULE SUMMARY

The following information regarding the maintenance and replacement schedule(s) for components, sub-components, and materials has been provided by the Licensee.

as stated in maintenance procedure A-1011.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 30

Equipment Item No. 30 Motors Located in Auxiliary Building (Area #2) Westinghouse Model SBDP, 3 hp, Class B Insulation Drive Cooling Fans for CS Charging and SI Pump Motors (Plant ID Not Stated) Licensee Reference 605 Required Operating Time: Long term TER Checksheet No. 30 Reference 59, Section 4.7.12 Licensee Submittal: Page 15 [62]; Table 3, Page 12 [1]; FRC SCEW 69

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

Not stated, (Not applicable deferred)

LISTING OF APPLICABLE CHECKSHEETS:

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Installed TMI Lessons Learned Implementation Equipment Summary

Maintenance and Replacement Schedule Summary

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 30

| SUMMARY OF LICENSEE RESPONSES TO THE NRC SER - ONLY CHECKED ITEMS ARE APPLICABLE: |
|---|
| |
| The Licensee (has/has not) provided a response to the SER concerns. |
| The Licensee (has/has not) specifically stated that the equipment is qualified and/or will function when exposed to the applicable DBE |
| environmental service conditions. |
| X The Licensee has presented information which shows there are no outstanding qualification deficiencies. |
| The Licensee (has/has not) proposed a corrective action for this equipment item whose qualification has not been fully established. |
| Justification for interim operation (has/has not) been provided by the Licensee for this equipment item. |
| Corrective action specified by the Licensee: |
| Equipment replacement with qualified equipment |
| Equipment relocation above submergence level |
| Relocate or shield equipment from radiation source |
| Verify qualification by additional (testing/analysis) |
| Equipment relocation to a mild environment |
| Qualification testing of equipment in progress Other () |
| The Licensee has provided other information for this equipment item that can be construed as a basis for justification for interim operation. |
| The Licensee (has/nas not) provided a schedule for the proposed corrective action. (Schedule for accomplishing the corrective action |
| |
| The Licensee states that the equipment item does not require qualification and/or should be exempted from environmental qualification. |
| DESIGNATION OF RESULTANT NRC QUALIFICATION EVALUATION CATEGORY BASED ON REVIEW |
| - CIRCLED ITEM ONLY: (See Section 3 of this TER for Legend) |
| I.a Qualified II.c Qualified Life Deficiency |
| I.b Modification III.a Exempt |
| (II.a) Qualification Not Established III.b Not in Scope |
| II.b Not Qualified IV Documentation Not Available |
| |

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 30

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

NRC REQUIREMENTS

DESIGNATION: X = DEFICIENCY

| Documented Evidence of Qualification Adequate X Adequate Similarity Between Equipment and Test Specimen Established X Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) X Program Established to Identify Aging Degradation |
|---|
| Criteria Regarding Aging Simulation Satisfied (If Required) |
| Criteria Regarding Temperature/Pressure Exposure: |
| o Peak Temperature Adequate |
| o Peak Pressure Adequate |
| o Duration Adequate |
| o Required Profile Enveloped Adequately |
| o Steam Exposure (If Required) Adequate |
| Criteria Regarding Spray Satisfied |
| Criteria Regarding Submergence Satisfied |
| Criteria Regarding Radiation Satisfied |
| Criteria Regarding Test Sequence Satisfied |
| Criteria Regarding Test Failures or Severe Anomalies |
| (If Any) Satisfied |
| Criteria Regarding Functional Testing Satisfied |
| Criteria Regarding Instrument Accuracy Satisfied |
| Test Duration Margin (1 hour + Function Time) Satisfied |
| Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I) |
| |

NRC QUALIFICATION CATEGORY

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DESIGNATION: X = CATEGORY

| I.a | Equipment Qualified | - |
|-------|---|----|
| I.b | Equipment Qualification Pending Modification | |
| II.a | Equipment Qualification Not Established | _X |
| II.b | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life or Replacement Schedule Justified | |
| III.a | Equipment Exempt From Qualification | |
| III.D | Equipment Not in the Scope of the Qualification Review | |
| IV | Documentation Not Made Available | |

NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 30

LICENSEE RESPONSE TO NRC SER

Item 4.7.12 addresses cooling fan motors located in the auxiliary building. These motors are subject to a radiation environment during post-LOCA sump recirculation, and should thus be reviewed for qualification in the "harsh" environment. As stated in b) above, Reference 2.69 is applicable to these motors.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 30

Checksheets 5a Chru 5f have been removed due to the

proprietary nature of information contained therein.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 30

MAINTENANCE AND REPLACEMENT SCHEDULE SUMMARY

The following information regarding the maintenance and replacement schedule(s) for components, sub-components, and materials has been provided by the Licensee.

Bearings and grease will be replaced yearly per maintenance procedure A-1011.



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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 31

Equipment Item No. 31 Electrical Penetrations Located Within and Outside Containment (Area #1) Crouse-Hinds Co. (Various Conductor Configurations; Models Not Stated) Provides Connection for Electrical Circuits Licensee References 33, 37, 40, 537, and 749 Required Operating Time: Long term TER Checksheet No. 31 Reference 59, Section 4.2.1.1 Licensee Submittal: Page 5 [62]; Table 3, Page 5 [1]; FRC SCEW 34

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NFC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

Not stated, Not applicable

LISTING OF APPLICABLE CHECKSHEETS:

Maintenance and Replacement Schedule Summary

| Contents | Checksheet Page No. |
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| Summary of Licensee Responses to the NRC SER | lb |
| Equipment Environmental Qualification Summary Forms | s 2 |
| Licensee Response to NRC SER | 3a, 36, 36, 30 |
| System Consideration Review | 物、纸、纸、纸、铁、 |
| Equipment Environmental Qualification Review | 36, 36, 36, 36, %, 关, 39, 36, X, X, S |
| Installed TMI Lessons Learned Implementation Equipment Summary | ĝa, 96 |
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| Fra | nklin | Research | Cent | er | | | |
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| 20tl | and F | Race Streets | Phila | Pa | 19103 | (215) | 448 |

| 20th and Race Streets. Phila. Pa 19103 (215) 448-1000 | FRC Task No | |
|---|--|---------------|
| QUIPMENT ENVIRONMENTAL QUALIFIC | ATION REVIEW OF EQUIPMENT ITEM | NO. <u>31</u> |
| | | |
| SUMMARY OF LICENSEE RESPONSES TO THE | NRC SER - ONLY CHECKED ITEMS ARE APP | LICABLE |
| The Licensee (has/has not) provide | ed a response to the SER concerns. | |
| X The Licensee (has/has not) specific qualified and for will function whe environmental service conditions. | ically stated that the equipment is en exposed to the applicable DBE | |
| X The Licensee has presented inform outstanding qualification deficie | ation which shows there are no ncies. | |
| The Licensee (has/has not) propose item whose qualification has not h | ed a corrective action for this equi been fully established. | pment |
| Justification for interim oper Licensee for this equipment i | ration (has/has not) been provided b tem. | by the |
| Corrective action specified by | y the Licensee: | |
| Equipment replacement with Equipment modification Equipment relocation above Relocate or shield equipment Verify qualification by a Equipment relocation to a Qualification testing of Other (| h qualified equipment e submergence level ent from radiation source dditional (testing/analysis) mild environment equipment in progress |) |
| The Licensee has provided other that can be construed as a ba operation. | er information for this equipment it sis for justification for interim | em |
| The Licensee (has/has not) pro- corrective action. (Schedule action | ovided a schedule for the proposed for accomplishing the corrective |) |
| The Licensee states that the equi and/or should be exempted from en | pment item does not require qualific vironmental qualification. | ation |
| DESIGNATION OF RESULTANT NRC QUALIFIC - CIRCLED ITEM ONLY: (See Section 3 | ATION EVALUATION CATEGORY BASED ON F of this TER for Legend) | EVIEW |
| Qualified I.b Modification | II.c Qualified Life Deficiency III.a Exempt | |

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 3/

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

NRC REQUIREMENTS

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DESIGNATION: X = DEFICIENCY

| Documented Evidence of Qualification Adequate |
|---|
| Adoguate Similarity Between Equipment and Test Specimen Established |
| Adequate Similarity between Equipment and root operation and and a |
| Aging Degradation Evaluated Adequately Detablished (If Poguired) |
| Qualified Life or Replacement Schedule Established (If Required) |
| Program Established to Identify Aging Degradation |
| Criteria Regarding Aging Simulation Satisfied (If Required) |
| Criteria Regarding Temperature/Pressure Exposure: |
| o Peak Temperature Adequate |
| o Peak Pressure Adequate |
| o Duration Adequate |
| o Required Profile Enveloped Adequately |
| o Steam Exposure (If Required) Adequate |
| Criteria Regarding Spray Satisfied |
| Criteria Regarding Submergence Satisfied |
| Criteria Regarding Radiation Satisfied |
| Criteria Regarding Test Sequence Satisfied |
| Criteria Regarding Test Failures or Severe Anomalies |
| (If Any) Satisfied |
| Criteria Regarding Functional Testing Satisfied |
| Criteria Regarding Instrument Accuracy Satisfied |
| Test Duration Margin (1 hour + Function Time) Satisfied |
| Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I) |

NAT: QUALIFICATION CATEGORY

DESIGNATION: X = CATEGORY

| I.a | Equipment Qualified | _X |
|-------|--|----|
| I.b | Equipment Qualification Pending Modification | |
| II.a | Equipment Qualification Not Established | |
| II.b | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life | |
| | or Replacement Schedule Justified | |
| III.a | Equipment Exempt From Qualification | |
| III.b | Equipment Not in the Scope of the Qualification Review | |
| IV | Documentation Not Made Available | |
| | | |

This equipment item was previously evaluated in Reference 59. See page 1A Equipment Item description.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO.31

LICENSEE RESPONSE TO NRC SER

In Section 4.2.1, the Crouse-Hinds electrical penetrations were classified as NRC Category I.a. No additional information is thus required. Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 32

Equipment Item No. 32 Electrical Penetration Located Both Within and Outside Containment (Area #1) Westinghouse, Model Not Stated Provides Connection for Electrical Circuits Licensee References 38, 2098, 2099, 2100, 2101, 2102, 2103, 2104, and 2105 Required Operating Time: Long term TER Checksheet No. 32 Reference 59, Section 4.6.3 Licensee Submittal: Page 11 [62]; Table 3, Page 5 [1]; FRC SCEW 35

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

(R,) T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

Not stated, Not applicable

LISTING OF APPLICABLE CHECKSHEETS:

Checksheet Page No. Contents la Equipment Item Summary of Licensee Responses to the NRC SER 1b Equipment Environmental Qualification Summary Forms 2 3a, 3k, 3k, 3k, 3k Licensee Response to NRC SER 346, 406, 40c, 40d, 40e, 40e System Consideration Review 5a, 5b, 5c, 5d, 5e, 5f, Equipment Environmental Qualification Review 5g, 5x, 5x, 3x Installed TMI Lessons Learned Implementation 68, 66 Equipment Summary

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Maintenance and Replacement Schedule Summary

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|--|--|---------------|
| EQUIPMENT ENVIRONMENTAL QUALIFIC | ATION REVIEW OF EQUIPMENT ITEM | NO. <u>32</u> |
| SUMMARY OF LICENSEE RESPONSES TO THE N | NRC SER - ONLY CHECKED ITEMS ARE APP | LICABLE: |
| X The Licensee (has/has out) provide | ed a response to the SER concerns. | |
| X The Licensee (has/has not) specifi qualified and/er will function whe environmental service conditions. | ically stated that the equipment is en exposed to the applicable DBE | |
| X The Licensee has presented informa outstanding qualification deficier | ation which shows there are no ncies. | |
| The Licensee (has/has not) propose item whose qualification has not b | ed a corrective action for this equi been fully established. | pment |
| Justification for interim oper Licensee for this equipment it | ration (has/has not) been provided b tem. | y the |
| Corrective action specified by | the Licensee: | |
| Equipment replacement with Equipment modification Equipment relocation above Relocate or shield equipme Verify qualification by ad Equipment relocation to a Qualification testing of e Other (| n qualified equipment e submergence level ent from radiation source dditional (testing/analysis) mild environment equipment in progress | _) |
| The Licensee has provided othe that can be construed as a bas operation. | er information for this equipment it sis for justification for interim | em |
| The Licensee (has/has not) pro corrective action. (Schedule action | ovided a schedule for the proposed for accomplishing the corrective . |) |
| The Licensee states that the equip and/or should be exempted from env | oment item does not require qualific vironmental qualification. | ation |
| DESIGNATION OF RESULTANT NRC QUALIFICA - CIRCLED ITEM ONLY: (See Section 3 of | ATION EVALUATION CATEGORY BASED ON R of this TER for Legend) | EVIEW |
| (I.a) Qualified I.b Modification II.a Qualification Not Established II.b Not Qualified | II.c Qualified Life Deficiency III.a Exempt III.b Not in Scope IV Documentation Not Available | |
| | | |

2 Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. _____454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 32

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

NRC REQUIREMENTS

DESIGNATION: X = DEFICIENCY

| Documented Evidence of Qualification Adequate | |
|---|--|
| Adequate Similarity Between Equipment and Test Specimen Established | |
| Aging Degradation Evaluated Adequately | |
| Qualified Life or Replacement Schedule Established (If Required) | |
| Program Established to Identify Aging Degradation | |
| Criteria Regarding Aging Simulation Satisfied (If Reguired) | |
| Criteria Regarding Temperature/Pressure Exposure: | |
| o Peak Temperature Adequate | |
| o Peak Pressure Adequate | |
| o Duration Adequate | |
| Bequired Profile Enveloped Adequately | |
| o Steam Exposure (If Required) Adequate | |
| Criteria Pedarding Spray Satisfied | |
| Criteria Regarding Submergence Satisfied | |
| Criteria Regarding Padiation Satisfied | |
| Criteria Regarding Machacion Satisfied | |
| Criteria Regarding Test Sequence Satisfied | |
| Criteria Regarding fest rallules of Severe Anomalies | |
| (If Any) Satisfied | |
| Criteria Regarding Functional Testing Satisfied | |
| Criteria Regarding Instrument Accuracy Satisfied | |
| Test Duration Margin (1 hour + Function Time) Satisfied | |
| Criteria Regarding Margins Satisfied (NUREG-0588, Cat. 1) | |

NRC QUALIFICATION CATEGORY

DESIGNATION: X = CATEGORY

.

| T a | Equipment Qualified | × |
|-------|--|---|
| * | Provide Augustification Pending Modification | |
| 1.0 | Equipment Qualification Fending Modification | |
| II.a | Equipment Qualification Not Established | |
| II.D | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life | 1 |
| | or Replacement Schedule Justified | |
| III.a | Equipment Exempt From Qualification | |
| III.D | Equipment Not in the Scope of the Qualification Review | |
| IV | Documentation Not Made Available | |
| | | |

A Division of The Franklin Institute 20th and Race Streets. Phila... Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 32

LICENSEE RESPONSE TO NRC SER

Item 4.6.3 addresses the Westinghouse electrical penetration. New reference 2.61, included with this report, provides detailed comprehensive qualification data for post-accident qualification testing of the penetrations, as well as a detailed aging evaluation. Please note that even though PEN-TR-81-45 specifies only a 268°F peak temperature, with a radiation dose of 1.5 x 10° rads, the actual testing was performed at 340°F, with an integrated dose of 2 x 10° rads.

The question of short-circuit currents damaging these penetrations was discussed during a telephone conversation between RG&E personnel and Messrs. DiBenedetto and Lee of the NRC staff. At that time, we stated that only LVDT and

television camera cables use this penetration. These are low voltage and current circuits, which could not damage the penetration even in the event of a short-circuit fault. An assessment of similarly-used penetrations (used as parts of instrumentation loops), is made in Section 3.4 of the "SEP Technical Evaluation, Topic VIII-4, Electrical Penetrations of Reactor Containment," transmitted by letter from Dennis M. Crutchfield to John E. Maier dated March 30, 1981. It was concluded that no mechanical failures would be expected for these penetrations. A Division of The Franklin Institute

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| | | | 2 |
|--|-----------------------------------|-----------------------------------|--------------------------------|
| EQUIPMENT EN | VIRONMENTAL QU | ALIFICATION REVIEW | |
| Criteria: DOR Guidelines 🗶 | ; NUREG-0588, | Cac. I; NUREG-0588, Cat | . 11 |
| NRC REQUIREMENTS WITH SECTION REFERENCE (DOR/0588-1/0588-11) | LICENSEE SUBMITTAL | QUALIFICATION DOCUMENTATION | DEFICIENC (X OR NOTE NO. |
| EQUIPMENT DESCRIPTION Equipment Type | Electreicel | Electric +L | |
| Manufacturer's Name (5.2.2/-/-) | westinghouse | Westinghouse | |
| Model Number (5.2.2/-/-) | Not Stated | WX32714 ForGinnA Plant | |
| Serial Number | Not stated | NOZZLE NO AE-12 | : |
| Features/Mounting | i | Horizontal; Bitted Flange | i |
| (5.2.6/-/-) | | | 1 |
| Connections/Interfaces (5.2.6/-/-) | COAXBINST Oable with Splice | COAX and inst Cato with Splice | |
| Location/Elevation | Not Stated | Not stated. | i |
| Equipment ID No. | NA. | NA | |
| QUALIFICATION REPORT (8.0/5.0/5.0) | | | |
| Report ID Number | PEN-TR-81-45 | PEN-TR-81-15 | : See m |
| Report Date | August 7,1981 | August 7, 981 | |
| Issued by | westinghouse | Westinghouse | : |
| Prepared for | : Ginna : | Ginnephent | |
| Referenced Reports | see Note 1 | see more 1 | see no |
| Qualification Method (5.1, 5.3/2.1, 2.4/2.1, 2.4) | Test and analysis | Test and analysis. | |
| QUALIFICATION TEST PROGRAM Functional Test Description (5.2.5/2.2.9/2.2.9) | Notstated | Insulation Resistance Leaktest | |
| Operating Conditions (-/2.2.10/2.2.10) Load/Cycles/Voltage/ | Various Low Voltege | 480 V/60Hg. | see mate |

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| NRC REQUIREMENTS WITH SECTION REFERENCE (DOR/0588-1/0588-11) | LICENSEE | QUALIFICATION | DEFICIENCY (X OR NOTE NO.) |
|--|----------------|-----------------------|----------------------------------|
| <u>,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,</u> | 1 | Paahay / 15-2+dec/h | : |
| Acceptance Criteria | :Not : | in a marching | 1 |
| (5.2.5/2.2.1/2.2.1) | Stated | IR > Too Fregoria | |
| Accuracy (5.2.5/-/-) | Not Applicable | Not Applicable | - |
| Number of Specimens | nat stated | one. (1) | 1 |
| Test Instruments Calibrated | notapplicable | yes | 1 |
| Safety Function (Active/ Passive) (-/2.1.3/2.1.3) | Passine | not applicable | 1 |
| Test Duration $(5.2.1/-/-)$ | matstated | 26h. +45 hours | |
| Accident Duration (Envir. Above Normal) (5.2.1/-/-) | ~ I day | 26h. | 1 |
| Required Function Time | LONGTERM | Not Applicable | 1 |
| Test Sequence (General) (5.2.3/2.3.1/2.3.1) | Not stated | | |
| Test Sequence (NUREG-0588, Cat. I) (-/2.3.1/-) | Notpplicable | DFunctional | NUREG |
| 1. Representative Sample | | @ steam 45 hours | SS88 BMY |
| 2. Baseline Data | | | |
| 3. Performance Extremes | | S Functiona The | ginne |
| 5. Radiation Aging | | 9 Thermal Cycling | : Coveded |
| 6. Wear Aging | 1 1 | E thermal rains | :134 |
| 7. Vibration/Seismic | 1 1 | 6 functional feat | : Don |
| 8. DBE Exposure | : | 3 Tapalu Fin | : Guide The |
| 9. Post-DBE Exposure | : | O LERGELFION | |
| 1 ^o . Inspection | , v | (8) LOCA Test | |
| Aging | 1 | | |
| (5.2.4, 7.0/4.0/4.0) | 1 | APPHPALLYS +TEST | : |
| Thermal Aging/Basis | ARRHENIUS | OF Penetration and | 1 |
| Material Aging | 1 | IN DIVIDUAI MOTERIAIS | 1 |
| Evaluation $(7.0/-/-)$ | Not stated | E pox-1-W Q-1 | 1 |
| | 1 | EPANA GALANS | : |
| Materials Susceptible | Refer to | Chass Leminare | ! |
| (Thermal) (5.2.4, 7.0/-/-) | Test Report | OKONITE/OKOFRENE | |
| Radiation Aging, Type | 1 | cdbie insulation | 1 |

2 Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila . Pa. 19103 (215) 448-1000

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 32

| NRC REQUIREMENTS WITH SECTION REFERENCE | LICENSEE | QUALIFICATION | DEFICIENCY (X OR NOTE NO.) |
|--|--------------------------------|--------------------------------------|--------------------------------------|
| (DOR/ 0308-1/ 0308-11) | ! ! | DOCOMENTIAL | ! |
| Radiation Aging, Dose (rd) | < 10" rd | Not stated | 1 |
| Radiation Aging, Dose Rate | : < ind/h. : | Not States | ÷ |
| Radiation Aging, Method | Not | Included in Accident dose | 1 |
| Materials Susceptible (Radiation) (5.2.4, 7.0/-/-) | Not Stated | None Identified | : |
| Operational Aging (-/4.2/-) | Not Applicable | - 20°C to 135°C First ive eyelos. | |
| Other Age Conditioning (-/4.2/-) | Not Applicable | 84 days @ 125°C @ 480 V | Ryand 2098 sheet St |
| Qualified life Claimed/ Established (5.2.4/4.10/-) | Plan+(404) Life (404) | > 50 years @ 70°C | Reportos 2100 sheet SF |
| Normal Ambient Temperature Normal Ambient Radiation Normal Ambient Humidity | 60-1200F 21rd/h 50% Nom. | 70-1200E | |
| On-Going Surveillance and Preventive Maintenance (7.0/-/-) | SINNA PROGRAM | NotAppliceble | |
| On-Going Analysis of Failures and Degradation (7.0/-/-) | to R. Maintenance PSR-30 | Notapplicable | |
| Margin (General) (6.0/3.0/3.0) | N ot Applicable | Not stated. | Enveloped Containment Profile. |
| <pre>Margin (NUREG-0588, Cat. I) (-/3.2/-) 1. Temperature (+15°F) 2. Pressure (+10%,</pre> | Not Applicable | Notapplicable | No Regosts Regit Only |
| Radiation (not required) Time (+10%, +1 hour + function time minimum) | | | : : : |

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| NRC REQUIREMENTS WITH SECTION REFERENCE (DOR/0588-I/0588-II) | LICENSEE SUBMITTAL | QUALIFICATION DOCUMENTATION | DEFICIENCY (X OR NOTE NO.) |
|---|-----------------------|----------------------------------|----------------------------------|
| ACCIDENT CONDITIONS | | | |
| LOCA/MSLB/HELB/Uncontrolled (4.1, 4.2, 4.3.1, 4.3.3/ 1.1, 1.2, 1.5/1.1, 1.2, 1.5) | see Note 2 | Not Appliechle | perneti pg-59 |
| Radiation Type | Gemma | Gemma | 1 |
| Radiation Dose (rd) (4.1.2/1.4/1.4) | Not-Stated | 2.1 × 108 rd | |
| Radiation Dose Rate (rd/hr) Radiation Qual. Method (5.3.1/-/-) | 2.1 × 104 | Not stated. Test (sequential) | |
| Proximity to Concentrated Radiation (4.1.2/1.4.6/1.4.6) | Notapplicble | Not Appliceble | |
| Equipment Susceptible to Beta Radiation (4.1.2/-/-) | Notstated | Not Stated | |
| Radiation Dose (Normal + Accident) (4.1.2/-/-) | 1.5×108rd | 21×108 rd. | |
| Plateout Dose Considered (-/1.48/1.48) | Not stated | Not Stated | |
| Gamma + Beta Dose (rd) (4.1.2/1.4.7/1.4.7) | Notstated | Not Stated | |

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| NRC REQUIREMENTS WITH SECTION REFERENCE | LICENSEE | QUALIFICATION | DEFICIENCY (X OR |
|--|--|--|-----------------------------|
| (DOR/0588-1/0588-11) | SUBMITTAL | DOCUMENTATION | NOTE No.) |
| ENVIRONMENTAL PROFILE OF ACCIDENT CONDITIONS | | | |
| Rate of Temp./Press. Increase | 28.6°F/S 6ps#s/S | Not Stated | |
| Peak: °F/psig/RH/Time | 286/60/100/27/ | 340°F/60/100/6h. | |
| Decrease To: °F/psig/RH/Time | 250/20/100/274 | 3205-145/100/6h. | |
| Decrease To: °F/psig/RH/Time | 125/20/10/18.ch | 226°F/10/100/16h | |
| Decrease To: °F/psig/RH/Time | | 240"F/10/100/8n. | |
| Equipment Surface Tempera- ture (MSLB) (-/1.2.5.C, 2.2.6/1.2.5.C, 2.2.6) | Not Applicable | Not Applicable | NUREGOSTS DAILY Rogt- |
| Spray Qualification Method (5.3.2/1.3, 2.2.8/1.3, 2.2.8) | TesT | Test (simultaneous) | |
| Spray Composition (4.1.4/1.3, 2.2.8/ 1.3, 2.2.8) | Burie Acid (2000-3000 ppm Boron) + N20H 0H 8-10 | 2000 ppm Boric Acid Soffered with NooH for PH 9-10 | |
| Spray Density (gpm/ft ²) | Not Stated | Not stated | |
| Spray Duration | Notstated | 3 hours | |
| Submergence Duration | ! Not | NOTA- lichte | |
| (4.1.3/2.2.5/2.2.5) | Applicable | nonappire | 1 |
| In-Leakage Considered (5.2.6, 5.3.2/-/-) | Leaktest. 1×10- stocchs. | 1×10 b stdcc/sec | - |
| Time to Submergence | Not | Not Applicable | |
| Dust Environment | | 0 1 | |
| (-/2.2.11/2.2.11) | : NoT Applicable | Not Applicable | 1 |
| | 00 | | |

Franklin Research Center A Division of The Franklin Institute 20th and Race Streets, Phila, Pa 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 4.54

NOTES: Repart PEN-TR-81-45 dated a 7,1981 incorporated and Re following additional Reports. 2099. J. F. Quirk Predicting the Thermal Life of Modular Penetrations Westinghouse, 27-May-75 75-785-BIGAL-R2 2100. R. L. Korner Dielectric Strength and Insulation Resistance Test Results of Westinghouse Modules which were Subjected to Accelerated Heat Aging at 150 degrees C. Westinghouse, 12-May-75 PEN-TR-75-10 2101. R. L. Korner Explanation of Accelerated Aging Westinghouse, 07-Aug-81 PEN-TR-81-46 2102. V. Liotino Electrical Performance of an Electrical Penetration Module under Accelerated Heat Aging Conditions Westinghouse, 18-Sep-79 PEN-TR-79-73 2103. F. M. McAvoy Aging, Exposure to 200 Megarads of Gamma Radiation and Accident Condition Qualification Testing of Power Cables, Control Cables and Splice Okonite Co., 29-Feb-72 E.R. 141 2104. E. E. McIlveen, V. L. Garrison, and G. T. Dobrowolski Class 1E Cables for Nuclear Power Generating Stations IEEE, 16-Nov-73 T 74 044-4 2105. E. E. McIlveen, V. L. Garrison, and G. T. Dobrowolski Cables for Nuclear Power Generating Stations Okonite Co., 24-Feb-75 E.N. 74-1, Rev.

A Division of The Franklin Institute 20th and Race Streets. Phila... Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. ____454___

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NOTES: The data from these reports has been included inp the check, sheets rensel stated that Note th, 201 H ELB calculate. 151 ß 21 Shert circuit current Noke 3evaluation is contained in PSR 72

Franklin Research Center A Division of The Franklin Institute 20th and Race Streets, Phila., Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 33

Equipment Item No. 33 Terminal Blocks Located Inside Containment (Area #1) Westinghouse Model 542247 Provides Connection for Electrical Circuits Licensee References 31, 39, and 718 Required Operating Time: Long term TER Checksheet No. 33 Reference 59, Section 4.6.4 Licensee Submittal: Page 12 [62]; Table 3, Page 6 [1]; FRC SCEW 36

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

(R) T, QT', RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

Not stated, Not applicable

LISTING OF AFPLICABLE CHECKSHEETS:

| Contents | Chec | kshe | et I | Page | No. | |
|---|------------|------|------|------|-----|-----|
| Equipment Item | la | | | | | |
| Summary of Licensee Responses to the NRC SER | 1b | | | | | |
| Equipment Environmental Qualification Summary Forms | 2 | | | | | |
| Licensee Response to NRC SER | 3a, | 36, | 36, | 38 | | |
| System Consideration Review | 4a, | 频, | 44, | 始, | ¥ę, | ₩ |
| Equipment Environmental Qualification Review | 5%, 5%, | ¥, | ¥,× | ×× | ¥ę, | ¢€, |
| Installed TMI Lessons Learned Implementation Equipment Summary | 6¢. | 96 | | | | |
| Maintenance and Replacement Schedule Summary | 74, | 26, | × | | | |

| A Division of The Franklin Institute 20th and Race Streets. Phila. Pa 19103 (215) 448-1000 | NEC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454 | Page 1b |
|---|--|------------|
| QUIPMENT ENVIRONMENTAL QUALIF | CATION REVIEW OF EQUIPMENT ITE | M NO. 3 |
| SUMMARY OF LICENSEE RESPONSES TO TH | E NRC SER - ONLY CHECKED ITEMS ARE A | APPLICABL |
| | | |
| X The Licensee (has/has not) prov | ided a response to the SER concerns. | |
| X The Licensee (has/has not) spect qualified and/or will function a environmental service condition | ifically stated that the equipment : when exposed to the applicable DBE s. | is |
| The Licensee has presented info outstanding qualification defic | rmation which shows there are no iencies. | |
| X The Licensee (has/h as not) proposition has not | osed a corrective action for this ed t been fully established. | quipment |
| Justification for interim of Licensee for this equipment | peration (has/has not) been provided item. | d by the |
| X Corrective action specified | by the Licensee: | |
| Equipment replacement w | ith qualified equipment | |
| X Equipment relocation ab | ove submergence level | |
| Relocate or shield equip | pment from radiation source | |
| Equipment relocation to | a mild environment | |
| Qualification testing o | f equipment in progress | |
| X Other (replace if g | ualification test not successful |) |
| The Licensee has provided o that can be construed as a operation. | ther information for this equipment basis for justification for interim | item |
| X The Licensee (has/nes set) | provided a schedule for the propose | d |
| corrective action. (Schedu | le for accomplishing the corrective | |
| action relocate by Spr | ing of 1982, Test/replace 6/30/1 | 82.) |
| The Licensee states that the eq and/or should be exempted from | uipment item does not require quali environmental qualification. | fication |

DESIGNATION OF RESULTANT NRC QUALIFICATION EVALUATION CATEGORY BASED ON REVIEW - CIRCLED ITEM ONLY: (See Section 3 of this TER for Legend)

I.a Qualified (.b) Modification II.a Qualification Not Established III.b Not in Scope II.b Not Qualified

II.c Qualified Life Deficiency III.a Exempt IV Documentation Not Available A Division of The Franklin Institute

20th and Race Streets. Phila. Pa. 19103 (215) 448-1000

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|---|----|---|
| | 2 | |

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 33

| | EQUIPMENT ENVIRONMENTAL GONETITION DURING | |
|--|--|------------------------------|
| | | DESIGNATION: |
| NRC REQU | IREMENTS | $\underline{X} = DEFICIENCY$ |
| Document Adequate Aging De Qualifie Program Criteria Criteria O H O H O H O H O H Criteria Criteria Criteria Criteria Criteria Criteria Criteria | ed Evidence of Qualification Adequate Similarity Between Equipment and Test Specimen Estable ogradation Evaluated Adequately ed Life or Replacement Schedule Established (If Require Established to Identify Aging Degradation a Regarding Aging Simulation Satisfied (If Required) a Regarding Temperature/Pressure Exposure: Peak Temperature Adequate Peak Pressure Adequate Duration Adequate Required Profile Enveloped Adequately Steam Exposure (If Required) Adequate a Regarding Spray Satisfied a Regarding Radiation Satisfied a Regarding Test Sequence Satisfied a Regarding Test Failures or Severe Anomalies ny) Satisfied a Regarding Functional Testing Satisfied a Regarding Instrument Accuracy Satisfied | lished ed) |
| Test Du | ration Margin (1 hour + Function Time) Satisfied | |
| Criteri | a Regarding Margins Satisfied (NUREG-0588, Cat. I) | |
| NRC OUR | TETCATION CATEGORY | DESIGNATION X = CATEGOR |
| And you | | |
| I.a | Equipment Qualified | |
| I.b | Equipment Qualification Pending Modification | _X |
| II.a | Equipment Qualification Not Established | |
| II.b | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified | d hite |
| *** | Fruitmont Promot From Qualification | |
| 111.0 | FAULDINGITE EXCHIPTE FLORI VUGITITION ALVA | |

III.b Equipment Not in the Scope of the Qualification Review IV Documentation Not Made Available

Y'

This equipment item was previously evaluated in Reference 59. See page 1A Equipment Item description.

A Division of The Franklin Institute 20th and Race Streets. Phila., Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 3.3

LICENSEE RESPONSE TO NRC SER

Item 4.6.4 addresses terminal blocks. These terminal blocks will be elevated, together with the pressurizer pressure and pressurizer level instrumentation, during the Spring 1982 refueling shutdown. Submergence will thus no longer be of concern.

To reduce the possibility of conductance between the terminals during an HELB, the terminal blocks will be periodically cleaned. At that time the blocks will be inspected for possible aging degradation. The steam test (FIRL #F-C4911-1) indicates that satisfactory performance may be expected for protected terminal blocks. The terminal blocks at Ginna are protected from direct spray impingement by their location in the pressurizer instrumentation cabinets. Also, resilient washers will be installed under the blocks to preclude any cracking of the block while mounting or connecting to the block.

Additional information is still being developed relative to qualification of these terminal blocks. If full documentation cannot be provided, either a type test will be conducted before June 30, 1982, or the terminal blocks will be replaced with fully qualified Raychem sleeves. Franklin Research Center A Division of The Frankle Jastitute 20th and Race Streets. P. 44a . Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. ____454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 34

Equipment Item No. 34 Electric Cables Located Inside Containment (Area (1) Kerite Co. Cable Type HT Power Cables, Provides Electrical Distribution Licensee References 10, 34, 574, and 2052 Required Operating Time: Long term TER Checksheet No. 34 Reference 59, Section 4.5.2.3 Licensee Submittal: Page 7 [62]; Fable 3, Page 6 [1]; FRC &CEW 37

DESIGNATION FOR DEFICIENCY IDEN IFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

Not stated, Not applicable

LISTING OF APPLICABLE CHECKSHEETS:

| Contents | Chec | ckshe | et I | Page | No. | |
|---|-------------|-------------|------|------|-----|-----|
| Equipment Item | la | | | | | |
| Summary of Licensee Responses to the NRC SER | 125 | | | | | |
| Equipment Environmental Qualification Summary Forms | 2 | | | | | |
| Licensee Response to NRC SER | 3a, | 36, | 36. | 36 | | |
| System Consideration Review | 46, | 46 , | *, | 44, | ¥€, | ¥€ |
| Equipment Environmental Qualification Review | 5a, 5g, | 55, 5h, | 5c, | 5d, | 5e, | 5f, |
| Installed TMI Lessons Learned Implementation Equipment Summary | 6 4, | 646 | | | | |
| Maintenance and Replacement Schedule Summary | 74. | 20. | 74 | | | |

| A Division of The Franklin Institute 20th and Race Streets. Phila. Pa 19103 (215) 448-1000 | FRC Project No. C5257 FRC Assignment No. 13 FRC Task No | Page Ib |
|---|---|------------|
| EQUIPMENT ENVIRONMENTAL QUALIFIC | CATION REVIEW OF EQUIPMENT ITEM | NO. 34 |
| SUMMARY OF LICENSEE RESPONSES TO THE | NRC SER - ONLY CHECKED ITEMS ARE A | PPLICABLE |
| X The Licensee (has/has not) provid | ed a response to the SER concerns. | |
| The Liceasee (has/has not) specif qualified and for will function wh environmental service conditions. | ically stated that the equipment i en exposed to the applicable DBE | S |
| The Licensee has presented inform outstanding qualification deficie | ation which shows there are no encies. | |
| The Licensee (has/has not) propos item whose qualification has not | ed a corrective action for this eq been fully established. | uipment |
| Justification for interim ope Licensee for this equipment i | ration (has/has not) been provided tem. | by the |
| Corrective action specified b | by the Licensee: | |
| Equipment replacement wit Equipment modification Equipment relocation abov Relocate or shield equipm Verify qualification by a Equipment relocation to a | th qualified equipment we submergence level ment from radiation source additional (testing/analysis) a mild environment | |
| Qualification testing of Other (| equipment in progress |) |
| The Licensee has provided oth that can be construed as a ba operation. | ner information for this equipment asis for justification for interim | item |
| The Licensee (has/has not) pr corrective action. (Schedule action | rovided a schedule for the proposed e for accomplishing the corrective | .) |
| — The Licensee states that the equi and/or should be exempted from er | ipment item does not require qualif nvironmental qualification. | lication |
| DESIGNATION OF RESULTANT NRC QUALIFIC - CIRCLED ITEM ONLY: (See Section 3 | CATION EVALUATION CATEGORY BASED ON of this TER for Legend) | N REVIEW |
| I.a Qualified I.b Modification (I.a) Qualification Not Established | II.c Qualified Life Deficiency III.a Exempt III.b Not in Scope IV Documentation Not Availab | ble |
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Page 2

| | DESIGNATION: |
|--|----------------|
| RC REQUIREMENTS | X = DEFICIENCY |
| ocumented Evidence of Qualification Adequate | |
| dequate Similarity Between Equipment and Test Specimen Est | ablished X |
| ging Degradation Evaluated Adequately | |
| ualified Life or Replacement Schedule Established (If Requ | ired) |
| Program Established to Identify Aging Degradation | |
| riteria Regarding Aging Simulation Satisfied (If Required) | |
| riteria Regarding Temperature/Pressure Exposure: | |
| o Peak Temperature Adequate | |
| o Peak Pressure Adequate | |
| o Duration Adequate | |
| Required Profile Enveloped Adequately | |
| o Steam Exposure (If Required) Adequate | |
| Criteria Regarding Spray Satisfied | |
| Criteria Regarding Submergence Satisfied | |
| Criteria Regarding Radiation Satisfied | |
| Criteria Regarding Test Sequence Satisfied | |
| (If Any) Satisfied | |
| Criteria Regarding Functional Testing Satisfied | |
| Criteria Regarding Instrument Accuracy Satisfied | |
| Test Duration Margin (1 hour + Function Time) Satisfied | |
| Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I) | |

| Equipment Qualification Pending Modification | |
|---|--|
| Equipment Qualification Not Established | X |
| Equipment Not Qualified | |
| Equipment Satisfies All Requirements Except Qualified Life or Replacement Schedule Justified | |
| Equipment Exempt From Qualification | |
| Equipment Not in the Scope of the Qualification Review | |
| Documentation Not Made Available | |
| | Equipment Qualification Pending Modification Equipment Qualification Not Established Equipment Not Qualified Equipment Satisfies All Requirements Except Qualified Life or Replacement Schedule Justified Equipment Exempt From Qualification Equipment Not in the Scope of the Qualification Review Documentation Not Made Available |

This equipment item was previously evaluated in Reference 59. See page 1A Equipment Item description.

The licensee should provide the analyses which address and resolve the problems described innotes and 2 pages 57, 59,54.

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3a

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 34

LICENSEE RESPONSE TO NRC SER

Item 4.5.2.3 addresses Kerite cable located inside containment. The FRC evaluation of this cable is in error. Contrary to the statement that this cable was "laid in the bottom of the box," these cables were actually the "main specimens" being tested together with the Raychem sleeves. The Kerite cable should be evaluated, accounting for this correction. RG&E considers that this cable is fully qualified to meet the DOR Guidelines, and should be classified as I.a.

As stated earlier, RG&E believes that the dose rate concern expressed in Appendix H goes beyond the scope of the DOR Guidelines, and is inappropriate for review in this document.

RG&E also notes that the cable testing performed in FIRL Report F-C4020-1 was at peak conditions greatly in excess of the Ginna post-accident environmental conditions. Testing performed at 340°F/113 psig should not be used to make judgments for cables installed at Ginna, whose peak environmental conditons are 286°F/60 psig. RG&E cannot make any definitive arguments relative to F-C4020-1, since it was not provided to us. A Division of The Franklin Institute 20th and Race Streets. Phila... Pa 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 34

Checksheets 5a Thru 5h have been removed due to the

proprietary nature of information contained therein.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 35

Equipment Item No. 35 Electric Cables Located Inside Containment Kerite Co. Cable Type HT Control Cable, Provides Electrical Distribution Licensee References 10, 34, 574, and 2052 Required Operating Time: Long term TER Checksheet No. 35 Reference 59, Section 4.5.2.3 Licensee Submittal: Page 7 [62]; Table 3, Page 6 [1]; FRC SCEW 37

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

(R,) T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

Not stated, Not applicable

LISTING OF APPLICABLE CHECKSHEETS:

| Contents | Chee | ckshe | et I | Page | No. | |
|---|------------|-------|------|------|-----|----|
| Equipment Item | la | | | | | |
| Summary of Licensee Responses to the NRC SER | lb | | | | | |
| Equipment Environmental Qualification Summary Forms | 2 | | | | | |
| Licensee Response to NRC SER | 31, | ж, | ×, | × | | |
| System Consideration Review | 46, | ۶¢, | ×, | ¥4., | ×. | æ |
| Equipment Environmental Qualification Review | 5a, 59, | ×× | ×, | * | * | ×, |
| Installed TMI Lessons Learned Implementation Equipment Summary | 54, | 96 | | | | |
| Maintenance and Replacement Schedule Summary | 26, | 75, | × | | | |

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|---|---|
| I | Franklin Research Center |
| I | A Division of The Franklin Institute |
| L | 20th and Race Streets. Phila. Pa. 19103 (215) 448-100 |

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|--|--|--------------|
| QUIPMENT ENVIRONMENTAL QUALIFIC | ATION REVIEW OF EQUIPMENT ITEM | NO. <u>3</u> |
| SUMMARY OF LICENSEE RESPONSES TO THE | NRC SER - ONLY CHECKED ITEMS ARE API | PLICABL |
| X The Licensee (has/has-not) provid | ed a response to the SER concerns. | |
| X The Licensee (has/has not) specif qualified and/as will function wh environmental service conditions. | ically stated that the equipment is en exposed to the applicable DBE | |
| The Licensee has presented inform outstanding qualification deficie | ation which shows there are no ncies. | |
| The Licensee (has/has not) propos item whose qualification has not | ed a corrective action for this equipeen fully established. | ipment |
| Justification for interim ope Licensee for this equipment i | ration (has/has not) been provided tem. | by the |
| Corrective action specified b | y the Licensee: | |
| Equipment replacement wit Equipment modification Equipment relocation abov Relocate or shield equipm Verify qualification by a Equipment relocation to a Qualification testing of Other (| th qualified equipment re submergence level ment from radiation source additional (testing/analysis) a mild environment equipment in progress |) |
| The Licensee has provided oth that can be construed as a ba operation. | ner information for this equipment i asis for justification for interim | tem |
| The Licensee (has/has not) pr corrective action. (Schedule action | covided a schedule for the proposed e for accomplishing the corrective | .) |
| The Licensee states that the equi and/or should be exempted from er | ipment item does not require qualifinvironmental qualification. | cation |
| DESIGNATION OF RESULTANT NRC QUALIFIC - CIRCLED ITEM ONLY: (See Section 3 | CATION EVALUATION CATEGORY BASED ON of this TER for Legend) | REVIEW |
| I.a Qualified I.b Modification II.a Qualification Not Established II.b Not Qualified | II.c Qualified Life Deficiency III.a Exempt III.b Not in Scope IV Documentation Not Availabl | .e |
| | | |
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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 35

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

| | DESIGNATION: |
|--|----------------|
| NRC REQUIREMENTS | A - DEFICIENCI |
| Documented Evidence of Qualification Adequate | |
| Adequate Similarity Between Equipment and Test Specimen Establ | ished X |
| Aging Degradation Evaluated Adequately | |
| Qualified Life or Replacement Schedule Established (If Require | (b) |
| Program Established to Identify Aging Degradation | |
| Criteria Regarding Aging Simulation Satisfied (If Required) | |
| Criteria Regarding Temperature/Pressure Exposure: | |
| o Peak Temperature Adequate | |
| o Peak Pressure Adequate | |
| o Duration Adequate | |
| o Required Profile Enveloped Adequately | |
| o Steam Exposure (If Required) Adequate | |
| Criteria Regarding Spray Satisfied | |
| Criteria Regarding Submergence Satisfied | |
| Criteria Regarding Radiation Satisfied | _X_ |
| Criteria Regarding Test Sequence Satisfied | |
| Criteria Regarding Test Failures or Severe Anomalies | |
| (If Any) Satisfied | |
| Criteria Regarding Functional Testing Satisfied | |
| Criteria Regarding Instrument Accuracy Satisfied | |
| Test Duration Margin (1 hour + Function Time) Satisfied | |
| Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I) | |
| | |

NRC QUALIFICATION CATEGORY

DESIGNATION: X = CATEGORY

| I.a | Equipment Qualified | |
|-------|--|-----|
| I.b | Equipment Qualification Pending Modification | |
| II.a | Equipment Qualification Not Established | _X_ |
| II.b | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life | |
| | or Replacement Schedule Justified | - |
| III.a | Equipment Exempt From Qualification | |
| III.b | Equipment Not in the Scope of the Qualification Review | |
| IV | Documentation Not Made Available | |
| | | |

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NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. _____45

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NOTES: 3 a and 5 a item 34 app trough h of Equipment *

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 36

Equipment Item No. 36 Electric Cables Located Outside Containment Kerite Co., Cable Type HT Control Cable, Provides Electrical Distribution Licensee References 10, 34, 574, and 2052 Required Operating Time: Long term TER Checksheet No. 36 Reference 59, Section 4.3.3.3 Licensee Submittal: Page 6 [62]; Table 3, Page 6 [1]; FRC SCEW 38

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

R, T, QT, RT, P, H, CS, (A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

Not stated, Not applicable

LISTING OF APPLICABLE CHECKSHEETS:

| Contents | Chee | ckshe | eet 1 | Page | No. | |
|---|--------------|-------|-------|------------|-----|-----|
| Equipment Item | la | | | | | |
| Summary of Licensee Responses to the NRC SER | lb | | | | | |
| Equipment Environmental Qualification Summary Forms | 2 | | | | | |
| Licensee kesponse to NRC SER | 3a, | 3,00 | 3×, | 38 | | |
| System Consideration Review | 44, | ж, | ₩, | <u>م</u> م | ₩. | × |
| Equipment Environmental Qualification Review | 500 | ж, | 5×1, | 58, 59 | 56, | 5£, |
| Installed TMI Lessons Learned Implementation Equipment Summary | 6 A , | × | | | | |
| Maintenance and Replacement Schedule Summary | 7A. | 76, | × | | | |

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| SUMMARY OF LICENSEE RESPONSES TO THE N | RC SER - ONLY CHECKED ITEMS ARE APPLICABLE: |
|--|--|
| X The Licensee (has/has not) provided | d a response to the SER concerns. |
| The Licensee (has/has not) specific qualified and/ar will function when environmental service conditions. | cally stated that the equipment is n exposed to the applicable DBE |
| X The Licensee has presented information outstanding qualification deficient | tion which shows there are no cies. |
| The Licensee (has/has not) proposed item whose qualification has not be | d a corrective action for this equipment een fully established. |
| Justification for interim oper Licensee for this equipment it | ation (has/has not) been provided by the em. |
| Corrective action specified by | the Licensee: |
| Equipment replacement with Equipment modification Equipment relocation above Relocate or shield equipme Verify qualification by ad Equipment relocation to a Qualification testing of e Other (| <pre>submergence level nt from radiation source ditional (testing/analysis) mild environment quipment in progress)</pre> |
| — The Licensee has provided othe that can be construed as a bas operation. | er information for this equipment item is for justification for interim |
| The Licensee (has/has not) pro corrective action. (Schedule action | ovided a schedule for the proposed for accomplishing the corrective .) |
| The Licensee states that the equip and/or should be exempted from env | oment item does not require qualification vironmental qualification. |
| DESIGNATION OF RESULTANT NRC QUALIFICA - CIRCLED ITEM ONLY: (See Section 3 of | ATION EVALUATION CATEGORY BASED ON REVIEW of this TER for Legend) |
| Qualified I.b Modification II.a Qualification Not Established II.b Not Qualified | <pre>II.c Qualified Life Deficiency III.a Exempt III.b Not in Scope IV Documentation Not Available</pre> |
| | |

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DESIGNATION: X = DEFICIENCY

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 36

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

NRC REQUIREMENTS

Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

NRC QUALIFICATION CATEGORY

DESIGNATION: X = CATEGORY

| lified | _X_ |
|--|-----|
| lification Pending Modification | |
| lification Not Establ.shed | |
| Qualified | |
| isfies All Requirements Except Qualified Li | ife |
| t Schedule Justified | |
| mpt From Qualification | |
| in the Scope of the Qualification Review | |
| Not Made Available | |
| t Schedule Justified mpt From Qualification in the Scope of the Qualification Review Not Made Available | |

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Franklin Research Center A ' ivision of The Franklin Institute 20th and Race Streets. Phila., Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 36

LICENSEE RESPONSE TO NRC SER

Item 4.3.3.3 addresses Kerite power cable outside containment. The FRC "Conclusion" notes that a conservative qualified life should be determined. Yet the FRC "Evaluation" states that thermal aging does not simulate all aging conditions to which the cable would be subjected, and thus disagrees with the RG&E establishment of a 93.3 year life at 140°F based on Arrhenius data. Since the DOR Guidelines address only thermal and radiation aging, and since both of these concerns have been addressed for this cable, no additional information should be required for resolution of this item.

Since this cable is safety-related electrical equipment, Reference 72 concering maintenance/surveillance applies.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 32

Equipment Item No. 37 Electrical Cable Located Inside Containment (Area #1) Coleman Cable Co. Instrumentation Cables Licensee References 29 and 2052 Required Operating Time: Long term TER Checksheet No. 37 Reference 59, Section 4.5.2.7 Licensee Submittal: Page 9 [62]; Table 3, Page 6 [1]; FRC SCEW 39

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

(R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

Not stated, Not applicable

LISTING OF APPLICABLE CHECKSHEETS:

| Contents | Chec | kshe | et F | age | No. | |
|---|------------|------------|------------|-----|------|-----|
| Equipment Item | la | | | | | |
| Summary of Licensee Responses to the NRC SER | lb | | | | | |
| Equipment Environmental Qualification Summary Forms | 2 | | | | | |
| Licensee Response to NRC SER | 3a, | 36, | 36, | 34 | | |
| System Consideration Review | 48. | ₩, | ₩, | 殃, | ¥, | ₩ |
| Equipment Environmental Qualification Review | 5a, 53, | 5%, 54, | se, Si, | ×, | \$e, | 5£, |
| Installed TMI Lessons Learned Implementation Equipment Summary | 64, | 96 | | | | |
| Maintenance and Replacement Schedule Summary | うえ, | 76, | 7\$ | | | |

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| FRC Project No. C5257 | |
| FRC Assignment No. 13 | |
| FRC Task No. 454 | |

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|-----|---|
| Ib | |

| SUMMARY OF LICENSEE RESPONSES TO THE N | RC SER - ONLY CHECKED ITEMS ARE APPLICABLE |
|---|--|
| X The Licensee (has/has not) provide | d a response to the SER concerns. |
| <u>X</u> The Licensee (has/has not) specifi qualified and and will function whe environmental service conditions. | cally stated that the equipment is en exposed to the applicable DBE |
| \underline{X} The Licensee has presented informa outstanding qualification deficien | tion which shows there are no ncies. |
| The Licensee (has/has not) propose item whose qualification has not b | ed a corrective action for this equipment been fully established. |
| Justification for interim oper Licensee for this equipment it | ation (has/has not) been provided by the em. |
| Corrective action specified by | the Licensee: |
| Equipment replacement with Equipment modification Equipment relocation above Relocate or shield equipme Verify qualification by ad Equipment relocation to a Qualification testing of e | a qualified equipment e submergence level ent from radiation source dditional (testing/analysis) mild environment equipment in progress |
| The Licensee has provided othe that can be construed as a bas operation. | er information for this equipment item sis for justification for interim |
| corrective action. (Schedule action | for accomplishing the corrective .) |
| The Licensee states that the equip and/or should be exempted from env | pment item does not require qualification vironmental qualification. |
| DESIGNATION OF RESULTANT NRC QUALIFICA - CIRCLED ITEM ONLY: (See Section 3 (| ATION EVALUATION CATEGORY BASED ON REVIEW of this TER for Legend) |
| I.a Qualified I.b Modification II.a Qualification Not Established | III.a Exempt III.b Not in Scope |
| II.b Not Qualified | IV Documentation Not Available |

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 37

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

NRC REQUIREMENTS

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DESIGNATION: X = DEFICIENCY

| Documented Evidence of Qualification Adequate | |
|---|--|
| Adequate Similarity Between Equipment and Test Specimen Established | |
| Aging Degradation Evaluated Adequately | |
| Qualified Life or Replacement Schedule Established (If Required) | |
| Program Established to Identify Aging Degradation | |
| Criteria Regarding Aging Simulation Satisfied (If Required) | |
| Criteria Regarding Temperature/Pressure Exposure: | |
| o Peak Temperature Adequate | |
| o Peak Pressure Adequate | |
| o Duration Adequate | |
| o Required Profile Enveloped Adequately | |
| o Steam Exposure (If Required) Adequate | |
| Criteria Regarding Spray Satisfied | |
| Criteria Regarding Submergence Satisfied | |
| Criteria Regarding Radiation Satisfied | |
| Criteria Regarding Test Sequence Satisfied | |
| Criteria Regarding Test Failures or Severe Anomalies | |
| (If Any) Satisfied | |
| Criteria Regarding Functional Testing Corisfica | |
| Criteria Regarding Instrument Accuracy Satisfied | |
| | |

(If Any) Satisfied Criteria Regarding Functional Testing Corisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

NRC QUALIFICATION CATEGORY

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DESIGNATION: X = CATEGORY

P I

| I.a | Equipment Qualified | |
|-------|---|------------|
| I.b | Equipment Qualification Pending Modification | |
| II.a | Equipment Qualification Not Established | |
| II.b | Fquipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life or Replacement Schedule Justified | _ <u>×</u> |
| III.a | Equipment Exempt From Qualification | |
| III.b | Equipment Not in the Scope of the Qualification Review | |
| IV | Documentation Not Made Available | |

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 37

LICENSEE RESPONSE TO NRC SER

Item 4.5.2.7 addresses Coleman cable located inside containment. The major concern expressed in the TER is that the radiation dose to which this cable was exposed during radiation testing could not be quantified. Although this observation may be correct, it is apparent that a lower limit on the amount of radiation received can be easily estimated.

The radiation source during the test consisted of a plaque array of Cobalt-60 elements approximately 60 inches by 72 inches wide. The only significant attenuation of the gamma flux was due to a 1/2" steel plate. For 1.33 MeV gamma, the attenuation factor for 1/2" steel is conservatively (collimated beam without buildup) calculated as about 0.60. The actually measured integrated dose at the back of the crate top was $6.93 \times 10'$ rads. Thus, a conservative estimate of the lower bound of the cable radiation dose received is $4.1_{-}\times 10'$ rads. This is appreciably higher than the 2 $\times 10'$ rads required by the DOR Guidelines. The DOR Guidelines are thus met.

As noted earlier, RG&E believes that the beta dose rate concerns of Appendix H go beyond the requirements of the DOR Guidelines, and are inappropriate for review in this document.

Based on the above information, RG&E considers that the DOR Guidelines are met for this cable.



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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 38

Equipment Item No. 38 Electrical Cables Located Outside Containment Coleman Cable Co. Provides Electrical Distribution Licensee Peferences 29 and 2052 Required Operating Time: Long term TER Checksheet No. 38 Reference 59, Section 4.5.2.8 Licensee Submittal: Page 10 [62]; Table 3, Page 6 [1]; FRC SCEW 40

e Section 3 of this TER for Legend) (R,) T, QT', RT, P, H, CS, (A,) S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None, Not stated, Not applicable LISTING OF APPLICABLE CHECKSHEETS: Checksheet Page No. Contents la Equipment Item lb Summary of Licensee Responses to the NRC SER 2 Equipment Environmental Qualification Summary Forms 3a, 36, 36, 38. Licensee Response to NRC SER 弦,死,张,短,残,天 System Consideration Review 50, 50, 50, 50, 50, 50, 50, Equipment Environmental Qualification Review 59, 54, 54, 54 前,前 Installed TMI Lessons Learned Implementation Equipment Summary 76, 76, 26 Maintenance and Replacement Schedule Summary

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY:
A Division of The Franklin Institute 20th and Race Streets, Phila., Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>45</u>4

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 38

| SUMMARY OF LICENSEE RESPONSES TO THE NRC SER - ONLY CHECKED ITEMS ARE APPLICABLE: |
|---|
| |
| X The Ligensee (has (here the) provided a response to the SPP concerns |
| The Licensee (has/has hot) provided a response to the SER concerns. |
| X The Licensee (has/has not) specifically stated that the equipment is |
| qualified and/or will function when exposed to the applicable DBE |
| environmental service conditions. |
| The Ligensee has presented information which shows there are no |
| outstanding gualification deficiencies. |
| |
| X The Licensee (has/has not) proposed a corrective action for this equipment |
| item whose qualification has not been fully established. |
| Justification for interim operation (has/has not) been provided by the |
| Licensee for this equipment item. |
| brochbee for thre equipment recm. |
| X Corrective action specified by the Licensee: |
| |
| Equipment replacement with qualified equipment |
| Equipment relocation above submergence level |
| Relocate or shield equipment from radiation source |
| Verify qualification by additional (testing/analysis) |
| Equipment relocation to a mild environment |
| Qualification testing of equipment in progress |
| X Other (verify radiation resistance of cable) |
| The Licensee has provided other information for this equipment item |
| that can be construed as a basis for justification for interim |
| operation. |
| X The Licensee (has not) provided a schedule for the proposed |
| corrective action. (Schedule for accomplishing the corrective |
| action) |
| |
| The Licensee states that the equipment item does not require qualification |
| and/or should be exempted from environmental qualification. |
| DESIGNATION OF RESULTANT NRC QUALIFICATION EVALUATION CATEGORY BASED ON REVIEW |
| - CIRCLED ITEM ONLY: (See Section 3 of this TER for Legend) |
| |
| I.a Qualified II.c Qualified Life Deficiency |
| (II a) Qualification Not Established III h Not in Scope |
| IL b Not Qualified IV Documentation Not Available |
| |
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| |
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Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 38

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

DESIGNATION: X = DEFICIENCYNRC REQUIREMENTS Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

DESIGNATION: X = CATEGORY

NRC QUALIFICATION CATEGORY

I.a Equipment Qualified I.b Equipment Qualification Pending Modification II.a Equipment Qualification Not Established II.b Equipment Not Qualified II.c Equipment Satisfies All Requirements Except Qualified Life or Replacement Schedule Justified III.a Equipment Exempt From Qualification III.b Equipment Not in the Scope of the Qualification Review IV Documentation Not Made Available

This equipment item was previously evaluated in Reference 59. See page 1A Equipment Item description.

A Division of The Franklin Institute 20th and Race Streets. Phila., Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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3a

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 38

LICENSEE RESPONSE TO NRC SER

Item 4.5.2.8 and 4.5.2.9 address electrical cables located outside containment. A preliminary evaluation of the expected post-accident dose has been made, based on the information provided in RG&E October 31, 1980 submittal, Accident Reference [TMI-3]. It is expected that the integrated dose three feet from the recirculation piping would be less than 3 x 10 rads. The cables in question are further from the source.

Information presented in draft EPRI Report 1707-3, "Radiation Effects on Organic Materials in Nuclear Plants," cites a radiation threshold for PVC (the materials of the cables in question) of 5 x 10 rads. It is thus not expected that any damage potential exists.

RG&E has not yet completed confirmation of this issue. When completed and verified, proper documentation will be made available for NRC staff review.

A Division of The Franklin Institute 20th and Race Streets. Phila., Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 39

Equipment Item No. 39 Electrical Cables Located Outside Containment Rome Cable Co. Licensee References 9, 29, and 2052 Required Operating Time: Long term TER Checksheet No. 39 Reference 59, Section 4.5.2.8 Licensee Submittal: Page 9 [62]; Table 3, Page 7 [1]; FRC SCEW 41

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

(R,) T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

Not stated, Not applicable

2

3

LISTING OF APPLICABLE CHECKSHEETS:

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|---|------------|------------|-------|------|-----|----|
| Equipment Item | la | | | | | |
| Summary of Licensee Responses to the NRC SER | lb | | | | | |
| Equipment Environmental Qualification Summary Forms | 2 | | | | | |
| Licensee Response to NRC SER | 3a, | 316, | ж, | 36 | | |
| System Consideration Review | 动。 | ж, | ¥., | ₩., | ¥6, | ≫ |
| Equipment Environmental Qualification Review | 54, 99, | 36, 38, | XX, | ×, | ¥e, | ×, |
| Installed TMI Lessons Learned Implementation Equipment Summary | ō,a, | 3K | | | | |
| Maintenance and Replacement Schedule Summary | 74. | 26. | 70 | | | |

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| A Division of The Franklin Institute 20th and Race Streets. Phila. Pa 19103 (215) 448-1000 | NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No | Page Ib |
|---|--|------------|
| EQUIPMENT ENVIRONMENTAL QUALIFIC | CATION REVIEW OF EQUIPMENT ITEM N | 10. 39 |
| SUMMARY OF LICENSEE RESPONSES TO THE | NRC SER - ONLY CHECKED ITEMS ARE APPI | LICABLE |
| X The Licensee (has/has not) provid | ed a response to the SER concerns. | |
| X The Licensee (has/has not) specif qualified and/or will function wh environmental service conditions. | ically stated that the equipment is en exposed to the applicable DBE | |
| The Licensee has presented inform outstanding qualification deficie | ation which shows there are no ncies. | |
| The Licensee (has/has not) propos item whose qualification has not | ed a corrective action for this equip been fully established. | pment |
| Justification for interim ope Licensee for this equipment i | ration (has/has not) been provided by tem. | / the |
| \underline{X} Corrective action specified b | by the Licensee: | |
| Equipment replacement wit Equipment modification Equipment relocation abov Relocate or shield equipm Verify qualification by a Equipment relocation to a Qualification testing of X Other (<u>Verify</u> radia) | th qualified equipment we submergence level ment from radiation source additional (testing/analysis) a mild environment equipment in progress rion resistance of Cable |) |
| The Licensee has provided oth that can be construed as a ba operation. | ner information for this equipment ite asis for justification for interim | em |
| _X The Licensee (tass/has not) pr corrective action. (Schedule action | ovided a schedule for the proposed for accomplishing the corrective . |) |
| The Licensee states that the equi and/or should be exempted from en | ipment item does not require qualific nvironmental qualification. | ation |
| DESIGNATION OF RESULTANT NRC QUALIFIC - CIRCLED ITEM ONLY: (See Section 3 | CATION EVALUATION CATEGORY BASED ON R of this TER for Legend) | EVIEW |
| I.a Qualified I.b Modification II.a Qualification Not Established II.b Not Qualified | II.c Qualified Life Deficiency III.a Exempt III.b Not in Scope IV Documentation Not Available | |
| | | |

A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 39

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

| | DESIGNATION: |
|--|----------------|
| NRC REQUIREMENTS | A - DEFICIENCE |
| Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Establi Aging Degradation Evaluated Adequately | shed |
| Oualified Life or Replacement Schedule Established (If Required |) <u>X</u> |
| Program Established to Identify Aging Degradation | |
| Criteria Regarding Aging Simulation Satisfied (If Required) | |
| Criteria Regarding Temperature/Pressure Exposure: | |
| o Peak Temperature Adequate | |
| o Peak Pressure Adequate | |
| o Duration Adequate | |
| Required Profile Enveloped Adequately | |
| o Steam Exposure (If Required) Adequate | |
| Criteria Regarding Spray Satisfied | |
| Criteria Regarding Submergence Satisfied | |
| Criteria Regarding Radiation Satisfied | _X |
| Criteria Regarding Test Sequence Satisfied | |
| Criteria Regarding Test Failures or Severe Anomalies | |
| (If Any) Satisfied | |
| Criteria Regarding Functional Testing Satisfied | |
| Criteria Regarding Instrument Accuracy Satisfied | |
| Test Duration Margin (I nour + Function Time) Satisfied | |
| Criteria Regarding Margins Satisfied (NUREG-0588, Cat. 1) | |

DESIGNATION: X = CATEGORY

NRC QUALIFICATION CATEGORY

| I.a | Equipment Qualified | |
|-------|---|---|
| I.b | Equipment Qualification Pending Modification | |
| II.a | Equipment Qualification Not Established | X |
| II.b | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life or Replacement Schedule Justified | |
| III.a | Equipment Exempt From Qualification | |
| III.D | Equipment Not in the Scope of the Qualification Review | |
| IV | Documentation Not Made Available | |

This equipment item was previously evaluated in Reference 59. See page 1A Equipment Item description.

Franklin Research Center A Division of The Franklin institute 20th and Race Streets. Phila. Pa. 19103 (210) 448-1000 NRC Contract No. NAC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 39

LICENSEE RESPONSE TO NKC SER

Item 4.5.2.8 and 4.5.2.9 address electrical cables located outside containment. A preliminary evaluation of the expected post-accident dose has been made, based on the information provided in RG&E October 31, 1980 submittal, Accident Reference [TMI-3]. It is expected that the integrated dose three feat from the recirculation piping would be less than 3 x 10⁻ wads. The cables in question are further from the source.

Information presented in draft EPRI Report 1707-3, "Radiation Effects on Organic Materials in Nuclear Plants," cites a radiation threshold for PVC (the materials of the cables in Guestion) of 5 x 10° fads. It is thus not expected that any damage potential exists.

RG&E has not yet completed confirmation of this issue. When completed and verified, proper documentation will be made available for NRC staff review. Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. ______454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 40

Equipment Item No. 40 Electrical Cables Located Outside Containment General Cable Co. Licensee References 9, 29, and 2052 Required Operating Time: Long term TER Checksheet No. 40 Reference 59, Section 4.5.2.9 Licensee Submittal: Page 10 [62]; FRC SCEW 42

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend) (R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

Not stated, Not applicable

LISTING OF APPLICABLE CHECKSHEETS:

Checksheet Page No. Contents Equipment Item la Summary of Licensee Responses to the NRC SER lb Equipment Environmental Qualification Summary Forms 2 3a, 38, 36, 34 Licensee Response to NRC SER 秋秋、秋、秋、秋、秋 System Consideration Review Equipment Environmental Qualification Review 荡, 死, 死, 死, 天, 天, 54, X, X, X Installed TMI Lessons Learned Implementation Da, Da Equipment Summary

(1)

Maintenance and Replacement Schedule Summary

26, 76, 76

| A Division of The Franklin Institute 20th and Rece Streets. Phila , Pa 19103 (215) 448-1000 | NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No | Page 1b |
|--|--|-----------------|
| EQUIPMENT ENVIRONMENTAL QUALIFIC | CATION REVIEW OF EQUIPMENT ITEN | и NO. <u>чо</u> |
| SUMMARY OF LICENSEE RESPONSES TO THE | NRC SER - ONLY CHECKED ITEMS ARE A | PPLICABLE |
| X The Licensee (has/has not) provid | led a response to the SER concerns. | |
| X The Licensee (has/has not) specific qualified and/or will function when vironmental service conditions. | ically stated that the equipment is nen exposed to the applicable DBE | 3 |
| The Licensee has presented inform outstanding qualification deficie | nation which shows there are no encies. | |
| X The Licensee (has/has not) propos item whose qualification has not | ed a corrective action for this equipeen fully established. | ipment |
| Justification for interim ope Licensee for this equipment i | ration (has/has not) been provided tem. | by the |
| X Corrective action specified b | y the Licensee: | |
| Equipment replacement with Equipment modification Equipment relocation above Relocate or shield equipm Verify qualification by a Equipment relocation to a Qualification testing of X Other (verify radiation | h qualified equipment e submergence level ent from radiation source dditional (testing/analysis) mild environment equipment in progress on resistance of Cable | , |
| The Licensee has provided other that can be construed as a ba operation. | er information for this equipment i sis for justification for interim | tem |
| X The Licensee (has not) pro- corrective action. (Schedule action | ovided a schedule for the proposed for accomplishing the corrective | .) |
| The Licensee states that the equipand/or should be exempted from en | pment item does not require qualifi vironmental qualification. | cation |
| - CIRCLED ITEM GNLY: (See Section 3 | of this TER for Legend) | REVIEW |
| I.a Qualified I.b Modification II.a Qualification Not Established II.b Not Qualified | II.c Qualified Life Deficiency III.a Exempt III.b Not in Scope IV Documentation Not Availabl | e |
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Franklin Research Center A Division of The Franklin Institute

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20th and Race Streets. Phila., Pa. 19103 (215) 448-1000

| NRC Contract No. NRC-03-79-118 |
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| FRC Project No. C5257 |
| FRC Assignment No. 13 |
| FRC Task No. 454 |

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 40

EQUIPMENT ENVIRONMENTAL QUALIFICATION JUMMARY FORM

| NRC REQUIREMENTS | DESIGNATION: X = DEFICIENCY |
|--|--------------------------------|
| NRC REQUIREMENTS Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Establis Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfi 1 (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Submergence Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied | ashed |
| Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I) | |
| NRC QUALIFICATION CATEGORY | DESIGNATION: X = CATEGORY |
| I.a Equipment Qualified I.b Equipment Qualification Pending Modification II.a Equipment Qualification Not Established | |

This equipment item was previously evaluated in Reference 59. See page 1A Equipment Item description.

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A Division of The Franklin Institute 20th and Race Streets, Phila., Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 5/0

LICENSEE RESPONSE TO NRC SER

Item 4.5.2.8 and 4.5.2.9 address electrical cables located outside containment. A preliminary evaluation of the expected post-accident dose has been made, based on the information provided in RG&E October 31, 1980 submittal, Accident Reference [TMI-3]. It is expected that the integrated dose three_feet from the recirculation piping would be less than 3 x 10 rads. The cables in question are further from the source.

Information presented in draft EPRI Report 1707-3, "Radiation Effects on Organic Materials in Nuclear Plants," cites a radiation threshold for PVC (the materials of the cables in question) of 5 x 10 rads. It is thus not expected that any damage potential exists.

RG&E has not yet completed confirmation of this issue. When completed and verified, proper documentation will be made available for NRC staff review.

Franklin Research Center A Division of The Franklin Institute 20th and Race Streets, Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 41

Equipment Item No. 41 Level Transmitter Located in Auxiliary Building (Area #2) Foxboro Model 611 GM-ASI RWST Level (LT-920) Licensee reference not cited Required Operating Time: Short term (before sump recirculation) TER Checksheet No. 41 Reference 59, Section 4.3.1.3 Licensee Submittal: Page 5 [62]; Table 3, Page 7 [1]; FRC SCEW 43

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend) R, T, QT, RT, P, H, CS, (A,) S, ((R)), M, I, QM, RPN, EXN, SEN, QI, RPS, None, Not stated, Not applicable LISTING OF APPLICABLE CHECKSHEETS: Checksheet Page No. Contents la Equipment Item 1b Summary of Licensee Responses to the NRC SER Equipment Environmental Qualification Summary Forms 2 3a, 36, 36, 36 Licensee Response to NRC SER 致, 秋, 秋, 风, 秋, 秋 System Consideration Review 34, 36, 36, 34, 36, 关, Equipment Environmental Qualification Review 39, 30, 34, 35 8á, 16 Installed TMI Lessons Learned Implementation Equipment Summary 70, 76, 72 Maintenance and Replacement Schedule Summary

| A Division of The Franklin Institute 20th and Race Streets. Phila . Pa 19103 (215) 448-1000 | NRC Contract No. N FRC Project No. C52 FRC Assignment No. FRC Task No. |
|--|---|
| EQUIPMENT ENVIRONMENTAL QUALIFIC | CATION REVIEW OF |

RC-03-79-118 257). 13 54

EQUIPMENT ITEM NO. 4/1

SUMMARY OF LICENSEE RESPONSES TO THE NRC SER - ONLY CHECKED ITEMS ARE APPLICABLE:

- X The Licensee (has/has not) provided a response to the SER concerns.
- The Licensee (has/has not) specifically stated that the equipment is qualified and/or will function when exposed to the applicable DBE environmental service conditions.
- The Licensee has presented information which shows there are no outstanding qualification deficiencies.
- X The Licensee (has/has not) proposed a corrective action for this equipment item whose qualification has not been fully established.
 - Justification for interim operation (has/has not) been provided by the Licensee for this equipment item.
 - X Corrective action specified by the Licensee:
 - X Equipment replacement with gualified equipment
 - Equipment modification
 - Equipment relocation above submergence level
 - Relocate or shield equipment from radiation source
 - Verify qualification by additional (testing/analysis)
 - Equipment relocation to a mild environment
 - Qualification testing of equipment in progress
 - Other (
 - The Licensee has provided other information for this equipment item that can be construed as a basis for justification for interim operation.
 - X The Licensee (has/has not) provided a schedule for the proposed corrective action. (Schedule for accomplishing the corrective action June 30, 1982 .)
- The Licensee states that the equipment item does not require qualification and/or should be exempted from environmental gualification.

DESIGNATION OF RESULTANT NRC QUALIFICATION EVALUATION CATEGORY BASED ON REVIEW - CIRCLED ITEM ONLY: (See Section 3 of this TER for Legend)

I.a Quarified (I.b) Modification II.a Qualification Not Escablished III.b Not in Scope II.b Not Qualified

II.c Qualified Life Deficiency III.a Exempt IV Documentation Not Available Franklin Research Center A Division of The Franklin Institute 20th and Race Streets, Phila . Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 454 FRC Task No.

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 4/1

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

DESIGNATION: X = DEFICIENCY

NRC REQUIREMENTS

Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied

Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

NRC QUALIFICATION CATEGORY

DESIGNATION:

X = CATEGORY

| I.a | Equipment Qualified | |
|-------|--|---|
| I.b | Equipment Qualification Pending Modification | X |
| II.a | Equipment Qualification Not Established | |
| II.b | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life | |
| | or Replacement Schedule Justified | |
| III.a | Equipment Exempt From Qualification | |
| III.D | Equipment Not in the Scope of the Qualification Review | |
| IV | Documentation Not Made Available | |

This equipment item was previously evaluated in Reference 59. See page 1A Equipment Item description.



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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 4/

LICENSEE RESPONSE TO NRC SER

In Section 4.3.1, equipment is judged to meet all applicable requirements of the DOR Guidelines except qualified life. As noted earlier, Reference 72 provides information about RG&E's surveillance/ maintenance program to meet Section 7.0 of the DOR Guidelines. Specific equipment items are ad-

4.3.1.3 - RWST Level Transmitter - to be replaced by June 30, 1982.

Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. _____454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 42

Equipment Item No. 42 Level Switch Located in Auxiliary Building (Area #2) ITT-Barton Model 289 RWST Level (LIC-921) Licensee reference not cited Required Operating Time: Short term (before sump recirculation) TER Checksheet No. 42 Reference 59, Section 4.5.2.2 Licensee Submittal: Page 7 [62]; Table 3, Page 7 [1]; FRC SCEW 44

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLEL ITEM(S) ONLY: (See Section 3 of this TER for Legend) R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None, Not stated, Not applicable

LISTING OF APPLICABLE CHECKSHEETS:

| Contents | Chec | cksh | eet 1 | Page | NO. | |
|---|----------|------|-------|---------|-----|----|
| Equipment Item | la | | | | | |
| Summary of Licensee Responses to the NRC SER | lb | | | | | |
| Equipment Environmental Qualification Summary Forms | 2 | | | | | |
| Licensee Response to NRC SER | 3a, | 36, | 36 | 34 | | |
| System Consideration Review | 4a, | 4b, | 4%, | 4d., | 44, | 48 |
| Equipment Environmental Qualification Review | ¥. %, | ××, | ×, | ¥, N | ¥, | ¥, |
| Installed TMI Lessons Learned Implementation Equipment Summary | ôna, | 56 | | | | |
| Maintenance and Replacement Schedule Summary | 24, | 26, | × | | | |

| 0.00 | | | | | | |
|------|------------------------|----------|-------|-------|-------|----------|
| | Franklin Research | Cent | er | | | |
| | A Division of The Fran | klin Ins | titut | e | | |
| | 20th and Race Streets. | Phila. | Pa | 19103 | (215) | 448-1000 |

NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 42

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|---|---|--------|
| UMMARY OF LICENSEE RESPO | INSES TO THE NRC SER - UNLI CHECKED TIEMS ARE AFEL | I CADL |
| X The Licensee (has/has | not) provided a response to the SER concerns. | |
| The Licensee (has/has qualified and/or will environmental service | not) specifically stated that the equipment is function when exposed to the applicable DBE conditions. | |
| The Licensee has pres outstanding qualifica | ented information which shows there are no ation deficiencies. | |
| The Licensee (has/has item whose qualificat | not) proposed a corrective action for this equips ion has not been fully established. | ment |
| Justification for Licensee for this | interim operation (has/has not) been provided by sequipment item. | the |
| Corrective action | specified to the Licensee: | |
| Equipment rep | placement with qualified equipment | |
| Equipment rel | ocation above submergence level | |
| Relocate or s | shield equipment from radiation source | |
| Verify qualif | ication by additional (testing/analysis) | |
| Equipment rel | ocation to a mild environment | |
| Qualification Other (| i testing of equipment in progress | _) |
| The Licensee has that can be const operation. | provided other information for this equipment iter rued as a basis for justification for interim | n |
| The Licensee (has corrective action | <pre>/nas rot) provided a schedule for the proposed . (/chedule for accomplishing the corrective)</pre> | |
| X The Licensee states t and/or should be exem | hat the equipment item does not require qualification. | tion |
| ESIGNATION OF RESULTANT CIRCLED ITEM ONLY: (Se | NRC QUALIFICATION EVALUATION CATEGORY BASED ON REV se Section 3 of this TER for Legend) | VIEW |
| .a Qualified | II.c Qualified Life Deficiency | |
| | III.a Exempt | |
| .b Modification | arrive incompe | |
| .b Modification I.a Qualification Not Es | stablished (III.D Not in Scope | |

Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. +9103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 42

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

DESIGNATION: X = DEFICIENCY NRC REQUIREMENTS Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to .dentify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately c Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

DESIGNATION: X = CATEGORY

NRC QUALIFICATION CATEGORY Equipment Qualified I.a Equipment Qualification Pending Modification I.b Equipment Qualification Not Established II.a Equipment Not Qualified II.b Equipment Satisfies All Requirements Except Qualified Life II.c or Replacement Schedule Justified III.a Equipment Exempt From Qualification III.b Equipment Not in the Scope of the Qualification Review Documentation Not Made Available IV

This equipment item was previously evaluated in Reference 59. See page 1A Equipment Item description.

A Division of The Franklin Institute 20th and Race Streets, Phila, Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 42

LICENSEE RESPONSE TO NRC SER

Item 4.5.2.2 addresses the RWST level switch. When required to perform its safety function, this item does not experience a "harsh" environment. Environmental qualification testing is thus not required. FRC has also concluded that qualification is not required. However, the maintenance/surveillance program in Reference 72 will apply to this item.

Although RG&E had originally thought to replace this item by June 30, 1982, it does not appear necessary because of its location in a "mild" environment.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 42

SYSTEM CONSIDERATION REVIEW

The Licensee has stated that this equipment item does not require environmental qualification and/or should be exempted from qualification. The Licensee's rationale has been evaluated and the reasons for concurrence/ non-concurrence with the technical basis of the Licensee's position are presented below.

Reason for Concurrence

- Equipment does not provide a safety function or mitigate the consequences of a design basis accident. Equipment Environmental Qualification is not required by the DOR Guidelines. (NRC Qualification Evaluation Category IIIa)
- X Equipment is not exposed to a harsh environment by the accident it is intended to mitigate. See note (1) on page 4b. (NRC Qualification Evaluation Category IIIb)
- Backup (equipment/system) is available which completely performs the safety function. The backup (equipment/system) is environmentally qualified and appears to meet single active failure criterion. See note (1) on page 4b. (NRC Qualification Evaluation Category IIIa)

Reason for Non-Concurrence

- Equipment does not provide a _____ Backup (equipment/system) is not fully capable of performing the intended safety function or accident mitigating function.
 - Backup (equipment/system) is not environmentally qualified and can be exposed to a hostile environment simultaneously with the primary equipment.
 - Backup (equipment/system) is subject to a potentially disabling single active failure.
 - Failure of the primary equipment can compromise the ability of other safety-related equipment to perform its specified safety function.
 - Failure of the primary equipment can result in erroneous indication which could mislead an operator.
- failure criterion. See note (1) _____ Requirement for continued functionon page 4b. (NRC Qualification ______ ing throughout the post-accident ______ period necessitates environmental ______ qualification.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 42

Reason for Concurrence

The equipment's accident mitigating function is completed prior to the onset of the hostile environment. No subsequent functions are necessary. See note (1) below. (NRC Qualification Evaluation Category IIIb)

_ Other (see page __)

- X Resultant NRC Qualification Evaluation Category (IIIa(IIIb))
- X Note 1: The Licensee (has/ has not) stated that failure of the primary equipment will not affect other safety-related equipment or cause an operator to be misled. (See page___)

Reason for Non-Concurrence

- Although backup equipment is available, it is not technically sound to relinquish defense-in-depth for this function.
- Backup (equipment/system) is not safety-related.
- This equipment is necessary for the operator to ensure an ESF system is performing its intended safety function.
- The rationale presented by the Licensee is not supported by objective technical evidence.
- Other (see page___)

LICENSEE STATEMENT

See page 3a of this checksheet.

EVALUATION OF LICENSEE STATEMENT

TER-C5257-178 Concluded that this equipment performed its safety function before being exposed to any harsh environment. At that time, the Licensee intended to replace the equipment for added assurance of postaccident monitoring. The Licensee has now determined that this is unnecessary because of its location in a mild environment.

Conclusion

I+15 agreed (with the Licensee) that replacement of this item is not necessary.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 43

Equipment Item No. 43 Flow Transmitters Located Inside Containment (Area #1) Barton Model 332 Steam Line Flow Transmitters (FT-464, 465, 474, and 475) Licensee Reterence 567 Required Operating Time: Seconds TER Checksheet No. 43 Reference 59, Section 4.6.7 Licensee Submittal: Page 12 [62]; Table 3, Page 7 [1]; FRC SCEW 45

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend) R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None, Not stated, Not applicable LISTING OF APPLICABLE CHECKSHEETS: Checksheet Page No. Contents la Equipment Item Summary of Licensee Responses to the NRC SER lb 2 Equipment Environmental Qualification Summary Forms 3a, 36, 36, 34 Licensee Response to NRC SER 4a, 4b, 4c, 4d, 4d, 4d, 4d System Consideration Review Sá, Xá, Xá, Xá, Xá, Xá, Equipment Environmental Qualification Review 34, 34, 34, 33 Installed TMI Lessons Learned Implementation 64, 00 Equipment Summary 74, 76, 76 Maintenance and Replacement Schedule Summary

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Page Ib

| UMMARY | OF LICENSEE RESPONSES TO THE N | RC SER - ONLY CHECKED ITEMS ARE APPLICABLE |
|-------------------|---|---|
| X The | Licensee (has/ has not) provide | d a response to the SER concerns. |
| The qua env | Licensee (has/has not) specifi lified and/or will function whe ironmental service conditions. | cally stated that the equipment is in exposed to the applicable DBE |
| The out | Licensee has presented informa standing qualification deficien | tion which shows there are no cies. |
| The ite | Licensee (has/has not) propose m whose qualification has not b | ed a corrective action for this equipment been fully established. |
| — | Justification for interim oper Licensee for this equipment it | ation (has/has not) been provided by the em. |
| | Corrective action specified by | the Licensee: |
| | Equipment replacement with Equipment modification | qualified equipment |
| | Equipment relocation above | e submergence level |
| | Relocate or shield equipme | ent from radiation source |
| | Equipment relocation to a | mild environment |
| | Qualification testing of e | equipment in progress |
| | Other (|) |
| X | The Licensee has provided othe that can be construed as a bas operation. | er information for this equipment item sis for justification for interim |
| | The Licensee (has/has not) pro | ovided a schedule for the proposed |
| | corrective action. (Schedule | for accomplishing the corrective |
| | action | •) |
| X The | e Licensee states that the equip d/or should be exempted from en- | pment item does not require qualification vironmental qualification. |
| DESIGNA | ATION OF RESULTANT NRC QUALIFIC | ATION EVALUATION CATEGORY BASED ON REVIEW |
| - CIRCI | LED ITEM ONLY: (See Section 3 of | of this TER for Legend) |
| I.a Qu | alified | II.c Qualified Life Deficiency |
| I.b Ma | odification | III.a Exempt |
| II.a) Qu | alification Not Established | III.b Not in Scope |
| II.b No | ot Qualified | IV Documentation Not Available |

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| NRC Contract No. NRC-03-7 | 9-118 |
|---------------------------|-------|
| FRC Project No. C5257 | |
| FRC Assignment No. 13 | |
| FRC Task No. 754 | |

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 43

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

| NRC REQUIREMENTS | DESIGNATION: X = DEFICIENCY |
|--|--------------------------------|
| and a pride of Analification Magnata | × |
| Documented Evidence of Qualification Adequate | shed X |
| Adequate Similarity between Equipment and rest operiment because | |
| Aging Degradation Evaluated Adequately | |
| Qualified Life of Replacement Schedule Established (if Regulted | |
| Program Established to identify Aging Degradation | |
| Criteria Regarding Aging Simulation Satisfied (if Required) | |
| Criteria Regarding Temperature/Pressure Exposure: | |
| o Peak Temperature Adequate | |
| o Peak Pressure Adequate | |
| o Duration Adequate | |
| o Required Profile Enveloped Adequately | |
| o Steam Exposure (If Required) Adequate | |
| Criteria Regarding Spray Satisfied | |
| Criteria Regarding Submergence Satisfied | |
| Criteria Regarding Radiation Satisfied | |
| Criteria Regarding Test Sequence Satisfied | |
| Criteria Regarding Test Failures or Severe Anomalies | |
| (If Any) Satisfied | |
| Criteria Regarding Functional Testing Satisfied | |
| Criteria Regarding Instrument Accuracy Satisfied | |
| Test Duration Margin (1 hour + Function Time) Satisfied | |
| Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I) | |
| | DESIGNATION: |
| NRC QUALIFICATION CATEGORY | X = CATEGORY |

Equipment Qualified I.a ____ Equipment Qualification Pending Modification I.b Equipment Qualification Not Established II.a Equipment Not Qualified II.b Equipment Satisfies All Requirements Except Qualified Life II.c or Replacement Schedule Justified Equipment Exempt From Qualification III.a Equipment Not in the Scope of the Qualification Review III.b IV Documentation Not Made Available

This equipment item was previously evaluated in Reference 59. See page 1A Equipment Item description.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 43

LICENSEE RESPONSE TO NRC SER

Item 4.6.7 addresses steam line flow transmitters inside containment. In RG&E's October 31, 1980 submittal, we stated that we planned to replace these transmitters by June 30, 1982. However, it is not clear that replacement is required. As stated by RG&E previously, these transmitters are not required to perform a safety function during an

HELB, since the non-return check valves will isolate the intact steam generator from the break. The check valves are the primary isolation means, since they operate more quickly (1-2 seconds) than the 5 second MSIV's. For a large break inside containment, the containment pressure transmitters will signal the MSIV's to close. A steam line break analysis presently being performed by the NRC for SEP Topics VI-2.D and VI-3 will be completed soon. RG&E will at that time be able to define if the containment pressure transmitters will serve as a suitable backup for the steam line flow transmitters, in the event of a steam line break. A Division of The Franklin Institute 20th and Race Streets, Phila, Pa, 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 43

SYSTEM CONSIDERATION REVIEW

The Licensee has stated that this equipment item does not require environmental qualification and/or should be exempted from qualification. The Licensee's rationale has been evaluated and the reasons for <u>concurrence</u>/ non-concurrence with the technical basis of the Licensee's position are presented below.

Reason for Concurrence

- _____ Equipment does not provide a safety function or mitigate the consequences of a design basis accident. Equipment Environmental Qualification is not required by the DOR Guidelines. (NRC Qualification Evaluation Category IIIa)
- Equipment is not exposed to a harsh environment by the accident it is intended to mitigate. See note (1) on page 4b. (NRC Qualification Evaluation Category IIIb)
- Backup (equipment/system) is available which completely performs the safety function. The backup (equipment/system) is environmentally qualified and appears to meet single active failure criterion. See note (1) on page 4b. (NRC Qualification Evaluation Category IIIa)

Reason for Non-Concurrence

- Backup (equipment/system) is not fully capable of performing the intended safety function or accident mitigating function.
- Backup (equipment/system) is not environmentally qualified and can be exposed to a hostile environment simultaneously with the primary equipment.
- Backup (equipment/system) is subject to a potentially disabling single active failure.
- Failure of the primary equipment can compromise the ability of other safety-related equipment to perform its specified safety function.
 - Failure of the primary equipment can result in erroneous indication which could mislead an operator.
 - Requirement for continued functioning throughout the post-accident period necessitates environmental qualification.

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NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 4.54

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 43

Reason for Concurrence

- The equipment's accident mitigating function is completed prior to the onset of the hostile environment. No subsequent functions are necessary. See note (1) below. (NRC Qualification Evaluation Category IIIb)
- Other (see page)
- Resultant NRC Qualification Evaluation Category (IIIa/IIIb)
- Note 1: The Licensee (has/ has not) stated that failure of the primary equipment will not affect other safety-related equipment or cause an operator X Other (see page 4b) to be misled. (See page)

Reason for Non-Concurrence

- Although backup equipment is available, it is not technically sound to relinguish defense-in-depth for this function.
- Backup (equipment/system) is not safety-related.
- This equipment is necessary for the operator to ensure an ESF system is performing its intended safety function.
- The rationale presented by the Licensee is not supported by objective technical evidence.

LICENSEE STATEMENT

See page 3a of this checksheet.

EVALUATION OF LICENSEE STATEMENT

An evaluation of this item is not presently possible since the Licensee's determination of the status of these transmitters is awaiting completion of the steam line break analysis. These transmitters are considered as requiring environmental qualification until such time as a contrary determination is made.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 44

Equipment Item No. 44 Pressure Transmitters Located in Intermediate Building ITT-Barton Model 332 Containment Pressure Transmitters (PT-945, 946, 947, 948, and 949) Licensee Reference 567 Required Operating Time: Long term TER Checksheet No. 44 Reference 59, Section 4.6.8 Licensee Submittal: Page 13 [62]; Table 3, Page 7 [1]; FRC SCEW 46

 DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY:

 (See Section 3 of this TER for Legend)

 R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, (QI), RPS, None,

 Not stated, Not applicable

 LISTING OF APPLICABLE CHECKSHEETS:

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| UIPMENT | ENVIRONMENTAL QUALIFICA | TION REVIEW | OF EQUIPMENT ITEM NO | D. <u>44</u> |
| alter (na se | | | | |
| UMMARY OF | LICENSEE RESPONSES TO THE N | RC SER - ONLY | CHECKED ITEMS ARE APPLI | CABL |
| X The Lic | ensee (has/ has not) provided | d a response | to the SER concerns. | |
| The Lic qualifi environ | ensee (has/has not) specific ed and/or will function when mental service conditions. | cally stated n exposed to | that the equipment is the applicable DBE | |
| The Lic outstan | ensee has presented information deficient | tion which sh cies. | ows there are no | |
| The Lic item wh | ensee (has/has not) propose ose qualification has not b | d a correctiv een fully est | e action for this equipm ablished. | ent |
| Jus Lic | tification for interim oper ensee for this equipment it | ation (has/ha em. | s not) been provided by | the |
| Cor | rective action specified by | the Licensee | • | |
| = | Equipment replacement with Equipment modification | qualified eq | uipment | |
| | Relocate or shield equipme | nt from radia | ation source | |
| _ | Verify qualification by ad | ditional (tes | sting/analysis) | |
| | Equipment relocation to a | mild environm | nent | |
| _ | Qualification testing of e Other (| quipment in p | progress | _) |
| The that ope | Licensee has provided othe it can be construed as a bas ration. | r information is for justif | n for this equipment item fication for interim | n |
| The con act | ELicensee (has/has not) pro rective action. (Schedule tion | vided a scheo for accomplis | dule for the proposed shing the corrective .) | |
| The Lic and/or | censee states that the equip should be exempted from env | oment item do vironmental q | es not require qualification. | tion |
| DESIGNATION - CIRCLED | N OF RESULTANT NRC QUALIFIC ITEM ONLY: (See Section 3 of | TION EVALUAT of this TER f | ION CATEGORY BASED ON RE or Legend) | VIEW |
| I.a Juali | fied | II.c Qual | ified Life Deficiency | |
| I.b Modif | ication | III.a Exem | pt | |
| TT a Quali | fication Not Established | (III.b) Not | in Scope | |
| TT'4 Angrt | | | | |

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 44

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

DESIGNATION: X = DEFICIENCY NRC REQUIREMENTS Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate • o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Euration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

NRC QUALIFICATION CATEGORY

DESIGNATION: X = CATEGORY

Equipment Qualified I.a Equipment Qualification Pending Modification I.b × Equipment Qualification Not Established II.a Equipmert Not Qualified II.b Equipment Satisfies All Requirements Except Qualified Life II.c or Replacement Schedule Justified Equipment Exempt From Qualification III.a Equipment Not in the Scope of the Qualification Review III.D IV Documentation Not Made Available

MILD ENVIRONMENT

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 44

LICENSEE RESPONSE TO NRC SER

Item 4.6.8 addresses the containment pressure transmitters located in the intermediate building. The five transmitters being replaced are those located in the auxiliary building, where the potential for higher radiation levels as a result of post-LOCA sump recirculation dictated their replacement. The intermediate building will not experience a harsh environment for an HELB inside containment, which is the only time these transmitters are required to operate. Although they would see a harsh environment as the result of an HELB in the intermediate building, they have no function to perform during such an event. It is thus considered that these two transmitters need only function in a "mild" environment. Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. _____45 4

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 45

Equipment Item No. 45 Pressure Transmitters Located Inside Containment (Area #1) Foxboro Model 611 GM-DSI Pressurizer Pressure (PT-429, 430, 431, 449) Licensee References 637 and 639 Required Operating Time: Short term TER Checksheet No. 45 Reference 59, Section 4.6.5 Licensee Submittal: Page 12 [62]; Table 3, Page 8 [1]; FRC SCEW 47

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend) (R) T, QT, RT, P, H, CS, A (S, (R), M, I, (M, RPN, EXN, SEN, QI, RPS, None,

Not stated, Not applicable

LISTING OF APPLICABLE CHECKSHEETS:

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| System Consideration Review | ¥6, | ¥é. | ¥, | * | ¥, | × |
| Equipment Environmental Qualification Review | \$4, 99, | 5%, 96, | ** | \$\$. \$ | ⊁e, | ×, |
| Installed TMI Lessons Learned Implementation Equipment Summary | Ģ∎, | 96 | | | | |
| Maintenance and Replacement Schedule Summary | ta, | 76, | 76 | | | |

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| AT OF EIGENSEE RESPONSES TO THE W | |
| (The Licensee (has/has not) provided | d a response to the SER concerns. |
| The Licensee (has/has not) specific qualified and/or will function when environmental service conditions. | cally stated that the equipment is n exposed to the applicable DBE |
| The Licensee has presented informat outstanding qualification deficient | tion which shows there are no cies. |
| X The Licensee (has/ has not) proposed item whose qualification has not be | d a corrective action for this equipment een fully established. |
| $\underline{\chi}$ Justification for interim operative Licensee for this equipment ite | ation (has/ has not) been provided by the em. |
| \underline{X} Corrective action specified by | the Licensee: |
| Equipment replacement with Equipment modification | qualified equipment |
| Relocate or shield equipme | nt from radiation source |
| Verify qualification by ad | ditional (testing/analysis) |
| Equipment relocation to a Qualification testing of e | auipment in progress |
| Other (|) |
| The Licensee has provided othe that can be construed as a bas operation. | r information for this equipment item is for justification for interim |
| X The Licensee (has/has not) pro corrective action. (Schedule action June 30, 1982 | for accomplishing the corrective .) |
| The Licensee states that the equip and/or should be exempted from env | oment item does not require qualification vironmental qualification. |
| ESIGNATION OF RESULTANT NRC QUALIFICA CIRCLED ITEM ONLY: (See Section 3 of | ATION EVALUATION CATEGORY BASED ON REVIEW of this TER for Legend) |
| | II.c Qualified Life Deficiency |
| .a Qualified | |
| .a Qualified D Modification | III.a Exempt |
| .a Qualified .b Modification I.a Qualification Not Established | III.a Exempt III.b Not in Scope |

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FRC Task No. _ 454 20th and Race Streets. Phila .. Pa. 19103 (215) 448-1000 EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 45 EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM DESIGNATION: X = DEFICIENCY NRC REQUIREMENTS Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aginy Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I) DESIGNATION: X = CATEGORY NRC QUALIFICATION CATEGORY Equipment Qualified I.a Equipment Qualification Pending Modification I.b II.a Equipment Qualification Not Established Equipment Not Qualified II.b Equipment Satisfies All Requirements Except Qualified Life II.c or Replacement Schedule Justified Equipment Exempt From Qualification íII.a Equipment Not in the Scope of the Qualification Review III.b Documentation Not Made Available VI This equipment item was previously evaluated in Reference 59. See page 1A Equipment Item description.

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A Division of The Franklin Institute 20th and Race Streets. Phila. Fa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 45

LICENSEE RESPONSE TO NRC SER

Item 4.6.5 and 4.6.6 address pressurizer pressure and pressurizer level transmitters located inside containment. As noted previously, RG&E has committed to replace and elevate these instruments by June 30, 1982. Emergency procedures at Ginna specify the operator is not to terminate 51 flow unless all of the following are in evidence: Safety Injection flow is zero, pressurizer pressure is increasing and greater than 2000 psig, pressurizer level is greater than 50%, RCS subcooling is greater than 50°F, and steam generator water level narrow range is greater than 25% in one generator. RG&E considers this to be a very conservative set of SI termination criteria. Franklin Research Center A Division of The Franklin Institute 20th and Sace Streets. Phila. Pa. 19103 (215) 448-1000

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 46

Equipment Item No. 46 Pressure Transmitters Located in Intermediate Building (Area #3) Foxboro Model 611 GM-DSJ Steam Life Pressure (PT-468, 469, 478, 479, 482, 483) Licensee References 637 and 639 Required Operating Time: Short term TER Checksheet No. 46 Reference 59, Section 4.3.1.1 Licensee Submittal: Page 5 [62]; Table 3, Page 8 [1]; FRC SCEW 48

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend) R, T, QT, RT, P, H, CS, (A,) S, ((R)), M, I, QM, RPN, EXN, SEN, QI, RPS, None, Not stated, Not applicable LISTING OF APPLICABLE CHECKSHEETS: Checksheet Page No. Suntents Equipment Item la Summary of Licensee Responses to the NRC SER 10 Equipment Environmental Qualification Summary Forms 2 Licensee Response to NRC SER 3a, 36, 38, 38 独, 城, 关, 施, 施, System Consideration Review 致, 我, 关, 关, 我, 天, Equipment Environmental Qualification Review 58, 54, 54, 32 Installed TMI Lessons Learned Implementation 63, 05 Equipment Summary 24, 76, 70 Maintenance and Replacement Schedule Summary
| A Division of The Franklin Institute 20th and Race Streets. Phila Pa. 19103 (215) 448-1000 | NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454 | Page ib |
|--|--|-----------------|
| EQUIPMENT ENVIRONMENTAL QUALIFIC | CATION REVIEW OF EQUIPMENT ITE | M NO. <u>46</u> |
| | | |
| SUMMARY OF LICENSEE RESPONSES TO THE | NRC SER - ONLY CHECKED ITEMS ARE A | PPLICABLE |
| X The Licensee (has/has nut) provid | led a response to the SER concerns. | |
| The Licensee (has/has not) specif qualified and/or will function wh environmental service conditions. | ically stated that the equipment i en exposed to the applicable DBE | ŝ |
| The Licensee has presented inform outstanding qualification deficie | ation which shows there are no ncies. | |
| <u>X</u> The Licensee (has/has not) propos item whose qualification has not | ed a corrective action for this equipment for this equipment for the stablished. | uipment |
| Justification for interim ope Licensee for this equipment i | eration (has/has not) been provided tem. | by the |
| X_ Corrective action specified b | by the Licensee: | |
| X Equipment replacement with Equipment modification Equipment relocation above Relocate or shield equipm Verify qualification by a Equipment relocation to a Qualification testing of Other (| th qualified equipment we submergence level ment from radiation source additional (testing/analysis) a mild environment equipment in progress | , |
| The Licensee has provided oth that can be construed as a ba operation. | er information for this equipment asis for justification for interim | item |
| X The Licensee (has/ the former provided in the corrective action. (Schedule action June 30, 1982) | ovided a schedule for the proposed for accomplishing the corrective |) |
| The Licensee states that the equi and/or should be exempted from er | ipment item does not require qualif nvironmental qualification. | ication |
| DESIGNATION OF RESULTANT NRC QUALIFIC - CIRCLED ITEM ONLY: (See Section 3 | CATION EVALUATION CATEGORY BASED ON of this TER for Legend) | REVIEW |
| I.a Qualified | II.c Qualified Life Deficiency | |
| II a Qualification Not Established | III.b Not in Scope | |

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DESIGNATION: X = DEFICIENCY

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 46

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

NRC REQUIREMENTS

Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

NRC QUALIFICATION CATEGORY

100

DESIGNATION: X = CATEGORY

| I.a | Equipment Qualified | - |
|-------|--|-----|
| I.b | Equipment Qualification Pending Modification | _X_ |
| II.a | Equipment Qualification Not Established | |
| II.b | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life | |
| | or Replacement Schedule Justified | |
| III.a | Equipment Exempt From Qualification | |
| III.b | Equipment Not in the Scope of the Qualification Review | |
| IV | Documentation Not Made Available | |

This equipment item was previously evaluated in Reference 59. See page 1A Equipment Item description.

A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 46

LICENSEE RESPONSE TO NRC SER

In Section 4.3.1, equipment is judged to meet all applicable requirements of the DOR Guidelines except gualified life. As noted earlier, Reference 72 provides information about RG&E's surveillance/ maintenance program to meet Section 7.0 of the DOR Guidelines. Specific equipment items are ad-

 a) 4.3.1.1 - Steam Line Pressure Transmitters - these are to be replaced by June 30, 1982. Franklin Research Center A Division of The Franklin Institute 20th and Race Streets, Phila, Pa . . .03 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 454 FRC Task No.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 47

Equipment Item No. 47 Level Transmitters Located Inside Containment (Area #1) Foxboro Model 613 M-MDL, Modified Monitors Pressurizer Level (LT-426, 427, 428, and 433) Licensee reference not cited Required Operating Time: Not specified TER Checksheet No. 47 Reference 59, Section 4.6.6 Licensee Submittal: Page 12 [62]; Table 3, Page 8 [1]; FRC SCEW 49

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

(R,) T, QT, RT, P, H. (CS, A, S, (R), M, I, (M,) RPN, EXN, SEN, QI, RPS, None,

Not stated, Not applicable

LISTING OF APPLICABLE CHECKSHEETS:

| Contents | Chec | kshe | eet l | Page | No. | |
|---|------------|-------------|-------|-----------|-----|----|
| Equipment Item | la | | | | | |
| Summary of Licensee Responses to the NRC SER | lb | | | | | |
| Equipment Environmental Qualification Summary Forms | 2 | | | | | |
| Licensee Response to NRC SER | 3a, | ж, | ж, | 34 | | |
| System Consideration Review | 4á, | ¥6, | ×, | ۶ą, | Ke, | 純 |
| Equipment Environmental Qualification Review | 96, 59, | 96. 36. | ×, | 79. 71 | ₩, | ×, |
| Installed TMI Lessons Learned Implementation Equipment Summary | 6æ, | <i>9</i> 12 | | | | |
| Maintenance and Replacement Schedule Summary | 20. | 76, | 76 | | | |

| A Division of The Franklin Institute 20th and Race Streets. Phila . Pa 19103 (215) 448-1000 | NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u> | Page Ib |
|---|---|---------------|
| EQUIPMENT ENVIRONMENTAL QUALIFIC | CATION REVIEW OF EQUIPMENT ITEM | NO. <u>47</u> |
| | | |
| SUMMARY OF LICENSEE RESPONSES TO THE | NRC SER - ONLY CHECKED ITEMS ARE APP | LICABLE: |
| X The Licensee (has/has not) provid | ded a response to the SER concerns. | |
| The Licensee (has/has not) specific qualified and/or will function when vironmental service conditions. | fically stated that the equipment is nen exposed to the applicable DBE | |
| The Licensee has presented inform outstanding qualification deficie | mation which shows there are no encies. | |
| X The Licensee (has/hzs not) propos item whose qualification has not | sed a corrective action for this equi been fully established. | pment |
| X Justification for interim ope Licensee for this equipment i | eration (has/ has not) been provided b item. | y the |
| X Corrective action specified b | by the Licensee: | |
| Equipment replacement with Equipment modification X Equipment relocation above | th qualified equipment | |
| Relocate or shield equipm | ment from radiation source | |
| Verify qualification by a Equipment relocation to a | additional (testing/analysis) | |
| Qualification testing of | equipment in progress | |
| Other (| |) |
| The Licensee has provided oth that can be construed as a ba operation. | ner information for this equipment it asis for justification for interim | em |
| X The Licensee (has/tas not) pr corrective action. (Schedule action June30, 1982 | rovided a schedule for the proposed a for accomplishing the corrective |) |
| The Licensee states that the equi and/or should be exempted from en | ipment item does not require qualific nvironmental qualification. | ation |
| DESIGNATION OF RESULTANT NRC QUALIFIC - CIRCLED ITEM ONLY: (See Section 3 | CATION EVALUATION CATEGORY BASED ON R of this TER for Legend) | EVIEW |
| I.a Qualified | II.c Qualified Life Deficiency | |
| (.) Modification | III.a Exempt | |
| II.a Qualification Not Established II.b Not Qualified | IV Documentation Not Available | |
| | | |
| | | |

Franklin Research Center A Division of The Franklin Institute 20th and Race Streets, Phila., Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 47

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

DESIGNATION: X = DEFICIENCY NRC REQUIREMENTS Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

NRC QUALIFICATION CATEGORY

DESIGNATION: X = CATEGORY

| I.a | Equipment Qualified | |
|-------|---|--------------|
| I.b | Equipment Qualification Pending Modification | _ <u>X</u> _ |
| II.a | Equipment Qualification Not Established | |
| II.b | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life or Replacement Schedule Justified | |
| III.a | Equipment Exempt From Qualification | |
| III.b | Equipment Not in the Scope of the Qualification Review | |
| IV | Documentation Not Made Available | |
| | | |

This equipment item was previously evaluated in Reference 59. See page 1A Equipment Item description.

Page 2 A Division of The Franklin Institute 20th and Race Streets, Phila., Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 47

LICENSEE RESPONSE TO NRC SER

Item 4.6.5 and 4.6.6 address pressurizer pressure and pressurizer level transmitters located inside containment. As noted previously, RG&E has committed to replace and elevate these instruments by June 30, 1982. Emergency procedures at Ginna specify the operator is not to terminate SI flow unless all of the following are in evidence: Safety Injection flow is zero, pressurizer pressure is increasing and greater than 2000 psig, pressurizer level is greater than 50%, RCS subcooling is greater than 50°F, and steam generator water level narrow range is greater than 25% in one generator. RG&E considers this to be a very conservative set of SI termination criteria. Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila. Pa 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 48

Equipment Item No. 48 Level Transmitters Located in Auxiliary Building (Area #2) Foxboro Model 613 DM-MSI BAST Level (LT-102, 106, 171, 172) Licensee reference not cited Required Operating Time: Short term TER Checksheet No. 48 Reference 59, Section 4.3.1.2 Licensee Submittal: Page 5 [62]; Table 3, Page 8 [1]; FRC SCEW 50

(See Section 3 of this TER for Legend) R, T, QT, RT, P, H, CS, (A,) S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None, Not stated, Not applicable LISTING OF APPLICABLE CHECKSHEETS: Checksheet Page No. Contents la Equipment Item Summary of Licensee Responses to the NRC SER lb Equipment Environmental Qualification Summary Forms 2 3a, 38, 36, 34 Licensee Response to NRC SER 始, 张, 秋, 风, 关, 死 System Consideration Review 36, 35, 36, 36, 36, 36, 36, Equipment Environmental Qualification Review 51, 50, 54, 15 0, M Installed TMI Lessons Learned Implementation Equipment Summary 71, 76, 70 Maintenance and Replacement Schedule Summary

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY:

Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 48

| The Licensee (has/has not) provide | d a response to the SER concerns. |
|--|--|
| The Licensee (has/hrs-not) specific qualified and/or will function whe environmental service conditions. | cally stated that the equipment is n exposed to the applicable DBE |
| C The Licensee has presented informa outstanding qualification deficient | tion which shows there are no cies. |
| The Licensee (has/has not) propose item whose qualification has not b | d a corrective action for this equipment een fully established. |
| Justification for interim oper Licensee for this equipment it | ation (has/has not) been provided by the em. |
| Corrective action specified by | the Licensee: |
| Equipment replacement with Equipment modification Equipment relocation above Relocate or shield equipme Verify qualification by ad Equipment relocation to a Qualification testing of e Other (| <pre>qualified equipment submergence level nt from radiation source ditional (testing/analysis) mild environment quipment in progress)</pre> |
| The Licensee has provided othe that can be construed as a bas operation. | r information for this equipment item is for justification for interim |
| The Licensee (has/has not) pro corrective action. (Schedule action | vided a schedule for the proposed for accomplishing the corrective .) |
| The Licensee states that the equip and/or should be exempted from env | oment item does not require qualification vironmental qualification. |
| ESIGNATION OF RESULTANT NRC QUALIFICA CIRCLED ITEM ONLY: (See Section 3 of | TION EVALUATION CATEGORY BASED ON REVIEW of this TER for Legend) |
| .a Qualified .b Modification | Qualified Life Deficiency III.a Exempt |
| 1.a Qualification Not Established | TIT.D NOT TH Scope |

Franklin Research Center A Division of The Franklin Institute 20th and Race Streets, Phila., Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 454 FRC Task No.

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 48

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

DESIGNATION: X = DEFICIENCY NRC REQUIREMENTS Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

DESIGNATION:

NRC QUALIFICATION CATEGORY

X = CATEGORY

| I.a | Equipment Qualified | |
|-------|--|-----|
| I.b | Equipment Qualification Pending Modification | |
| II.a | Equipment Qualification Not Established | |
| II.b | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life | |
| | or Replacement Schedule Justified | _X_ |
| III.a | Equipment Exempt From Qualification | |
| III.b | Equipment Not in the Scope of the Qualification Review | |
| IV | Documentation Not Made Available | |
| | | |

This equipment item was previously evaluated in Reference 59. See page 1A Equipment Item description.

Franklin Research Center A Division of The Franklin Institute 20th and Race Streets, Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 48

LICENSEE RESPONSE TO NRC SER

In Section 4.3.1, equipment is judged to meet all applicable requirements of the DOR Guidelines except qualified life. As noted earlier, Reference 72 provides information about RG&E's surveillance/ maintenance program to meet Section 7.0 of the DOR Guidelines. Specific equipment items are addressed below:

b) 4.3.1.2 - BAST Level Transmitters - see reference 72 for "aging" program.

Maintenance/Surveillance Program to Detect Failures (Including Age-Related) of Electrical Equipment

A form similar to the attached form is to be used to evaluate causes of failure of all safety-related electrical equipment, both in a "harsh" and in a "mild" environment. This form has not yet been formally approved for Ginna. Implementation wil be effected by September 30, 1981. All failures during operation, testing, or calibration will be evaluated for failure mechanism. If aging of a component or material type is noted to be a potential concern, an evaluation of other components using this component or material will also be made.

This form is an update of the Ginna administrative measures described in Reference 2.47 to detect aging effects in Ginna elecurical components. Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 Page

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 49

Equipment Item No. 49 Level Transmitters Located Inside Containment (Area #1) Foxboro Model 613 HM-HSI Steam Generator Level (LT-470, 471, 472, 473, 460, 461, 462, 463) Licensee reference not cited Required Operating Time: Not specified TER Checksheet No. 49 Reference 59, Section 4.6.11 Licensee Submittal: Page 13 [62]; Table 3, Page 8 [1]; FRC SCEW 51

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend) R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None, Not stated, Not applicable LISTING OF APPLICABLE CHECKSHEETS: Checksheet Page No. Contents Equipment Item la Summary of Licensee Responses to the NRC SER 1b Equipment Environmental Qualification Summary Forms 2 3a, 36, 36, 36 Licensee Response to NRC SER 346, 346, 4c, 4d, 46, 45 System Consideration Review 法, 法, 关, 风, 光, 光, Equipment Environmental Qualification Review 39, 36, 54, 54 Installed TMI Lessons Learned Implementation 61, 50 Equipment Summary 78, 76, 20 Maintenance and Replacement Schedule Summary

| A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 | NRC Contract N FRC Project No FRC Assignme FRC Task No. | No. NRC-03-79-118 D. C5257 nt No. 13 <u>454</u> | Pag I b |
|---|--|--|----------------|
| QUIPMENT ENVIRONMENTAL QUALIFIC | ATION REVIEW | OF EQUIPMENT ITE | M NO. <u>4</u> |
| SUMMARY OF LICENSEE RESPONSES TO THE | NRC SER - ONLY | CHECKED ITEMS ARE A | APPLICABL |
| X The Licensee (has/bas not) provid | ed a response | to the SER concerns. | |
| The Licensee (has/has not) specifing qualified and/or will function whe environmental service conditions. | ically stated en exposed to | that the equipment is the applicable DBE | is |
| The Licensee has presented inform outstanding qualification deficie | ation which sh ncies. | ows there are no | |
| X The Licensee (has/has not) propos item whose qualification has not | ed a correctiv been fully est | e action for this ec ablished. | quipment |
| Justification for interim ope Licensee for this equipment i | ration (has/ha tem. | s not) been provideo | d by the |
| X Corrective action specified b | y the Licensee | | |
| X Equipment replacement wit | h qualified eq | uipment | |
| Equipment relocation abov | e submergence | level | |
| Relocate or shield equipm | ent from radia | tion source | |
| Verify qualification by a | dditional (tes | ting/analysis) | |
| Oualification testing of | mild environm equipment in p | rogress | |
| Other (| - 1 | |) |
| The Licensee has provided oth that can be construed as a ba operation. | er information sis for justif | for this equipment ication for interim | item |
| X The Licensee (has/has not) pr corrective action. (Schedule action June 30,1982 | ovided a sched for accomplis | ule for the proposed hing the corrective | a) |
| The Licensee states that the equi and/or should be exempted from en | pment item doe vironmental qu | s not require quali alification. | fication |
| DESIGNATION OF RESULTANT NRC QUALIFIC - CIRCLED ITEM ONLY: (See Section 3 | ATION EVALUATI of this TER fo | ON CATEGORY BASED OF Dr Legend) | N REVIEW |
| I.a Qualified | II.c Quali | fied Life Deficienc | У |
| | AAA OL MACHIN | | |
| II.a Qualification Not Established | III.b Not i | n Scope | |

Franklin Research Center A Division of The Franklin Institute 20th and Race Streets, Phila, Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. _ 454

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITFM NO. 49

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

DESIGNATION: X = DEFICIENCY NRC REQUIREMENTS Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

DESIGNATION:

NRC QUALIFICATION CATEGORY

X = CATEGORY

| Equipment Qualified | |
|---|---|
| Equipment Qualification Pending Modification | _X_ |
| Equipment Qualification Not Established | |
| Equipment Not Qualified | |
| Equipment Satisfies All Requirements Except Qualified Life or Replacement Schedule Justified | |
| Equipment Exempt From Qualification | |
| Equipment Not in the Scope of the Qualification Review | |
| Documentation Not Made Available | |
| | Equipment Qualified Equipment Qualification Pending Modification Equipment Qualification Not Established Equipment Not Qualified Equipment Satisfies All Requirements Except Qualified Life or Replacement Schedule Justified Equipment Exempt From Qualification Equipment Not in the Scope of the Qualification Review Documentation Not Made Available |

This equipment item was previously evaluated in Reference 59. See page 1A Equipment Item description.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO 19

LICENSEE RESPONSE TO NRC SER

Item 4.6.11 addresses the steam generator level transmitters. As previously committed, these instruments will be replaced by June 30, 1982.

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Page 4c

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 49

SYSTEM CONSIDERATION REVIEW

EVALUATION OF LICENSEE STATEMENT

This equipment item was previously evaluated in Reference 59.

The evaluation is repoduced below.

EVALUATION:

FRC concurs with RG&E's plan for qualification of these instruments for the long term. FRC does not find technical discrepancies in the Licensee position stated above, even though FRC believes that steam generator operation would be very difficult without operational level instruments. At the same time, however, precautions should be taken to ensure that the possibility of faulty indication causing the operator to take undesirable action, such as stopping auxiliary feedwater (AFW) flow, is minimized.

CONCLUSION:

Until these instruments are replaced with qualified instruments, the Licensee should ensure that emergency procedures are extremely conservative with regard to use of unqualified instruments as the basis for operational decisions, such as securing AFW (e.g., procedure might require two of three level instruments in agreement and responding normally to changes in feed rate). Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 50

Equipment Item No. 50 (TMI Action Plan Item II.F.2) Resistance Temperature Detectors Located Inside Containment (Area #1) Rosemount Model 176JA Reactor Coolant System Temperature (Plant ID Not Stated) Licensee Reference 571 Required Operating Time: Not specified TER Checksheet No. 50 Reference 59, Section 4.6.10 Licensee Submittal: Page 13 [62]; Table 3, Page 9 [1]; FRC SCEW 52

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

(R) (T) (T) HT, (P) H, CS, (A, S, (R), M, I, (M) RPN, EXN, SEN, (I) RPS, None,

Not stated, Not applicable

LISTING OF APPLICABLE CHECKSHEETS:

| Contents | Chec | kshe | eet I | Page | No. | |
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| Equipment Environmental Qualification Summary Forms | 2 | | | | | |
| Licensee Response to NRC SER | 3a, | 36, | 3€, | ेत | | |
| System Consideration Review | 4a, | 4b, | 4c, | 4đ. | 4e, | 4€ |
| Equipment Environmental Qualification Review | 56, 59, | 96, 36, | 56, 51, | 931, 79 | Da, | £₹, |
| Installed TMI Lessons Learned Implementation Equipment Summary | 6a, | 6b | | | | |
| Maintenance and Replacement Schedule Summary | 76., | 26, | Xć. | | | |

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| EQUIPMENT ENVIRONMENTAL QUALIFIC | CATION REVIEW OF EQUIPMENT ITEN | NO. 50 |
| | | |
| SUMMARY OF LICENSEE RESPONSES TO THE | NRC SER - ONLY CHECKED ITEMS ARE AN | PPLICABLE: |
| X The Licensee (has/has not) provid | ed a response to the SER concerns. | |
| The Licensee (has/has not) specif qualified and/or will function wh environmental service conditions. | ically stated that the equipment is en exposed to the applicable DBE | 3 |
| The Licensee has presented inform outstanding qualification deficie | ation which shows there are no ncies. | |
| X The Licensee (has/has-not) propos item whose qualification has not | ed a corrective action for this equippeen fully established. | lipment |
| Justification for interim ope Licensee for this equipment i | ration (has/has not) been provided tem. | by the |
| \underline{X} Corrective action specified b | y the Licensee: | |
| <u>X</u> Equipment replacement wit Equipment modification | h qualified equipment | |
| Equipment relocation abov | e submergence level | |
| Verify gualification by a | dditional (testing/analysis) | |
| Equipment relocation to a | mild environment | |
| Qualification testing of | equipment in progress | |
| X Other (Only replace su | becooling meter RTD's |) |
| The Licensee has provided oth that can be construed as a ba operation. | er information for this equipment i sis for justification for interim | tem |
| X The Licensee (has/has not) pr corrective action. (Schedule actionJune30,1982 | ovided a schedule for the proposed for accomplishing the corrective | .) |
| The Licensee states that the equi and/or should be exempted from en | pment item does not require qualifivironmental qualification. | ication |
| DESIGNATION OF RESULTANT NRC QUALIFIC - CIRCLED ITEM ONLY: (See Section 3 | CATION EVALUATION CATEGORY BASED ON of this TER for Legend) | REVIEW |
| I.a Qualified | II.c Qualified Life Deficiency | |
| (I.a) Qualification Not Established | III.b Not in Scope | |
| II.b Not Qualified | IV Documentation Not Availabl | le |

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 50

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

| D | ES | IGNATION: |
|---|----|------------|
| X | = | DEFICIENCY |

DESIGNATION: X = CATEGORY

Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Envel ped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied

Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied

Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

NRC QUALIFICATION CATEGORY

Equipment Qualified I.a Equipment Qualification Pending Modification I.b Equipment Qualification Not Established II.a II.b Equipment Not Qualified Equipment Satisfies All Requirements Except Qualified Life II.C or Replacement Schedule Justified Equipment Exempt From Qualification III.a Equipment Not in the Scope of the Qualification Review III.D Documentation Not Made Available IV

This equipment item was previously evaluated in Reference 59. See page 1A Equipment Item description.

The licensee has committed to replace the RTD's used in the subcooling monitor with qualified items but not the remaining units. (see pages 40,46,46)

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 50

LICENSEE RESPONSE TO NRC SER

Item 4.6.10 addresses the RTD's. As previously noted, RG&E has committed to replace the RTD's required as input to the subcooling meter, as a "TMI-related" modification. RG&E does not consider the RTD's as necessary for the mitigation of a LOCA. Although FRC refers to E.5 of Appendix E, no discussion is provided there, or anywhere else throughout Appendix E.

RG&E is also aware that the environmental service conditions for the RTD's include both RCS conditions and containment conditions. This will be accounted for in the replacement units. A Division of The Franklin Institute 20th and Race Streets. Phila... Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 50

SYSTEM CONSIDERATION REVIEW

The Licensee has stated that this equipment item does not require environmental qualification and/or should be exempted from qualification. The Licensee's rationale has been evaluated and the reasons for concurrence/ non-concurrence with the technical basis of the Licensee's position are presented below.

Reason for Concurrence

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- Equipment does not provide a safety function or mitigate the consequences of a design basis accident. Equipment Environmental Qualification is not required by the DOR Guidelines. (NRC Qualification Evaluation Category IIIa)
- Equipment is not exposed to a harsh environment by the accident it is intended to mitigate. See note (1) on page 4b. (NRC Qualification Evaluation Category IIIb)
- Backup (equipment/system) is available which completely performs the safety function. The backup (equipment/system) is environmentally qualified and appears to meet single active failure criterion. See note (1) on page 4b. (NRC Qualification Evaluation Category IIIa)

Reason for Non-Concurrence

- Backup (equipment/system) is not fully capable of performing the intended safety function or accident mitigating function.
- Backup (equipment/system) is not environmentally qualified and can be exposed to a hostile environment simultaneously with the primary equipment.
- Backup (equipment/system) is subject to a potentially disabling single active failure.
- Failure of the primary equipment can compromise the ability of other safety-related equipment to perform its specified safety function.
- X Failure of the primary equipment can result in erroneous indication which could mislead an operator.
- failure criterion. See note (1) X Requirement for continued functionon page 4b. (NRC Qualification Evaluation Category IIIa) Requirement for continued functioning throughout the post-accident period necessitates environmental qualification.

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EQUIPMENT ENVIRONMENTAL C ALIFICATION REVIEW OF EQUIPMENT ITEM NO. 50

Reason for Concurrence

- The equipment's accident mitigating function is completed prior to the onset of the hostile environment. No subsequent functions are necessary. See note (1) below. (NRC Qualification Evaluation Category IIIb)
- Other (see page)
- Resultant NRC Qualification Evaluation Category (IIIa/IIIb)
- Note 1: The Licensee (has/ has not) stated that failure of the primary equipment will not affect other safety-related equipment or cause an operator to be misled. (See page____)

Reason for Non-Concurrence

- Although backup equipment is available, it is not technically sound to relinquish defense-in-depth for this function.
- Backup (equipment/system) is not safety-related.
- X This equipment is necessary for the operator to ensure an ESF system is performing its intended safety function.
- The rationale presented by the Licensee is not supported by objective technical evidence.
- ____ Other (see page___)

LICENSEE STATEMENT

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See page 3a of this checksheet.

EVALUATION OF LICENSEE STATEMENT

The Licensee Pesponse, quoted on pg. 4-91 of TER-C5257-178, indicated that reactor coolant system RTD's were not required for LOCAs or MSLBs, with exception of a low Tavg signal which contributed to the shutting of the main steam isolation valves (MSIVs). FRC referred to Item E.5 of Appendix E to TER-C5257-178 because of the discussion in that section of the desirability of shutting the MSIVs as a backup to the nonreturn check valve in the broken line during a MSLB inside containment. FRC considered all of this discussion to be largely moot, however, because of the last two sentences of the Licensee response which stated:

> "However, to avoid the possibility of operator confusion, PGE will initiate a program to provide qualified PTDs for post-accident monitoring. These will be procured and installed by June 1982, subject to equipment availability and procurement/delivery schedules."

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 50

SYSTEM CONSIDERATION REVIEW

EVALUATION OF LICENSEE STATEMENT (Continued)

The Licensee Pesponse to the NRC SER (page 3a of this checksheet), however, indicates that the Licensee did not commit to replacing all of the reactor coolant system RTDs but only to replacing RTDs with an input to the subcooling meter. In view of this statement, it appears that the Licensee still considers the remaining RTDs as not requiring environmental qualification. FRC does not concur that these RTDs are not required for post-accident monitoring.

Reactor coolant system temperature indication is required during the initial phases of a design hasis accident, during a cooldown to cold shutdown conditions, and during subsequent long-term cooling. The hot-leg detectors aid in determining reactor system subcooling and in providing indication of natural circulation. The cold-leg instruments also provide indication of natural circulation, provide input to heat balance calculations, and provide direct indication of ECCS injection. During plant cooldown, these detectors are necessary to ensure that cooldown rates are not being exceeded. They are also necessary to ensure that the long-term cooling method is functioning properly.

In view of the above discussion, it is concluded that the reactor coolant system RTDs should be fully qualified for their post-accident environment.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 50

INSTALLED TMI LESSONS LEARNED IMPLEMENTATION EQUIPMENT SUMMARY

NRC requested an evaluation of the environmental qualification of safetyrelated electrical equipment located in harsh environments required for TMI Lessons Learned Implementation. The objective is to evaluate qualification documentation of equipment within the scope of IE Bulletin 79-01B, Supplement 3 (item 2), in accordance with criteria established by the NRC (see Section 2 of this report) in a manner identical to the evaluation of all other safetyrelated electrical equipment. The scope of this review is limited to TMI Action Plan equipment associated with specific Sections of NUREG-0737 which have an installation implementation date of January 1, 1981 (sections are identified below). Where applicable, a review is to be performed on installed equipment with implementation dates after January 1, 1981 if adequately identified by the licensee.

This plant is a PWR X, BWR The NSSS Vendor is Westinghouse (W) X, Babcox & Wilcox (B&W) , Combustion Engineering (CE) , General Electric (GE) .

With respect to this equipment item, it is noted (applicable section checked):

- The Licensee does not provide adequate information with respect to identification of TMI Action Plan equipment installed as of 1/1/81.
- _____ The Licensee has not provided the correlation of this equipment item with the specific sections of NUREG-0737. [The correlation is needed to ensure that all items are included in the review, e.g., if a transmitter is identified as a TMI Action Plan item, are the cable and the terminal blocks associated with the device also identified?]
- ____ The Licensee has not provided the approximate installation date for the TMI Action Plan equipment items so that the appropriate qualification criteria (NUREG-0588 or DOR Guidelines) can be used in the EEQ evaluation.
- ____ The Licensee has provided a standard Owners' Group position with respect to a NUREG-0737 technical area.

The Licensee has requested extensions of implementation dates.

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X The Licensee has stated that this equipment item is associated with the following section of NUREG-0737. (This list of applicable NUREG-0737 sections has been identified by NPC as sections within the scope of this review):

____ II.B.3 (ALL/1-1-81) Post-Accident Sampling Capability of Reactor Coolant and Containment

____ II.D.3 (ALL/1-1-81) Direct Indication of Relief and Safety Valve Position Franklin Research Center A Division of The Franklin Institute 20th and Race Streets, Phila, Pa 19103 (215) 448-1000

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 50

- ____ II.E.1.2 (PWR/1-1-81) Auxiliary Feedwater System Automatic Initiation and Flow Indication
- ____ II.E.3.1 (PWR/1-1-81) Emergency Power Supply for Pressurizer Heaters (Safety-Grade Interfaces
- II.E.4.1 (ALL/7-1-81) Dedicated Hydrogen Penetrations
- II.E.4.2 (ALL/1-1-81) Containment Isolation Dependability
- X II.F.2 (PWR/1-1-81) Instrumentation for Detection of Inadequate Core Cooling
- ____ II.G.1 (PWR/1-1-81) Emergency Power for Pressurizer Equipment (Safety-Grade Interfaces)
- II.K.2.10 (PWR/B&W/7-1-81) Safety-Grade Anticipatory Reactor Trip
- ____ II.K.3.9 (PWR/W/1-1-81) PID Controller Modification (If Hardware Change Involved)
- II.K.3.12 (PWR/W/1-1-81) Anticipatory Reactor Trip upon Turbine Trip
- _____ II.K.3.13 (BWR/GE/7-1-81) Separation of HPCI / RCIC Initiation Signals
- ____ II.K.3.15 (BWR/GE/7-1-81) Prevention of Spurious Isolation of HPCI and RCIC Systems
- II.K.3.19 (BWR/GE/7-1-81) Interlock on Recirculation Pump Loop

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- ____ II.K.3.21 (BWR/GE/7-1-81) Restart of Core Spray and LPCI Systems (If Hardware Changed Out)
- ____ II.K.3.27 (BWR/GE/7-1-81) Provide Common Reference Level for Vessel Level Instrumentation (If Hardware Changed Out)

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 51

Equipment Item No. 51
Battery Banks Located in Battery Rooms on Basement Level of Control
Building (Area #8)
Gould Industrial Battery Division, Model FTA-19
Provide DC Power Supply (Plant ID Not Stated)
Licensee Reference 22
Required Operating Time: Long term
TER Checksheet No. 51
Reference 59, Section 4.7.9
Licensee Submittal: Table 3, Page 9 [1]; FRC SCEW 53

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend) R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None, Not stated, Not applicable) LISTING OF APPLICABLE CHECKSHEETS: Checksheet Page No. Contents la Equipment Item Summary of Licensee Responses to the NRC SER 1b Equipment Environmental Qualification Summary Forms 2 36, 36, 36, 38 Licensee Response to NRC SER 46, 36, 30, 36, 36, 36, 36 System Consideration Review 54, 56, 56, 54, 56, 54, Equipment Environmental Qualification Review 34, 34, 34, 54 Installed TMI Lessons Learned Implementation 64, 66 Equipment Summary 76, 70, 70 Maintenance and Replacement Schedule Summary

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 51

SUMMARY OF LICENSEE RESPONSES TO THE NRC SER - ONLY CHECKED ITEMS ARE APPLICABLE: The Licensee (has/has not) provided a response to the SER concerns. The Licensee (has/has not) specifically stated that the equipment is qualified and/or will function when exposed to the applicable DBE environmental service conditions. The Licensee has presented information which shows there are no outstanding qualification deficiencies. The Licensee (has/has not) proposed a corrective action for this equipment item whose qualification has not been fully established. Justification for interim operation (has/has not) been provided by the Licensee for this equipment item. Corrective action specified by the Licensee: Equipment replacement with qualified equipment Equipment modification Equipment relocation above submergence level Relocate or shield equipment from radiation source Verify qualification by additional (testing/analysis) Equipment relocation to a mild environment Qualification testing of equipment in progress Other (The Licensee has provided other information for this equipment item that can be construed as a basis for justification for interim operation. The Licensee (has/has not) provided a schedule for the proposed corrective action. (Schedule for accomplishing the corrective action ...) The Licensee states that the equipment item does not require qualification and/or should be exempted from environmental qualification. DESIGNATION OF RESULTANT NRC QUALIFICATION EVALUATION CATEGORY BASED ON REVIEW - CIRCLED ITEM ONLY: (See Section 3 of this TER for Legend) I.a Qualified II.c Qualified Life Deficiency III.a Exempt I.b Modification I .a Qualification Not Established (III.b) Not in Scope Documentation Not Available II.b Not Qualified IV

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 51

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

DESIGNATION: X = DEFICIENCY NRC REQUIREMENTS Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied Criteria Regi ding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

NRC QUALIFICATION CATEGORY

DESIGNATION:

X = CATEGORY

| I.a | Equipment Qualified | |
|-------|--|-----|
| I.b | Equipment Qualification Pending Modification | |
| II.a | Equipment Qualification Not Established | |
| II.b | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life | |
| | or Replacement Schedule Justified | |
| III.a | Equipment Exempt From Qualification | |
| III.D | Equipment Not in the Scope of the Qualification Review | _X_ |
| IV | Documentation Not Made Available | |

MILD ENVIRONMENT

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 52

Equipment Item No. 52 Diesel Generator Electrical Equipment Located in D/G Annex (Area #4) ALCO Diesel Engine, Model 251F and Controls Power Supply to Safeguards Buses (Plant ID Not Stated) Licensee reference not cited Required Operating Time: Long term TER Checksheet No. 52 Reference 59, Section 4.7.10 Licensee Submittal: Table 3, Page 9 [1]; FRC SCEW 54

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

Not stated, Not applicable

LISTING OF APPLICABLE CHECKSHEETS:

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| System Consideration Review | 4á, | 46, | 秩, | 4¢, | ×, | × |
| Equipment Environmental Qualification Review | ¥a, 59. | %, %, | %, %, | ×a, ×i | ж , | ×, |
| Installed TMI Lessons Learned Implementation Equipment Summary | ĝa, | 94 | | | | |
| Maintenance and Replacement Schedule Summary | 74, | 70. | 74 | | | |

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| FRC | Project No. C52 | 57 |
| FRC | Assignment No | . 13 , |
| FRC | ask No | 454 |

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 52

SUMMARY OF LICENSEE RESPONSES TO THE NRC SER - ONLY CHECKED ITEMS ARE APPLICABLE: The Licensee (has/has not) provided a response to the SER concerns. The Licensee (has/has not) specifically stated that the equipment is gualified and/or will function when exposed to the applicable DBE environmental service conditions. The Licensee has presented information which shows there are no outstanding qualification deficiencies. The Licensee (has/has not) proposed a corrective action for this equipment item whose qualification has not been fully established. Justification for interim operation (has/has not) been provided by the Licensee for this equipment item. Corrective action specified by the Licensee: Equipment replacement with qualified equipment Equipment modification Equipment relocation above submergence level Relocate or shield equipment from radiation source Verify qualification by additional (testing/analysis) Equipment relocation to a mild environment Qualification testing of equipment in progress Other (The Licensee has provided other information for this equipment item that can be construed as a basis for justification for interim operation. The Licensee (has/has not) provided a schedule for the proposed corrective action. (Schedule for accomplishing the corrective action .) The Licensee states that the equipment item does not require qualification and/or should be exempted from environmental gualification. DESIGNATION OF RESULTANT NRC QUALIFICATION EVALUATION CATEGORY BASED ON REVIEW - CIRCLED ITEM ONLY: (See Section 3 of this TER for Legend) I.a Qualified II.c Qualified Life Deficiency I.b Modification III.a Exempt II.a Qualification Not Established (III.b) Not in Scope IV Documentation Not Available II.b Not Qualified

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 52

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

NRC REQUIREMENTS

DESIGNATION: X = DEFICIENCY

> DESIGNATION: X = CATEGORY

| Documented Evidence of Qualification Adequate |
|---|
| Adequate Similarity Between Equipment and Test Specimen Established |
| Aging Degradation Evaluated Adequately |
| Qualified Life or Replacement Schedule Established (If Required) |
| Program Established to Identify Aging Degradation |
| Criteria Regarding Aging Simulation Satisfied (If Required) |
| Criteria Regarding Temperature/Pressure Exposure: |
| o Peak Temperature Adequate |
| o Peak Pressure Adequate |
| o Duration Adequate |
| o Required Frofile Enveloped Adequately |
| o Steam Exposure (If Required) Adequate |
| Criteria Regarding Spray Satisfied |
| Criteria Regarding Submergence Satisfied |
| Criteria Regarding Radiation Satisfied |
| Criteria Regarding Test Sequence Satisfied |
| Criteria Regarding Test Failures or Severe Anomalies |
| (If Any) Satisfied |
| Criteria Regarding Functional Testing Satisfied |
| Criteria Regarding Instrument Accuracy Satisfied |
| Test Duration Margin (1 hour + Function Time) Satisfied |
| Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I) |
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NRC QUALIFICATION CATEGORY

| T | Pruirmont Ouslified | |
|-------|--|-----|
| 1.4 | Eduthmenc Anartited | |
| I.b | Equipment Qualification Pending Modification | |
| II.a | Equipment Qualification Not Established | |
| II.D | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life | |
| | or Replacement Schedule Justified | |
| III.a | Equipment Exempt From Qualification | |
| III.D | Equipment Not in the Scope of the Qualification Review | _X_ |
| IV | Documentation Not Made Available | |

MILD ENVIRONMENT

Franklin Research Center A Division of The Franklin Institute 20th and Race Streets, Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 53

Equipment Item No. 53 Diesel Generator Electrical Equipment Located in D/G Annex (Area #4) Westinghouse 1900 kW Generator and Controls Power Supply to Scheguards Buses (Plant ID Not Stated) Licensee reference not cited Required Operating Time: Long term TER Checksheet No. 53 Reference 59, Section 4.7.10 Licensee Submittal: Table 3, Page 9 [1]; FRC SCEW 55

(See Section 3 of this TER for Legend) R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None, Not stated, Not applicable) LISTING OF APPLICABLE CHECKSHEETS: Checksheet Page No. Contents la. Equipment Item Summary of Licensee Responses to the NRC SER 1b Equipment Environmental Qualification Summary Forms 2 Licensee Response to NRC SER 36, 36, 36, 38 4a, 4x, 4c, 4d, 3e, 4t System Consideration Review 34, 36, 36, 36, 36, 36, 36, Equipment Environmental Qualification Review 39, 36, 34, 35 Installed TMI Lessons Learned Implementation 6A, 06 Equipment Summary 75, 76, 26 Maintenance and Replacement Schedule Summary

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY:

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|------|---|---|
| 5000 | Franklin Research Center | |
| | A Division of The Franklin Institute | |
| | 20th and Race Streets. Phila . Pa 19103 (215) 448-100 |) |

NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 53

SUMMARY OF LICENSEE RESPONSES TO THE NRC SER - ONLY CHECKED ITEMS ARE APPLICABLE:

- The Licensee (has/has not) provided a response to the SER concerns.
- ____ The Licensee (has/has not) specifically stated that the equipment is qualified and/or will function when exposed to the applicable DBE environmental service conditions.
- The Licensee has presented information which shows there are no outstanding qualification deficiencies.
- The Licensee (has/has not) proposed a corrective action for this equipment item whose qualification has not been fully established.
 - _____ Justification for interim operation (has/has not) been provided by the Licensee for this equipment item.
 - Corrective action specified by the Licensee:
 - Equipment replacement with qualified equipment
 - Equipment modification
 - Equipment relocation above submergence level
 - ____ Relocate or shield equipment from radiation source
 - Verify qualification by additional (testing/analysis)
 - Equipment relocation to a mild environment
 - Qualification testing of equipment in progress
 - Other (
 - The Licensee has provided other information for this equipment item that can be construed as a basis for justification for interim operation.
 - The Licensee (has/has not) provided a schedule for the proposed corrective action. (Schedule for accomplishing the corrective action .)
- The Licensee states that the equipment item does not require qualification and/or should be exempted from environmental qualification.

DESIGNATION OF RESULTANT NRC QUALIFICATION EVALUATION CATEGORY BASED ON REVIEW - CIRCLED ITEM ONLY: (See Section 3 of this TER for Legend)

I.a Qualified I.b Modification II.a Qualification Not Established II.b Not Qualified II.c Qualified Life Deficiency III.a Exempt (II.b) Not in Scope IV Documentation Not Available Franklin Research Center A Division of The Franklin Institute

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NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 5.3

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

DESIGNATION: X = DEFICIENCY

NRC REQUIREMENTS

| Decurrented Ruidence of Qualification Adequate | |
|---|-----------------------------------|
| Documented Evidence of Qualification Adequate | |
| Adequate Similarity Between Equipment and rest Specimen Bacabitshou | and an end of the second section. |
| Aging Degradation Evaluated Adequately | |
| Qualified Life or Replacement Schedule Established (If Required) | |
| Program Established to Identify Aging Degradation | |
| Criteria Regarding Aging Simulation Satisfied (If Required) | |
| Criteria Regarding Temperature/Pressure Exposure: | |
| o Peak Temperature Adequate | |
| o Peak Pressure Adequate | - |
| o Duration Adequate | |
| o Required Profile Enveloped Adequately | |
| o Steam Exposure (If Required) Adequate | |
| Criteria Regarding Spray Satisfied | |
| Criteria Regarding Submergence Satisfied | |
| Criteria Regarding Radiation Satisfied | |
| Criteria Regarding Test Sequence Satisfied | |
| Criteria Regarding Test Failures or Severe Anomalies | |
| (If Any) Satisfied | |
| Criteria Regarding Functional Testing Satisfied | |
| Criteria Regarding Instrument Accuracy Satisfied | |
| Test Duration Margin (1 hour + Function Time) Satisfied | |

Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

DESIGNATION:

X = CATEGORY

| I.a | Equipment Qualified | |
|-------|--|-----|
| I.b | Equipment Qualification Pending Modification | |
| II.a | Equipment Qualification Not Established | |
| II.b | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life | |
| | or Replacement Schedule Justified | |
| III.a | Equipment Exempt From Qualification | |
| III.D | Equipment Not in the Scope of the Qualification Review | _X_ |
| IV | Documentation Not Made Available | |

MILD ENVIRONMENT

NRC QUALIFICATION CATEGORY



| NRC Contract No. NRC | 2-03-79-118 |
|-----------------------|-------------|
| FRC Project No. C5257 | |
| FRC Assignment No. 1 | 3 / |
| FRC Task No. 45 | 54 |

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 54

Equipment Item No. 54 Diesel Generator Electrical Equipment Located in D/G Annex (Area #4) Westinghouse Model 1 hp TEFC AC Motor Drives Fuel Oil Transfer Pump (Plant ID Not Stated) Licensee refere. 7e not cited Required Operating Time: Long term TER Checksheet No. 54 Reference 59, Section 4.7.10 Licensee Submittal: Table 3, Page 9 [1]; FRC SCEW 56

| DESIG | NATION | FOI | R DE | EFICIE | ENCY | IDEN | TIFIED | BY | THE | NRC | SER | - | CIRCLED | ITEM(S) | ONLY: |
|-------|---------|-----|------|--------|------|------|---------|----|-----|-----|-----|---|---------|---------|-------|
| (See | Section | 13 | of | this | TER | for | Legend) | | | | | | | | |

R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

Not stated, (Not applicable)

LISTING OF APPLICABLE CHECKSHEETS:

| Contents | Chec | <u>ckshe</u> | et l | Page | No. | |
|--|------------|--------------|-----------|-----------|-----------------|-------------|
| Equipment Item | la | | | | | |
| Summary of Licensee Responses to the NRC SER | 16 | | | | | |
| Equipment Environmental Qualification Summary Forms | 2 | | | | | |
| Licensee Response to NRC SER | 36, | 弹, | ж, | 36 | | |
| System Consideration Review | 44, | 纯, | ¥c, | 44, | 殃, | × |
| Equipment Environmental Qualification Review | 5e, 99, | ** | %°, ¾, | ≫6, ≫3 | ب و, | ب ور |
| Installed TMI Lessons Learned Implementation Equipment Summary | 63. | X | | | | |
| Maintenance and Penlacement Schedule Summary | 74. | 26. | 26 | | | |

| A Division of The Franklin Institute 20th and Race Streets. Philo. Pa. 19103 (215) 448-1000 | NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No | Page Ib |
|---|---|------------|
| EQUIPMENT ENVIRONMENTAL QUALIFIC | CATION REVIEW OF EQUIPMENT ITEM | NO. 54 |
| | | |
| SUMMARY OF LICENSEE RESPONSES TO THE | NRC SER - ONLY CHECKED TIEMS ARE AP | PLICABLE |
| The Licensee (has/has not) provid | ed a response to the SER concerns. | |
| The Licensee (has/has not) specif qualified and/or will function wh environmental service conditions. | ically stated that the equipment is en exposed to the applicable DBE | |
| The Licensee has presented inform outstanding qualification deficie | ation which shows there are no encies. | |
| The Licensee (has/has not) propos item whose qualification has not | ed a corrective action for this equ been fully established. | ipment |
| Justification for interim ope Licensee for this equipment i | ration (has/has not) been provided tem. | by the |
| Corrective action specified b | by the Licensee: | |
| Equipment replacement wit Equipment modification | h qualified equipment | |
| Equipment relocation abov | e submergence level | |
| Relocate or shield equipm | ent from radiation source | |
| Equipment relocation to a | mild environment | |
| Qualification testing of Other (| equipment in progress |) |
| The Licensee has provided oth that can be construed as a ba operation. | er information for this equipment in sis for justification for interim | tem |
| The Licensee (has/has not) pr corrective action. (Schedule action | ovided a schedule for the proposed for accomplishing the corrective | .) |
| The Licensee states that the equi and/or should be exempted from en | pment item does not require qualification. | cation |
| DESIGNATION OF RESULTANT NRC QUALIFIC - CIRCLED ITEM ONLY: (See Section 3 | CATION EVALUATION CATEGORY BASED ON of this TER for Legend) | REVIEW |
| I.a gualified | II.c Qualified Life Deficiency | |
| I.b Modification | III.a Exempt | |
| II.a Qualification Not Established | III.b) Not in Scope | 0 |
| TT'D HOC ANGTITION | TA INCOMPTICATION NOT WANTIGDT | 6 |
Franklin Research Center A Division of The Franklin Institute 20th and Race Striets, Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. _____45_4

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 54

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

NRC REQUIREMENTS

DESIGNATION: X = DEFICIENCY

Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

NRC QUALIFICATION CATEGORY

DESIGNATION: X = CATEGORY

| I.a | Equipment Qualified | |
|-------|--|-----|
| I.b | Equipment Qualification Pending Modification | |
| II.a | Equipment Qualification Not Established | |
| II.b | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life | |
| | or Replacement Schedule Justified | |
| III.a | Equipment Exempt From Qualification | |
| III.D | Equipment Not in the Scope of the Qualification Review | _X_ |
| IV | Documentation Not Made Available | |

MILD ENVIRONMENT

A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 55

Equipment Item No. 55 Reactor Containment Fan Cooler Motors Located Inside Containment (Area #1) Westinghouse 588.5-CSP Containment Cooling (Plant ID Not Stated) Licensee References 40, 41, 42, 606, 637, 639, and 640 Required Operating Time: Long term TER Checksheet No. 55 Reference 59, Section 4.5.2.4 Licensee Submittal: Page 7 [62]; Table 3, Page 9 [1]; FRC SCEW 57

| DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER . (See Section 3 of this TER for Legend) | - CI | CLEI |) 111 | SM (5) | UNI | <u>. 1</u> . |
|--|------------|--------------|-----------|-----------|------|--------------|
| R, T, QI, RT, P, H, S, A, S, (R), M, I, M, RPN, EXN | , SEN | 4, @ | RI | PS, N | lonë | , |
| Not stated, Not applicable | | | | | | |
| LISTING OF APPLICABLE CHECKSHEETS: | | | | | | |
| Contents | Chee | cksh | eet 1 | Page | No. | |
| Equipment Item | la | | | | | |
| Summary of Licensee Responses to the NRC SER | lb | | | | | |
| Equipment Environmental Qualification Summary Forms | 2 | | | | | |
| Licenses Response to NRC SER | 3a, | 3b, | B | Se | | |
| System Consideration Review | ¥. | 4 К, | ¥6, | 44. | à#., | 42 |
| Equipment Environmental Qualification Review | 5a, 5g, | 5b, 5h, | 5c, ¥, | 5d, 33 | 5e, | 5f, |
| Installed TMI Lessons Learned Implementation Equipment Summary | 64. | 6 1 2 | | | | |
| Maintenance and Replacement Schedule Summary | 7a, | the. | te | | | |

| A Division of The Franklin Institute 20th and Race Streets. Phila Pa. 19103 (215) 448-1000 | NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No | Page 1b |
|---|---|--------------------------------|
| QUIPMENT ENVIRONMENTAL QUALIFIC | CATION REVIEW OF EQUIPMENT ITE | M NO. 59 |
| SUMMARY OF LICENSEE RESPONSES TO THE | NRC SER - ONLY CHECKED ITEMS ARE A | PPLICABLE |
| X The Licensee (has/has not) provid | led a response to the SER concerns. | |
| The Licensee (has/has not) specif qualified and/or will function wh environmental service conditions. | ically stated that the equipment i en exposed to the applicable DBE | S |
| The Licensee has presented inform outstanding qualification deficie | nation which shows there are no encies. | |
| X The Licensee (has/hae not) propos item whose qualification has not | ed a corrective action for this eg been fully established. | luipment |
| Justification for interim ope Licensee for this equipment i | ration (has/has not) been provided tem. | l by the |
| X Corrective action specified b | by the Licensee: | |
| Equipment replacement wit Equipment modification Equipment relocation abov Relocate or shield equipm Verify qualification by a Equipment relocation to a Qualification testing of X Other (will replace cu equivalent to the co The Licensee has provided oth that can be construed as a ba operation. | th qualified equipment we submergence level ment from radiation source additional (testing/analysis) a mild environment equipment in progress <u>errently installed arease w/a Cl</u> originallested westinghouse type mer information for this equipment asis for justification for interim | a <u>euro</u> ri E. item |
| X The Licensee (has/mas not) pr corrective action. (Schedule action <u>Spring</u> 1982 ref | ovided a schedule for the proposed of for accomplishing the corrective weling out age | 1 *) |
| The Licensee states that the equi and/or should be exempted from en | Ipment item does not require qualif nvironmental qualification. | fication |
| DESIGNATION OF RESULTANT NRC QUALIFIC | CATION EVALUATION CATEGORY BASED ON | REVIEW |
| - CIRCLED ITEM ONLY: (See Section 3 | of this TER for Legend) | |
| I.a Qualified | II.c Qualified Life Deficiency | 1 |
| I.D Modification | III.a Exempt | |
| II.b Not Qualified | IV Documentation Not Availab | ble |
| | | |

Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 55

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

| DESIG | GNATION: |
|--|-------------|
| NRC REQUIREMENTS X = DI | EFICIENCY |
| Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established | X |
| Aging Degradation Evaluated Adequately | - <u>×</u> |
| Program Established to Identify Aging Degradation | |
| Criteria Regarding Aging Simulation Satisfied (If Required) | |
| Criteria Regarding Temperature/Pressure Exposure: | |
| o Peak Temperature Adequate | |
| o Peak Pressure Adequate | |
| o Duration Adequate | |
| o Required Profile Enveloped Adequately | |
| o Steam Exposure (If Required) Adequate | |
| Criteria Regarding Spray Satisfied | |
| Criteria Regarding Submergence Satisfied | |
| Criteria Regarding Radiation Satisfied | _ <u>X_</u> |
| Criteria Regarding Test Sequence Satisfied | |
| Criteria Regarding Test Failures or Severe Anomalies | |
| (If Any) Satisfied | |
| Criteria Regarding Functional Testing Satisfied | |
| Criteria Regarding Instrument Accuracy Satisfied | |
| Test Duration Margin (1 hour + Function Time) Satisfied | |
| Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I) | |

DESIGNATION: X = CATEGORY

NRC QUALIFICATION CATEGORY

I.a Equipment Qualified Equipment Qualification Pending Modification I.b <u>×</u> Equipment Qualification Not Established II.a Equipment Not Qualified II.D Equipment Satisfies All Requirements Except Qualified Life II.c or Replacement Schedule Justified III.a Equipment Exempt From Qualification III.b Equipment Not in the Scope of the Qualification Review Documentation Not Made Available IV

See page 5h For Conclusions

This equipment item was previously evaluated in Reference 59. See page 1A Equipment Item description.

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3a

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 55

LICENSEE RESPONSE TO NRC SER

Item 4.5.2.4 addresses the Reactor Containment Fan Coolers Located Within Containment. Several concerns were addressed, which are discussed below:

a) FRC notes that RG&E did not completely address LOCA parameter effects on the lubrication system, insulation, and other components of the motor. Actually, Reference 2.18, WCAP-7410-L, provides this information. RG&E has added a small amount of ARCO Rotanium lubricant to the original Westinghouse lubricant. Although the Rotanium lubricant does not have any specific testing for post-LOCA radiation, the small amount added (estimated by review of plant records of the fan cooler motor maintenance history at no more than 10%) is not expected to adversely affect the performance of the lubrication system. As a result of this review, however, RG&E will no longer use the Rotanium lubricant, but will use a Chevron product which is equivalent to the original Westinghouse lubricant, with a radiation resistance of 5 x 10° rads. Qualification information regarding this lubricant is being obtained. It will be submitted following receipt by RG&E. RG&E, therefore, considers the lubrication system acceptable for postaccident operation.

FRC also noted that splice material is still in question. This will be addressed in 21.c) below. RG&E has confirmed that Okonex tape and Elastimould No. 86 was not used for splice material in the fan cooler motors.

FRC also notes the confusion created by RG&E references 2.67 and 2.20. The fan cooler motor insulation is 'Thermalastic Epoxy." This is consistent with the gualification documentation provided by WCAP-9003 and WCAP-7410-6. Reference 2.67 will be corrected when the Ginna Environmental Qualification Report is resubmitted

b)

A review was made of plant maintenance records to determine if the fan cooler motor bearings, or other motor components had had any noted failures or degradation. No such evidence was found. RG&E will include the fan cooler motor bearings in the maintenance/ surveillance program described in Reference 72.



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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 55

LICENSEE RESPONSE TO NRC SER (Continued)

Although Westinghouse drawings 206C391, referenced via C) transmittal of supplemental information for Reference 2.64, is not an "as-built" for Ginna, RG&E has every reason to expect this to be the proper splice material. Reference 2.64 indicates that the splice met all required test parameters, including pressure, chemical spray, and radiation. RG&E believes that it was an oversight in not specifying accident temperatures along with the accident pressures of 60 psig for 2 hours and 20 psig for 18 hours; however, it is expected that at least 286°F was used together with 60 psig, and 219°F with 20 psig, since this corresponds well to the general Westinghouse qualification profile in use at that time (see WCAP-7410-L), and because the specified test conditions are identical in every respect to those used in WCAP-7410-L, except for the omission of these temperatures.

Based on the testing performed as shown in Reference 2.64, RG&E concludes that the splice is acceptable for use inside containment. If during our Spring 1982 refueling shutdown it is found that the splice shown in Westinghouse drawing 206C391 is not the same as that used at Ginna, the lead-to-cable splice will be replaced with a fully qualified Raychem sleeve.

It should be noted that this information pertains only to the lead-to-cable splice. The motor-to-lead splice was tested together with the motor in WCAP-9003, and is thus qualified by virtue of the acceptability of the motor qualification test. Franklin Research Center A Division of The Franklin Institute 20th and Race Streets, Phila Pa 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 55

Checksheets 52 Thru 54 have been removed due to the

proprietary nature of information contained therein.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 55

MAINTENANCE AND REPLACEMENT SCHEDULE SUMMARY

The following information regarding the maintenance and replacement schedule(s) for components, sub-components, and materials has been provided by the Licensee.

grease with a cherron equivalent to the qualified westinghouse typeduring the spring 1982 refueling outage. A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. _____454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 56

Equipment Item No. 56 Medium Voltage Switchgear Located in Intermediate Building (Area #3) Westinghouse Model DB-50A 1600-A Controls Reactor Trip System Power (Plant ID Not Stated) Licensee Reference 2898 Required Operating Time: Seconds TER Checksheet No. 56 Reference 59, Section 4.6.1 Licensee Submittal: Page 10 [62]; Table 3, Page 9 [1]; FRC SCEW 58

| (See Section 3 of this TER for Legend) | | | | | | |
|---|-------|------------|------|-----------|-------|-----|
| R, T, QI, RT, P, H, CS, A, S, (R), M, I, M, RPN, EXN | , SEN | ı, @ | RE | s, N | lone, | , |
| Not stated, Not applicable | | | | | | |
| LISTING OF APPLICABLE CHECKSHEETS: | | | | | | |
| Contents | Chec | ckshe | et I | age | No. | |
| Equipment Item | la | | | | | |
| Summary of Licensee Responses to the NRC SER | lb | | | | | |
| Equipment Environmental Qualification Summary Forms | 2 | | | | | |
| Licensee Response to NRC SER | 3a, | 36, | ¥., | 34 | | |
| System Consideration Review | 36. | 40, | 4c, | 4, | ¥6., | 43 |
| Equipment Environmental Qualification Review | 5%, | 96, 98, | ×, | ≫4, ≫5 | ¥e, | ¥€, |
| Installed TMI Lessons Learned Implementation Equipment Summary | 6,đ , | 90 | | | | |
| Maintenance and Replacement Schedule Summary | 26, | 76, | × | | | |

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY:

| A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 | NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u> | Page 1b |
|--|---|------------|
| EQUIPMENT ENVIRONMENTAL QUALIFIC | CATION REVIEW OF EQUIPMENT ITEN | 1 NO. 56 |
| SUMMARY OF LICENSEE RESPONSES TO THE | NRC SER - ONLY CHECKED ITEMS ARE A | PPLICABLE: |
| X The Licensee (has/has not) provid | ied a response to the SER concerns. | |
| The Licensee (has/has not) specif qualified and/or will function wh environmental service conditions. | fically stated that the equipment b hen exposed to the applicable DBE | |
| The Licensee has presented inform outstanding qualification deficie | mation which shows there are no encies. | |
| X The Licensee (has/bas not) propos item whose qualification has not | sed a corrective action for this equipeen fully established. | ipment |
| X Justification for interim ope | eration (has/ has not) been provided ltem. | by the |
| \underline{X} Corrective action specified b | by the Licensee: | |
| Equipment replacement wit Equipment modification Equipment relocation abov Relocate or shield equipm X Verify qualification by a Equipment relocation to a Qualification testing of Other (| th qualified equipment we submergence level ment from radiation source additional (testing /analysis) a mild environment equipment in progress |) |
| The Licensee has provided oth that can be construed as a ba operation. | ner information for this equipment i asis for justification for interim | .te.a |
| X The Licensee (bas/nas not) pr corrective action. (Schedule action | ovided a schedule for the proposed for accomplishing the corrective | .) |
| The Licensee states that the equi and/or should be exempted from en DESIGNATION OF RESULTANT NRC QUALIFIC | ipment item does not require qualifing invironmental qualification. | REVIEW |
| - CIRCLED ITEM ONLY: (See Section 3 | of this TER for Legend) | |
| I.a Qualified I.b Modification II.a Qualification Not Established II.b Not Qualified | II.c Qualified Life Deficiency III.a Exempt III.b Not in Scope IV Documentation Not Availab) | le |
| | | |

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NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. _ 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 56

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

| NRC REQUIREMENTS | DESIGNATION: X = DEFICIENCY |
|---|--------------------------------|
| Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Establ Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Require | ished |
| Program Established to Identity Aging Degradation | |
| Criteria Regarding Aging Simulation Satisfied (if Required) | |
| Criteria Regarding Temperature/Pressure Exposure: | |
| o Peak Temperature Adequate | |
| o Peak Pressure Adequate | |
| o Duration Adequate | |
| o Required Profile Enveloped Adequately | |
| o Steam Exposure (Ir Reguired) Adequate | |
| Criteria Regarding Spray Satisfied | |
| Criteria Regarding Submergence Satisfied | |
| Criteria Regarding Radiation Satisfied | |
| Criteria Regarding Test Sequence Satisfied | |
| Criteria Regarding Test Failures or Severe Anomalies | |
| (If Any) Satisfied | |
| Criteria Regarding Functional Testing Satisfied | |
| Criteria Regarding Instrument Accuracy Satisfied | |
| Test Duration Margin (1 hour + Function Time) Satisfied | |
| Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I) | |
| | |

DESIGNATION: X = CATEGORY

NRC QUALIFICATION CATEGORY

I.a

I.D

II.a

II.D

II.c

Equipment Qualified Equipment Qualification Pending Modification _____ Equipment Qualification Not Established Equipment Not Qualified Equipment Satisfies All Requirements Except Qualified Life or Replacement Schedule Justified

III.a Equipment Exempt From Qualification III.D Equipment Not in the Scope of the Qualification Review IV Documentation Not Made Available

This equipment item was previously evaluated in Reference 59. See page 1A Equipment Item description.



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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 56

LICENSEE RESPONSE TO NRC SER

Item 4.6.1 addresses Medium Voltage switchgear, the reactor coolant pump breakers and reactor trip breakers. These will be discussed separately.

b) Reactor Trip Breakers - As correctly noted by FRC in the DITER, this equipment fails safe (open) upon loss of actuating power. This was also noted by NRC in their review of SEP Topic III-5.B, "Pipe Break Outside Containment," transmitted to RG&E by letter dated June 24, 1980 (see Table 1 of that report). It is thus not anticipated that a failure to trip when required will be a concern.

RG&E does not, however, have documentation to definitively demonstrate the functional capability of these trip breakers under HELB conditions. RG&E is thus planning to make an equipment evaluation to determine the potential degradation of this switchgear under such conditions. RG&E does not agree that documentation is required to "... demonstrate equipment functional capability for a time period of one hour plus the length of time it is required to operate." The occurrences of an HELB requiring reactor trip would be detectable by use of Reactor Protection System instrumentation. If automatic tripping did not occur, an operator could trip the electrical bus providing power to the control rods, either from the control room or locally in the turbine building. Upon this action, the reactor will trip, regardless of conditional trip breakers. It is expected that this action could be taken within 5 minutes.

Since the only function of these breakers is to open, and they are designed to fail-open in loss of power, RG&E does not consider the one-hour requirement to be at all appropriate for this situation.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 56

SYSTEM CONSIDERATION REVIEW

EVALUATION OF LICENSEE STATEMENT

The 2 icenses have elected to make an equipment evaluation to determine to potential degradation of this equipment under HELB Conditions (215°F, 0.8 PS1g, for 30 min.). However, not schedule date the bee provided for this Conectus action.

The 2 icanece state that the NRC Criteria Concerning I have + function time margin is not appliable to these iteme. This is not in accordance with NRC Criteria for margin associated with test/anafie (see section 2 of this regart).

A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. _____454_____

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la

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 57

Equipment Item No. 57 Medium Voltage Switchgear Located in Turbine Building (A-7) Westinghouse Electric Corporation Model DH-350E 1200-A Controls Power to Reactor Coolant Pump Motors Licensee reference not cited Required Operating Time: Seconds TER Checksheet No. 57 Reference 59, Section 4.6.1 Licensee Submittal: Page 10 [62]; Table 3, Page 9 [1]; FRC SCEW 68

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

R, T, QT, RT, P, H, CS, A, S, (R), M, I, M, RPN, EXN, SEN, QI, RPS, None,

Not stated, Not applicable

LISTING OF APPLICABLE CHECKSHEETS:

| Contents | Chee | cksh | eet 1 | Page | No. | |
|--|------------|------------|----------|------------|-----|------------|
| Equipment Item | la | | | | | |
| Summary of Licensee Responses to the NRC SER | 1b | | | | | |
| Equipment Environmental Qualification Summary Forms | 2 | | | | | |
| Licensee Response to NRC SER | 3a, | 315 | 3×., | 34 | | |
| System Consideration Review | 4a, | 4b, | 4c, | ¥d., | 48. | 4 £ |
| Equipment Environmental Qualification Review | 34, 58, | 96, 96, | ×, ×, | 99., 79 | ¥e, | A. |
| Installed TMI Lessons Learned Implementation Equipment Summary | θá, | 610 | | | | |
| Maintenance and Replacement Schedule Summary | Za, | 7,16, | 76 | | | |

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|---|---|------------|
| EQUIPMENT ENVIRONMENTAL QUALIFIC | ATION REVIEW OF EQUIPMENT ITEM N | 10. 57 |
| | | |
| SUMMARY OF LICENSEE RESPONSES TO THE N | RC SER - ONLY CHECKED ITEMS ARE APPL | ICABLE: |
| X The Licensee (has/has not) provide | d a response to the SER concerns. | |
| The Licensee (has/has not) specifi qualified and/or will function whe environmental service conditions. | cally stated that the equipment is in exposed to the applicable DBE | |
| The Licensee has presented informa outstanding qualification deficien | ition which shows there are no icies. | |
| The Licensee (has/has not) propose item whose qualification has not b | ed a corrective action for this equip been fully established. | ment |
| Justification for interim oper Licensee for this equipment it | ation (has/has not) been provided by em. | the |
| Corrective action specified by | the Licensee: | |
| Equipment replacement with Equipment modification | qualified equipment | |
| Equipment relocation above | submergence level | |
| Relocate or shield equipme | int from radiation source | |
| Equipment relocation to a | mild environment | |
| Qualification testing of e | quipment in progress | |
| Other (| |) |
| — The Licensee has provided othe that can be construed as a bas operation. | er information for this equipment ite sis for justification for interim | m |
| The Licensee (has/has not) pro corrective action. (Schedule action | ovided a schedule for the proposed for accomplishing the corrective .) | |
| X The Licensee states that the equip and/or should be exempted from env | oment item does not require qualifica | tion |
| DESIGNATION OF RESULTANT NRC QUALIFICA - CIRCLED ITEM ONLY: (See Section 3 of | ATION EVALUATION CATEGORY BASED ON RE of this TER for Legend) | VIEW |
| I.a Qualified | II.c. Qualified Life Deficiency | |
| I.b Modification | III.a Exempt | |
| ET a Qualification Not Established | III b Not in Scope | |

(I.a) Qualification Not EstablishedIII.b Not in ScopeII.b Not QualifiedIVDocumentation Not Available

Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila... Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. _____4574

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 52

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

| NRC REQUIREMENTS | DESIGNATION: X = DEFICIENCY |
|---|--------------------------------|
| Documented Evidence of Qualification Adequate | _X |
| Adequate Similarity Between Equipment and Test Specimen Establi | shed |
| Aging Degradation Evaluated Adequately | |
| Qualified Life or Replacement Schedule Established (If Required |) |
| Program Established to Identify Aging Degradation | |
| Criteria Regarding Aging Simulation Satisfied (If Required) | |
| Criteria Regarding Temperature/Pressure Exposure: | |
| o Peak Temperature Adequate | |
| o Peak Pressure Adequate | |
| o Duration Adequate | |
| Required Profile Enveloped Adequately | |
| o Steam Exposure (If Required) Adequate | |
| Criteria Regarding Spray Satisfied | |
| Criteria Regarding Submergence Satisfied | |
| Criteria Regarding Radiation Satisfied | |
| Criteria Regarding Test Sequence Satisfied | |
| Criteria Regarding Test Failures or Severe Anomalies | |
| (If Any) Satisfied | |
| Criteria Regarding Functional Testing Satisfied | |
| Criteria Regarding Instrument Accuracy Satisfied | |
| Test Duration Margin (1 hour + Function Time) Satisfied | |
| Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I) | |
| | |

NRC QUALTFICATION CATEGORY

DESIGNATION: X = CATEGORY

X = CATEGOR

| I.a | Equipment Qualified | |
|-------|--|----|
| I.b | Equipment Qualification Pending Modification | |
| II.a | Equipment Qualification Not Established | _X |
| II.b | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life | |
| | or Replacement Schedule Justified | |
| III.a | Equipment Exempt From Qualification | |
| III.D | Equipment Not in the Scope of the Qualification Review | |
| IV | Documentation Not Made Available | |

see pages 46 and 4c

This equipment item was previously evaluated in Reference 59. See page 1A Equipment Item description.

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Page 3a

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 57

LICENSEE RESPONSE TO NRC SER

Item 4.6.1 addresses Medium Voltage switchgear, the reactor coolant pump breakers and reactor trip breakers. These will be discussed separately.

 Reactor Coolant Pump Trip Breakers - Appendix E.2 states that the RCP Motors should be maintained operable during a HELB in the turbine building. Actually, the RCS design is such that natural circulation cooling will remove sufficient decay heat. The reactor coolant pumps switchgear provides only one safety-related function - to open and remove power to the pumps in the event of a small cold leg break LOCA. For this particular -accident, there will be no adverse environment in the turbine building. Thus, environmental qualification documentation is not required. Franklin Research Center A Division of The Franklin Institute 20th and Race Streets, Phila, Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 754

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO.

SYSTEM CONSIDERATION REVIEW

The Licensee has stated that this equipment item does not require environmental qualification and/or should be exempted from qualification. The Licensee's rationale has been evaluated and the reasons for <u>concurrence</u>/ non-concurrence with the technical basis of the Licensee's position are presented below.

Reason for Concurrence

- Equipment does not provide a safety function or mitigate the consequences of a design basis accident. Equipment Environmental Qualification is not required by the DOR Guidelines. (NRC Qualification Evaluation Category IIIa)
- Equipment is not exposed to a harsh environment by the accident it is intended to mitigate. See note (1) on page 4b. (NRC Qualification Evaluation Category IIIb)
- Backup (equipment/system) is available which completely performs the safety function. The backup (equipment/system) is environmentally qualified and appears to meet single active failure criterion. See note (1) on page 4b. (NRC Qualification Evaluation Category IIIa)

Reason for Non-Concurrence

- Backup (equipment/system) is not fully capable of performing the intended safety function or accident mitigating function.
- Backup (equipment/system) is not environmentally qualified and can be exposed to a hostile environment simultaneously with the primary equipment.
- Backup (equipment/system) is subject to a potentially disabling single active failure.
- Failure of the primary equipment can compromise the ability of other safety-related equipment to perform its specified safety function.
- Failure of the primary equipment can result in erroneous indication which could mislead an operator.
- Requirement for continued functioning throughout the post-accident period necessitates environmental qualification.

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 57

Reason for Concurrence

- _____ The equipment's accident mitigating function is completed prior to the onset of the hostile environment. No subsequent functions are necessary. See note (1) below. (NRC Qualification Evaluation Category IIIb)
- Other (see page)
- Resultant NRC Qualification Evaluation Category (IIIa/IIIb)
- Note 1: The Licensee (has/ nas not) stated that failure of the primary equipment will not affect other safety-related equipment or cause an operator to be misled. (See page ___)

Reason for Non-Concurrence

- X Although backup equipment is available, it is not technically sound to relinquish defense-in-depth for this function.
 - Backup (equipment/system) is not safety-related.
- This equipment is necessary for the operator to ensure an ESF system is performing its intended safety function.
- ____ The rationale presented by the Licensee is not supported by objective technical evidence.
- X Other (see page 46)

LICENSEE STATEMENT

See page 3a of this checksheet.

EVALUATION OF LICENSEE STATEMENT

From a strictly deterministic viewpoint, there is no technical objection to the Licensee's response. TER-C5257-178 never advocated the position that natural circulation cooling was insufficient or that the RCP breakers would fail to perform their trip function in the event of a loss-of-coolant accident (LOCA).

The original concern was that the loss of PCP availability as a consequence of a HELB in the turbine building because of unqualified equipment would too readily relinquise one level of defense-in-depth. It was felt that it was highly desirable to retain a normal cooldown mode in this situation and not to rely on natural circulation cooling, unless necessary. This concern was not addressed in the Licensee's response. Franklin Research Center A Division of The Franklin Institute 20th and Race Streets, Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 57

SYSTEM CONSIDERATION REVIEW

EVALUATION OF LICENSEE STATEMENT (Continued)

This equipment should remain categorized as requiring environmental qualification until a decision is made by the NRC Staff that qualification is not required.

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| FRC Assignment No. 13 , |
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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 58

Equipment Item No. 58 I&C Cabinets Located in the Relay Room on Intermediate Level of Control Building (Area #8) Foxboro Co., Model Not Stated Provide Housing for I&C RP Circuits (Plant ID Not Stated) Licensee reference not cited Required Operating Time: Long term TER Checksheet No. 58 Reference 59, Section 4.7.13 Licensee Submittal: Not Stated; FRC SCEW 59

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

Not stated, (Not applicable)

LISTING OF APPLICABLE CHECKSHEETS:

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| Licensee Response to NRC SER | 36, | 36, | 36. | X | | |
| System Consideration Review | 44, | 48, | ×, | 40 | ₩, | Æ |
| Equipment Environmental Qualification Review | 94, 94, | 36, 31a, | ×, ×, | 59. 59. | ¥, | ≸€, |
| Installed TMI Lessons Learned Implementation Equipment Summary | 64, | 84 | | | | |
| Maintenance and Replacement Schedule Summary | 76. | 26. | 26 | | | |

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|--|--|---------------|
| EQUIPMENT ENVIRONMENTAL QUALIFIC | CATION REVIEW OF EQUIPMENT ITEM | NO. <u>58</u> |
| SUMMARY OF LICENSEE RESPONSES TO THE | NRC SER - ONLY CHECKED ITEMS ARE APP | LICABLE: |
| The Licensee (has/has not) provid | ed a response to the SER concerns. | |
| The Licensee (has/has not) specif qualified and/or will function wh environmental service conditions. | ically stated that the equipment is en exposed to the applicable DBE | |
| The Licensee has presented inform outstanding qualification deficie | ation which shows there are no ncies. | |
| The Licensee (has/has not) propos item whose qualification has not | ed a corrective action for this equi been fully established. | pment |
| Justification for interim ope Licensee for this equipment i | ration (has/has not) been provided b tem. | y the |
| Corrective action specified b | y the Licensee: | |
| Equipment replacement with Equipment modification Equipment relocation above Relocate or shield equipm Verify qualification by a Equipment relocation to a Qualification testing of Other (| h qualified equipment e submergence level ent from radiation source dditional (testing/analysis) mild environment equipment in progress |) |
| The Licensee has provided oth that can be construed as a ba operation. | er information for this equipment it sis for justification for interim | em |
| The Licensee (nas/nas not) processes of the corrective action. (Schedule action) | ovided a schedule for the proposed for accomplishing the corrective . |) |
| The Licensee states that the equi and/or should be exempted from en | pment item does not require qualific vironmental qualification. | ation |
| DESIGNATION OF RESULTANT NRC QUALIFIC - CIRCLED ITEM ONLY: (See Section 3 | ATION EVALUATION CATEGORY BASED ON R of this TER for Legen1) | EVIEW |
| I.a Qualified I.b Modification II.a Qualification Not Established II.b Not Qualified | II.c Qualified Life Deficiency III.a Exempt III.D Not in Scope IV Documentation Not Available | |

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DESIGNATION:

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 38

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

X = DEFICIENCY NRC REQUIREMENTS Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Sarisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

DESIGNATION: X = CATEGORY

NRC QUALIFICATION CATEGORY

I.a

I.b

II.a

Equipment Qualified Equipment Qualification Pending Modification _____ Equipment Qualification Not Established II.b Equipment Not Qualified Equipment Satisfies All Requirements Except Qualified Life II.C or Replacement Schedule Justified III.a Equipment Exempt From Qualification III.b Equipment Not in the Scope of the Qualification Review

Documentation Not Made Available IV

MILD ENVIRONMENT



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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 59

Equipment Item No. 59 Various Relay Racks Located in Relay Room on Intermediate Level of Control Building Westinghouse, Model Not Stated Licensee reference not cited Required Operating Time: Long term TER Checksheet No. 59 Reference 59, Section 4.7.13 Licensee Submittal: Table 3, Page 10 [1]; FRC SCEW 71

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None, Not stated, Not applicable

LISTING OF APPLICABLE CHECKSHEETS:

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| Equipment Item | la | | | | | | |
| Summary of Licensee Responses to the NRC SER | lb | | | | | | |
| Equipment Environmental Qualification Summary Forms | 2 | | | | | | |
| Licensee Response to NRC SER | 36, | ж, | ж, | 34 | | | |
| System Consideration Review | 44, | 46, | *, | à. | xe, | \$ € | |
| Equipment Environmental Qualification Review | 5%, 99, | ж, %, | 96, 91, | ×, | ×, | ¥, | |
| Installed TMI Lessons Learned Implementation Equipment Summary | 64, | 50 | | | | | |
| Maintenance and Replacement Schedule Summary | 74. | 26, | TX | | | | |

| 1000 | |
|------|---|
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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 59

| SUMMARY OF LICENSEE RESPONSES TO THE NRC SER - ONLY CHECKED ITEMS ARE APPLICABLE: |
|---|
| |
| |
| The Licensee (has/has not) provided a response to the SER concerns. |
| The Licensee (has/has not) specifically stated that the equipment is qualified and/or will function when exposed to the applicable DBE environmental service conditions. |
| The Licensee has presented information which shows there are no outstanding qualification deficiencies. |
| The Licensee (has/has not) proposed a corrective action for this equipment item whose qualification has not been fully established. |
| Justification for interim operation (has/has not) been provided by the Licensee for this equipment item. |
| Corrective action specified by the Licensee: |
| Equipment replacement with qualified equipment Equipment modification Equipment relocation above submergence level Relocate or shield equipment from radiation source Verify qualification by additional (testing/analysis) Equipment relocation to a mild environment Qualification testing of equipment in progress Other () |
| The Licensee has provided other information for this equipment item that can be construed as a basis for justification for interim operation. |
| The Licensee (has/has not) provided a schedule for the proposed corrective action. (Schedule for accomplishing the corrective action) |
| The Licensee states that the equipment item does not require qualification and/or should be exempted from environmental qualification. |
| DESIGNATION OF RESULTANT NRC QUALIFICATION EVALUATION CATEGORY BASED ON REVIEW - CIRCLED ITEM ONLY: (See Section 3 of this TER for Legend) |
| I.a Qualified I.b Modification II.a Qualification Not Established II.b Not Qualified II.b Not Qualified II.c Qualified Life Deficiency III.a Exempt III.b Not in Scope IV Documentation Not Available |

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 59

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

NRC REQUIREMENTS

DESIGNATION: X = DEFICIENCY

Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately ____ o Sceam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied ----Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied

Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

NRC QUALIFICATION CATEGORY

DESIGNATION: X = CATEGORY

-

| I.a | Equipment Qualified | |
|-------|--|----|
| I.b | Equipment Qualification Pending Modification | |
| II.a | Equipment Qualification Not Established | |
| II.D | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life | |
| | or Replacement Schedule Justified | - |
| III.a | Equipment Exempt From Qualification | - |
| JII.D | Equipment Not in the Scope of the Qualification Review | _X |
| IV | Documentation Not Made Available | |

MILD ENVIRONMENT

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 60

Equipment Item No. 60 HVAC System Located Outside Containment (Area #8) Westinghouse System 2162 Provides HVAC of Control Room Atmosphere (Plant ID Not Stated) Licensee reference not cited Required Operating Time: Long term TER Checksheet No. 60 Reference 59, Section 4.7.14 Licensee Submittal: Table 3, Page 10 [1]; FRC SCEW 60

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

Not stated, Not applicable deferred)

LISTING OF APPLICABLE CHECKSHEETS:

Checksheet Page No. Contents la. Equipment Item Summary of Licensee Responses to the NRC SER 15 Equipment Environmental Qualification Summary Forms 2 34, 34, 34, 地 Licensee Response to NRC SER 钝,病,长,殆,按,狭 System Consideration Review 31, 36, 36, 36, 36, 36, 36, Equipment Environmental Qualification Review 53, 34, 34, 54 6a, 55 Installed TMI Lessons Learned Implementation Equipment Summary Maintenance and Replacement Schedule Summary 74, 76, 70

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|--|--|------------|
| EQUIPMENT ENVIRONMENTAL QUALIFIC | CATION REVIEW OF EQUIPMENT ITEM | NO. 60 |
| SUMMARY OF LICENSEE RESPONSES TO THE | NRC SER - ONLY CHECKED ITEMS ARE APP | LICABLE: |
| The Licensee (has/has not) provid | ed a response to the SER concerns. | |
| The Licensee (has/has not) specif qualified and/or will function wh environmental service conditions. | ically stated that the equipment is en exposed to the applicable DBE | |
| The Licensee has presented inform outstanding qualification deficie | ation which shows there are no ncies. | |
| The Licensee (has/has not) propositient whose qualification has not | ed a corrective action for this equi been fully established. | pment |
| Justification for interim ope Licensee for this equipment i | ration (has/has not) been provided b tem. | y the |
| Corrective action specified b | y the Licensee: | |
| Equipment replacement with Equipment modification Equipment relocation above Relocate or shield equipm Verify qualification by a Equipment relocation to a Qualification testing of Other (| h qualified equipment e submergence level ent from radiation source dditional (testing/analysis) mild environment equipment in progress |) |
| The Licensee has provided oth that can be construed as a ba operation. | er information for this equipment it sis for justification for interim | em |
| The Licensee (has/has not) pr corrective action. (Schedule action | ovided a schedule for the proposed for accomplishing the corrective | 1 |
| The Licensee states that the equi and/or should be exempted from en | pment item does not require qualific vironmental qualification. | ation |
| DESIGNATION OF RESULTANT NRC QUALIFIC - CIRCLED ITEM ONLY: (See Section 3 | ATION EVALUATION CATEGORY BASED ON R of this TER for Legend) | EVIEW |
| I.a Qualified I.b Modification II.a Qualification Not Established II.b Not Qualified | II.c Qualified Life Deficiency III.a Exempt III.b Not in Scope IV Documentation Not Available | |

Franklin Research Certer A Division of The Franklin Institute 20th and Race Streets, Phila, Pa. 19103 (215) 448-1000

NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 60

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

| NRC REQUIREMENTS | DESIGNATION: X = DEFICIENCY |
|---|--|
| | |
| Documented Evidence of Qualification Adequate | |
| Adequate Similarity Between Equipment and Test Specimen Establi | shed |
| Aging Degradation Evaluated Adequately | |
| Qualified Life or Replacement Schedule Established (If Required |) |
| Program Established to Identify Aging Degradation | |
| Criteria Regarding Aging Simulation Satisfied (If Required) | |
| Criteria Regarding Temperature/Pressure Exposure: | |
| o Peak Temperature Adequate | |
| o Peak Pressure Adequate | |
| o Duration Adequate | - |
| o Required Profile Enveloped Adequately | |
| o Steam Exposure (If Required) Adequate | |
| Criteria Regarding Spray Satisfied | |
| Criteria Regarding Submergence Satisfied | |
| Criteria Regarding Radiation Satisfied | |
| Criteria Regarding Test Sequence Satisfied | |
| Criteria Regarding Test Failures or Severe Anomalies | |
| (If Any) Satisfied | and the second sec |
| Criteria Regarding Functional Testing Satisfied | |
| Criteria Regarding Instrument Accuracy Satisfied | |
| Test Duration Margin (1 hour + Function Time) Satisfied | |
| Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I) | |
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NRC QUALIFICATION CATEGORY

DESIGNATION: X = CATEGORY

1

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I.a Equipment Qualified I.b Equipment Qualification Pending Modification ______ II.a Equipment Qualification Not Established ______ II.b Equipment Not Qualified ______ II.c Equipment Satisfies All Requirements Except Qualified Life ______ or Replacement Schedule Justified ______ III.a Equipment Exempt From Qualification ______ III.b Equipment Not in the Scope of the Qualification Review ______ IV Documentation Not Made Available ______

MILD ENVIRONMENT



EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. GL

Equipment Item No. 61 Cable Splices Located Inside Containment (Area #1) Raychem Co. Type WCSF-N Provide Circuit Continuity (Plant ID Not Stated) Licensee References 25, 35, 574, 2052, and 2099 Required Operating Time: Long term TER Checksheet No. 61 Reference 59, Section 4.5.2.5 Licensee Submittal: Page 9 [62]; Table 3, Page 10 [1]; FRC SCEW 61

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

(R) T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

Not stated, Not applicable

LISTING OF APPLICABLE CHECKSHEETS:

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|--|------------|------------|-----------|---------|-----|-----|
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| Equipment Environmental Qualification Summary Forms | 2 | | | | | |
| Licensee Response to NRC SER | 3a, | 弘, | ¢٤, | 38 | | |
| System Consideration Review | 44, | ₩, | ж, | 424, | ¥, | ¥ |
| Equipment Environmental Qualification Review | 34, 59, | 56, 56, | ₩, 51, | ₩, N | Ş€, | 5£, |
| Installed TMI Lessons Learned Implementation Equipment Summary | 6a., | 36 | | | | |
| Maintenance and Replacement Schedule Summary | 24, | 26, | ₩ | | | |

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. GL

SUMMARY OF LICENSEE RESPONSES TO THE NRC SER - ONLY CHECKED ITEMS ARE APPLICABLE: X The Licensee (has/ provided a response to the SER concerns. X The Licensee (has/has not) specifically stated that the equipment is qualified and not will function when exposed to the applicable DBE environmental service conditions. The Licensee has presented information which shows there are no outstanding gualification deficiencies. The Licensee (has/has not) proposed a corrective action for this equipment item whose qualification has not been fully established. Justification for interim operation (has/has not) been provided by the Licensee for this equipment item. Corrective action specified by the Licensee: Equipment replacement with qualified equipment Equipment modification Equipment relocation above submergence level Relocate or shield equipment from radiation source Verify qualification by additional (testing/analysis) Equipment relocation to a mild environment Qualification testing of equipment in progress Other (The Licensee has provided other information for this equipment item that can be construed as a bas's for justification for interim operation. The Licensee (has/has not) provided a schedule for the proposed corrective action. (Schedule for accomplishing the corrective action .) The Licensee states that the equipment item does not require gualification and/or should be exempted from environmental gualification. DESIGNATION OF RESULTANT NRC QUALIFICATION EVALUATION CATEGORY BASED ON REVIEW - CIRCLED ITEM ONLY: (See Section 3 of this TER for Legend) I.a) Qualified II.c Qualified Life Deficiency III.a Exempt I.b Modificat. n II.a Qualification Not Established III.b Not in Scope II.b Not Qualified IV Documentation Not Available

Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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DESIGNATION: X = DEFICIENCY

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 61

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

NRC REQUIREMENTS

Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 nour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

NRC QUALIFICATION CATEGORY

DESIGNATION: X = CATEGORY

| I.a | Equipment Qualified | _X_ |
|-------|--|-----|
| I.b | Equipment Qualification Pending Modification | |
| II.a | Equipment Qualification Not Established | |
| II.b | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life | |
| | or Replacement Schedule Justified | |
| III.a | Equipment Exempt From Qualification | |
| III.D | Equipment Not in the Scope of the Qualification Review | |
| VI | Documentation Not Made Available | |

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| and Nace Streets, Phila., Pa. 19103 (215) 448-1000 | and Race Streets. | Phila | Pa | 19103 | (215) | 448-1000 | |
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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 61

LICENSEE RESPONSE TO NRC SER

Item 4.5.2.5 addresses Raychem cable splices located inside containment. The only FRC finding concerned the omission of a qualified life. In fact, RG&E provided a qualified life of 40 years at 91°C, based on reference 2.63. It is not clear what the concern is.

As for the symbiotic classification of the cable and splice sleeves - we consider that this to be inappropriate. The cable and sleeves are purchased separately, and reviewed separately. Qualification documentation can be and should be addressed separately. RG&E notes again that the beta dose rate concerns for the cable goes beyond the DOR Guidelines, and should thus not be discussed in the context of this review but should be the subject of a separate independent review.

NRC Contract No. NRC-03-79-118 Page Franklin Research Center FRC Project No. C5257 A Division of The Franklin Institute 5f FRC Assignment No. 13 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 FRC Task No. 454 EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 61 NOTES: This equipment item was previously evaluated in Reference 59. See page 1A Equipment Item description. hP un 2120 Ined ueste ler

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| NRC | Contract No. NRC-03-79-118 |
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| FRC | Project No. C5257 |
| FRC | Assignment No. 13 , |
| FRC | Task No. 454 |

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 62

Equipment Item No. 62 (TMI Action Plan Item) Level Switches Located Inside Containment (Area #1) Gems Corporation, Special Model, Similar to LS-1900 Containment Sump "B" Level (LC-942 and -943) Licensee reference not cited Required Operating Time: Not specified TER Checksheet No. 62 Reference 59, Section 4.7.11 Licensee Submittal: Table 3, Page 10 [1]; FRC SCEW 63

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend) R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None, Not stated, Not applicable deferred

LISTING OF APPLICABLE CHECKSHEETS:

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| Equipment Environmental Qualification Summary Forms | 2 | | | | | |
| Licensee Response to NRC SER | 3æ, | 36, | ×, | × | | |
| System Consideration Review | 46, | 4%。 | ₩, | 4 0, | 4×, | ¢É |
| Equipment Environmental Qualification Review | 54 , 59, | 5 b , 5h, | ¥C, 91, | 34, 33 | 98. | 9K., |
| Installed TMI Lessons Learned Implementation Equipment Summary | 5×2, | 615 | | | | |
| Maintenance and Replacement Schedule Summary | ta, | 7/0, | Xc | | | |

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| UIPMENT ENVIRONMENTAL QUALIFICA | TION REVIEW OF EQUIPMENT TIEM NO. |
|--|---|
| | |
| JMMARY OF LICENSEE RESPONSES TO THE N | RC SER - ONLY CHECKED ITEMS ARE APPLICABL |
| Tne Licensee (has/has not) provide | d a response to the SER concerns. |
| The Licensee (has/has not) specifi qualified and/or will function whe environmental service conditions. | cally stated that the equipment is n exposed to the applicable DBE |
| The Licensee has presented informa outstanding qualification deficien | tion which shows there are no cies. |
| The Licensee (has/has not) propose item whose qualification has not b | d a corrective action for this equipment een fully established. |
| Justification for interim oper Licensee for this equipment it | ation (has/has not) been provided by the em. |
| Corrective action specified by | the Licensee: |
| Equipment replacement with Equipment modification Equipment relocation above Relocate or shield equipme Verify qualification by ad Equipment relocation to a Qualification testing of e Other (| <pre>qualified equipment submergence level ont from radiation source ditional (testing/analysis) mild environment equipment in progress)</pre> |
| The Licensee has provided other that can be construed as a bas operation. | er information for this equipment item is for justification for interim |
| The Licensee (has/has not) pro corrective action. (Schedule action | for accomplishing the corrective) |
| The Licensee states that the equip and/or should be exempted from env | oment item does not require qualification vironmental qualification. |
| ESIGNATION OF RESULTANT NRC QUALIFIC CIRCLED ITEM ONLY: (See Section 3 of | ATION EVALUATION CATEGORY BASED ON REVIEW of this TER for Legend) |
| .a Qualified .b Modification I.a Qualification Not Established | II.c Qualified Life Deficiency III.a Exempt III.b Not in Scope |
| I.b Not Qualified | IV Documentation Not Available |
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NRC QUALIFICATION CATEGORY

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 62

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

| NRC REQUIREMENTS X = DEF | ATION: ICIENCY |
|--|-------------------|
| Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established | _ <u>X_</u> |
| Aging Degradation Evaluated Adequately | |
| Qualified Life or Replacement Schedule Established (If Required) | |
| Program Established to Identify Aging Degradation | |
| Criteria Regarding Aging Simulation Satisfied (If Required) | |
| Criteria Regarding Temperature/Pressure Exposure: | |
| o Peak Temperature Adequate | |
| o Peak Pressure Adequate | |
| o Duration Adequate | |
| o Required Profile Enveloped Adequately | |
| o Steam Exposure (If Required) Adequate | |
| Criteria Regarding Spray Satisfied | |
| Criteria Regarding Submergence Satisfied | |
| Criteria Regarding Radiation Satisfied | |
| Criteria Regarding Test Sequence Satisfied | |
| Criteria Regarding Test Failures or Severe Anomalies | |
| (If Any) Satisfied | - |
| Criteria Regarding Functional Testing Satisfied | |
| Criteria Regarding Instrument Accuracy Satisfied | |
| Test Duration Margin (1 hour + Function Time) Satisfied | |
| Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I) | |

DESIGNATION:

Equipment Qualified I.a Equipment Qualification Pending Modification I.b <u>×</u> II.a Equipment Qualification Not Established II.b Equipment Not Qualified II.c Equipment Satisfies All Requirements Except Qualified Life or Replacement Schedule Justified _____ III.a Equipment Exempt From Qualification III.D Equipment Not in the Scope of the Qualification Review Documentation Not Made Available IV

See pages 5g and 5f

X = CATEGORY

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 62

NOTES:

This equipment item was previously evaluated in Reference 59.

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LICENSEE RESPONSE:

Reference 2.52, the specification sheet for this item, was provided to the NRC and FRC on September 24, 1980. There is evidence that these level switches can perform their function in a containment post-accident environment. However, not all of the requirements of the DOR Guidelines are met for this instrumentation. It is important to note, however, that these instruments are not used to perform any post-accident safety-related functions and are not specified for use in the Ginna Emergency Procedures except as confirmatory information. The safety-related function of determining the timing of the "sump switchover" procedure is performed by the RWST level instrumentation, located outside containment.

The TMI Lessons Learned determined that a wide-range sump level indication was to be provided for operator information. Fully qualified equipment will be purchased to meet this requirement. The qualification documentation for this instrumentation will be made available when received.

Selened as TMJ artim lansel statul

Containment Sump "A" Level - The design analysis for this instrumentation is included.

Evaluation the net passible from the

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Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila Pa 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 62

INSTALLED TMI LESSONS LEARNED IMPLEMENTATION EQUIPMENT SUMMARY

NRC requested an evaluation of the environmental qualification of safetyrelated electrical equipment located in harsh environments required for TMI Lessons Learned Implementation. The objective is to evaluate qualification documentation of equipment within the scope of IE Bulletin 79-01B, Supplement 3 (item 2), in accordance with criteria established by the NRC (see Section 2 of this report) in a manner identical to the evaluation of all other safetyrelated electrical equipment. The scope of this review is limited to TMI Action Plan equipment associated with specific sections of NUREG-0737 which have an installation implementation date of January 1, 1981 (sections are identified below). Where applicable, a review is to be performed on installed equipment with implementation dates after January 1, 1981 if adequately identified by the licensee.

This plant is a PWR X, BWR . The NSSS Vendor is Westinghouse (W) X, Babcox & Wilcox (B&W) , Combustion Engineering (CE) , Coneral Electric (GE) .

With respect to this equipment item, it is noted (applicable section checked):

- ____ The Licensee does not provide adequate information with respect to identification of TMI Action Plan equipment installed as of 1/1/81.
- The Licensee has not provided the correlation of this equipment item with the specific sections of NUREG-0737. [The correlation is needed to ensure that all items are included in the review, e.g., if a transmitter is identified as a TMI Action Plan item, are the cable and the terminal blocks associated with the device also identified?]
- ____ The Licensee has not provided the approximate installation date for the TMI Action Plan equipment items so that the appropriate qualification criteria (NUREG-0588 or DOR Guidelines) can be used in the EEQ evaluation.
- The Licensee has provided a standard Owners' Group position with respect to a NUREG-0737 technical area.
- ____ The Licensee has requested extensions of implementation dates.

X TT F.I Containment Water Level Monitor

- The Licensee has stated that this equipment item is associated with the following section of NUREG-0737. (This list of applicable NUREG-0737 sections has been identified by NRC as sections within the scope of this review):
 - ____ II.B.3 (ALL/1-1-81) Post-Accident Sampling Capability of Reactor Coolant and Containment
 - ____ II.D.3 (ALL/1-1-81) Direct Indication of Relief and Safety Valve Position

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| NRC Contract No. NRC-03-79-11 |
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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 63

Equipment Item No. 63 (TMI Action Plan Item) Hydrogen Recombiner Igniter Exciter Units Located Inside Containment (Area #1) Westinghouse GLA Part No. 43737, Rev. A Hydrogen Recombination (Plant ID Not Stated) Licensee References 585, 637, and 639 Required Operating Time: Long term TER Checksheet No. 63 Reference 59, Section 4.7.18 Licensee Submittal: Page 14 [62]; Table 3, Page 11 [1]; FRC SCEW 64

| DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - | CIR | CLED | ITE | M(S) | ONL | 'A : |
|---|--------------------|------------|-----------|-----------|-------|------|
| (See Section 3 of this TER for Legend) | | | | | | |
| R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, | SEN | , QI | , RF | S, N | ione, | |
| Not stated, Not applicable deferred | | | | | | |
| LISTING OF APPLICABLE CHECKSHEETS: | | | | | | |
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| Licensee Response to NRC SER | 3a, | 38. | 38. | 32 | | |
| System Consideration Review | 44, | 4×6, | 44, | 4d. | 48. | 4K |
| Equipment Environmental Qualification Review | 3a , 59, | 58, 58, | э¢, Ж, | 5%, 3% | ×. | 5f, |
| Installed TMI Lessons Learned Implementation Equipment Summary | 6a, | 6b | | | | |
| Maintenance and Replacement Schedule Summary | %, | 740, | 20 | | | |

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 13

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SUMMARY OF LICENSEE RESPONSES TO THE NRC SER - ONLY CHECKED ITEMS ARE APPLICABLE: X The Licensee (has/has not) provided a response to the SER concerns. The Licensee (has/has not) specifically stated that the equipment is qualified and/or will function when exposed to the applicable DBE environmental service conditions. The Licensee has presented information which shows there are no outstanding qualification deficiencies. X The Licensee (has/has not) proposed a corrective action for this equipment item whose qualification has not been fully established. Justification for interim operation (has/has not) been provided by the Licensee for this equipment item. X Corrective action specified by the Licensee: Equipment replacement with gualified equipment Equipment modification Equipment relocation above submergence level Relocate or shield equipment from radiation source Verify qualification by additional (testing/analysis) Equipment relocation to a mild environment Qualification testing of equipment in progress X Other (Analyze or replace switch The Licensee has provided other information for this equipment item that can be construed as a basis for justification for interim operation. X The Licensee (has/has not) provided a schedule for the proposed corrective action. (Schedule for accomplishing the corrective action June 30, 1982 •) The Licensee states that the equipment item does not require qualification and/or should be exempted from environmental qualification. DESIGNATION OF RESULTANT NRC QUALIFICATION EVALUATION CATEGORY BASED ON REVIEW - CIRCLED ITEM ONLY: (See Section 3 of this TER for Legend) I.a Qualified II.c Qualified Life Deficiency (.b) Modification III.a Exempt II.a Qualification Not Established III.b Not in Scope II.b Not Qualified IV Documentation Not Available

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 43

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

DESIGNATION: X = DEFICIENCY NRC REQUIREMENTS Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

DESIGNATION: X = CATEGORY

I.a Equipment Qualified Equipment Qualification Pending Modification I.b _____ Equipment Qualification Not Established II.a II.D Equipment Not Qualified Equipment Satisfies All Requirements Except Qualified Life II.c or Replacement Schedule Justified III.a Equipment Exempt From Qualification III.b Equipment Not in the Scope of the Qualification Review Documentation Not Made Available IV

Note: The modification recessary is in conjunction with the blower pressure switches which the Licensee has committed to replace or analyze the equipment to assure qualification of the overall unit by June 30, 1982.

Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 63

LICENSEE RESPONSE TO NRC SER

A number of items listed as NRC Category VI, "Equipment for Which Qualification is Deferred," should also be included in this review. The specific items and reasons are given below:

a) Items 4.7.3 and 4.7.18 address portions of the Hydrogen Recombiner unit. This is a "TMI-related" item; however, deferral of review is not necessary, since the unit is already installed. The FRC review directed that an overall life of the motor should be established, and that a review of the motor's bearing, splices, and lubrication system should be made. Based on the intermittent use of the recombiner, a 40-year life would be expected. However, period maintenance and surveillance, per Reference 72, will account for potential failures, including age-related causes. As for the lead-to-cable splice, Westinghouse has noted that the information in Reference 2.64 is applicable. At the next scheduled refueling shutdown of Spring 1982, RG&E will verify that the proper splice material was used. If not, the splices will be replaced with qualified Kaychem sleeves.

FRC also noted additional concerns in item 4.7.13, relative to other recombiner system components. Additional information from Westinghouse states that the ignition lead and thermocouple leads are completely housed in a pressure-tight system with the connections field-brazed. There are no blower damper control solenoids for the RG&E recombiner; the dampers are manually set. Splices have been addressed already. There are no terminal blocks on the RG&E recombiner.

The only items not fully gualified are the Barton pressure switches. Qualification data will be established for these switches, or gualified replacements will be provided by June 30, 1982. Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phile. Pa. 19103 (215) 448-1000

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NOTES: m aressed em NUREG TMT 0578 ssons earned ask Status Kepor orce an Recommendations erm 0 00 ased 0no eneur Re Co renc 585 637 39 and 10 in erma owing 15 n radiation R AL demon 1 augle 0. can 1 h ha 1 submitte drawing stinghous an rale. nx spurte regrade he 8 N learn 0 vertranen contain men 1 1h 3 h. 13 previously tem a 大 am cause a M 0 1 cense has otated thon Ren 10 0 1 600 02 ready 4 A sta A an lul 2 G ua arton ausmitters essur

NRC Contract No. NRC-03-79-118 2 Page Franklin Research Center FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454 50 A Division of The Franklin Institute 20th and Race Streets. Phila . Pa 19103 (215) 448-1000 FRC Task No. _

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 63

NOTES: 5 committed anglinge cense has he ha eressure 19 ustern an ign inno Lu n 1 com lund 10 -0 6 materials of construction an he forma tion resex 11 in 221 nels 2 anal. und oli 10 the 241 ear 01 ma 10 4 20 rigrans 20 11 n a ipte A U and 4 1 comption -M 40 0 in nell main 2 ending 100 1 laupmen ans natified 3

n f

Franklin Research Center A Division of The Franklin Institute 20th and Race Streets, Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FR 7 Task No. 454

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 63

INSTALLED TMI LESSONS LEARNED IMPLEMENTATION EQUIPMENT SUMMARY

NRC requested an evaluation of the environmental qualification of safetyrelated electrical equipment located in harsh environments required for TMI Lessons Learned Implementation. The objective is to evaluate qualification documentation of equipment within the scope of IE Bulletin 79-01B, Supplement 3 (item 2), in accordance with criteria established by the NRC (see Section 2 of this report) in a manner identical to the evaluation of all other safetyrelated electrical equipment. The scope of this review is limited to TMI Action Plan equipment associated with specific sections of NUREG-0737 which have an installation implementation date of January 1, 1981 (sections are identified below). Where applicable, a review is to be performed on installed equipment with implementation dates after January 1, 1981 if adequately identified by the licensee.

This plant is a PWR X, BWR . The NSSS Vendor is Westinghouse (W) X, Babcox & Wilcox (B&W) , Combustion Engineering (CE) , General Electric (GE) .

With respect to this equipment item, it is noted (applicable section checked):

- The Licensee does not provide adequate information with respect to identification of TMI Action Plan equipment installed as of 1/1/81.
- The Licensee has not provided the correlation of this equipment item with the specific sections of NUREG-0737. [The correlation is needed to ensure that all items are included in the review, e.g., if a transmitter is identified as a TMI Action Plan item, are the cable and the terminal blocks associated with the device also identified?]
- _____ The Licensee has not provided the approximate installation date for the TMI Action Plan equipment items so that the appropriate qualification criteria (NUREG-0588 or DOR Guidelines) can be used in the EEQ evaluation.
- The Licensee has provided a standard Owners' Group position with respect to a NUREG-0737 technical area.
- The Licensee has requested extensions of implementation dates.
- The Licensee has stated that this equipment item is associated with the following section of NUREG-0737. (This list of applicable NUREG-0737 sections has been identified by NRC as sections within the scope of this review):
 - II.B.3 (ALL/1-1-81) Post-Accident Sampling Capability of Reactor Coolant and Containment
 - ____ II.D.3 (ALL/1-1-81) Direct Indication of Relief and Safety Valve Position

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- ____ II.E.1.2 (PWR/1-1-81) Auxiliary Feedwater System Automatic Initiation and Flow Indication
- ____ II.E.3.1 (PWR/1-1-81) Emergency Power Supply for Pressurizer Heaters (Safety-Grade Interfaces
- II.E.4.1 (ALL/7-1-81) Dedicated Hydrogen Penetrations
- ____ II.E.4.2 (ALL/1-1-81) Containment Isolation Dependability
- ____ II.F.2 (PWR/1-1-81) Instrumentation for Detection of Inadequate Core Cooling
- ____ II.G.1 (PWR/1-1-81) Emergency Power for Pressurizer Equipment (Safety-Grade Interfaces)
- ____ II.K.2.10 (PWR/B&W/7-1-81) Safety-Grade Anticipatory Reactor Trip
- II.K.3.9 (PWR/W/1-1-81) PIJ Controller Modification (If Hardware Change Involved)
- ____ II.K.3.12 (PWR/W/1-1-81) Anticipatory Reactor Trip upon Turbine Trip
- II.K.3.13 (BWR/GE/7-1-81) Separation of HPCI and RCIC Initiation Signals
- ____ II.K.3.15 (BWR/GE/7-1-81) Prevention of Spurious Isolation of HPCI and RCIC Systems
- II.K.3.19 (BWR/GE/7-1-81) Interlock on Recirculation Pump Loop
- II.K.3.21 (BWR/GE/7-1-81) Restart of Core Spray and LPCI Systems (In Hardware Changed Out)
- ____ II.K.3.27 (BWR/GE/7-1-81) Provide Common Reference Level for Vessel Level Instrumentation (If Hardware Changed Out)
- NOTE: This equipment item is addressed in NUREG - 0578 "TMI-2 Lessons Learned Tack Force Status Report and Short-Term Recommendations", Section 2.1.5.C

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 64

Equipment Item No. 64 (TMI Action Plan Item II.D-3) Limit Switch Located Inside Containment (Area #1) NAMCO, Model Not Stated Position Indication for the Pressurizer Safety and Relief Valves (Plant ID Not Stated) Licensee References 2041 and 2795 Required Operating Time: Not specified TER Checksheet No. 64 Licensee Submittal: Page 1 [65]; FRC SCEW 73

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None, Not stated, Not applicable

LISTING OF APPLICABLE CHECKSHEETS:

| Contents | Chec | kshe | eet I | Page | No. | |
|---|------|------------|-----------|------|-----|-----|
| Equipment Item | la | | | | | |
| Summary of Licensee Responses to the NRC SER | lb | | | | | |
| Equipment Environmental Qualification Summary Forms | 2 | | | | | |
| Licensee Response to NRC SER | 3a, | ж, | Ĵø, | XE | | |
| System Consideration Review | 40. | 455. | 408., | 44L | ÷. | 44 |
| Equipment Environmental Qualification Review | 5a, | 5b, 5K, | 5c, ¥, | 5d, | 5e, | 5f, |
| Installed TMI Lessons Learned Implementation Equipment Summary | 6a, | 6K | | | | |
| Maintenance and Replacement schedule Summary | 26, | the, | te | | | |

| A Division of The Franklin Institute 20th and Race Streets. Phila . Pa. 19103 (215) 448-1000 | FRC Project No. C5257 FRC Assignment No. 13 FRC Task No | Page Ib |
|--|---|------------|
| QUIPMENT E VIRONMENTAL QUALIFI | CATION REVIEW OF EQUIPMENT ITEM | NO. 64 |
| SUMMARY OF LICENSEE RESPONSES TO THE | NRC SER - ONLY CHECKED ITEMS ARE APP | LICABLE: |
| The Licensee (has/has not) provid | ded a response to the SER concerns. | |
| X The Licensee (has/has not) specific qualified and/or will function whenvironmental service conditions. | fically stated that the equipment is hen exposed to the applicable DBE | |
| X The Licensee has presented inform outstanding qualification deficie | mation which shows there are no encies. | |
| The Licensee (has/has not) propos item whose qualification has not | sed a corrective action for this equi been fully established. | pment |
| Justification for interim ope Licensee for this equipment i | eration (has/has not) been provided b item. | y the |
| Corrective action specified b | by the Licensee: | |
| Equipment replacement wit Equipment modification | th qualified equipment | |
| Equipment relocation abov | ve submergence level | |
| Relocate or shield equipm | ment from radiation source | |
| Verify qualification by a | additional (testing/analysis) | |
| Equipment relocation to a | a mild environment | |
| Other (| equipment in progress |) |
| The Licensee has provided oth that can be construed as a ba operation. | ner information for this equipment it asis for justification for interim | em |
| The Licensee (has/has not) pr corrective action. (Schedule action | ovided a schedule for the proposed for accomplishing the corrective . |) |
| The Licensee states that the equi and/or should be exempted from en | pment item does not require qualification. | ation |
| DESIGNATION OF RESULTANT NRC QUALIFIC - CIRCLED ITEM ONLY: (See Section 3 | CATION EVALUATION CATEGORY BASED ON RU of this TER for Legend) | EVIEW |
| I.a Qualified I.b Modification | II.c Qualified Life Deficiency III.a Exempt | |
| II.a Qualification Not Established | III.b Not in Scope | |
| II.b Not Qualified | IV Documentation Not Available | |
| | | |

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20th and Race Streets. Phila. . Pa. 19103 (215) 448-1000

NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 14

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

DESIGNATION: X = DEFICIENCY NRC REQUIREMENTS Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established X Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 nour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

NRC QUALIFICATION CATEGORY

DESIGNATION: X = CATEGORY

| Equipment Qualified | |
|--|---|
| Equipment Qualification Pending Modification | |
| Equipment Qualification Not Established | _X_ |
| Equipment Not Qualified | |
| Equipment Satisfies All Requirements Except Qualified Life | |
| or Replacement Schedule Justified | |
| Equipment Exempt From Qualification | |
| Equipment Not in the Scope of the Qualification Review | |
| Documentation Not Made Available | |
| | Equipment Qualified Equipment Qualification Pending Modification Equipment Qualification Not Established Equipment Not Qualified Equipment Satisfies All Requirements Except Qualified Life or Replacement Schedule Justified Equipment Exempt From Qualification Equipment Not in the Scope of the Qualification Review Documentation Not Made Available |

The submittal does not identify the model number of the installed equipment of the interface seal.



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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 64

Attachment: TMI Equipment Installed and Operable

 Pressurizer Relief Valve Position Indication - The appropriate portions of the NAMCO limit switch qualification test report are included. The entire report is on file at Ginna.



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| EQUIPMENT | ENVIRONMENTAL QU | ALIFICATION REVIEW | |
|---|-----------------------|--------------------------------|----------------------------------|
| Criteria: DOR Guidelines | X; NUREG-0588, | Cat. I; NUREG-0588, | Cat. II |
| NRC REQUIREMENTS WITH SECTION REFERENCE (DOR/0588-I/0588-II) | LICENSEE SUBMITTAL | QUALIFICATION DOCUMENTATION | DEFICIENCY (X OR NOTE NO.) |
| EQUIPMENT DESCRIPTION Equipment Type | Limit | Limit Swite | h |
| Manufacturer's Name (5.2.2/-/-) | NAMED | NAMCO | |
| Model Number (5.2.2/-/-) | NETATE | EA-180-11302 | Ense note |
| Serial Number | Not stated | #-138-90 |); (×) / |
| <pre>Features/Mounting (5.2.6/-/-)</pre> | stated | | |
| Connections/Interfaces (5.2.6/-/-) | stated | Sorterna & | + X3 |
| Location/Elevation | NOTSTATED | excusament | |
| Equipment ID No. | Notstaty | not Stated | |
| QUALIFICATION REPORT (8.0/5.0/5.0) | 1 1 | | i ma nate |
| Report ID Number | T.R. 3613-PP | T.R. 3613-PP | 2 |
| Report Date | 2/15/80 | 2/15/80 | |
| Issued by | ACME | ACME CLEVELON. | 0 |
| Prepared for | NAMCO | NAMO | |
| Referenced Reports | Not Stated | ER-1418 | |
| Qualification Method (5.1, 5.3/2.1, 2.4/2.1, 2. | 4) TEST | + EST | 1 |
| QUALIFICATION TEST PROGRAM Functional Test Descriptio (5.2.5/2.2.9/2.2.9) | on Not | Trip anglean Torque Test. | ~ |
| Operating Conditions (-/2.2.10/2.2.10) | Nat | mat Mitul | |
| Current/Freq. | States | 100 praces | |

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| NRC REQUIREMENTS WITH SECTION REFERENCE (DOR/0588-1/0588-11) | LICENSEE SUBMITTAL | QUALIFICATION | DEFICIENCY (X OR NOTE NO.) |
|--|-----------------------|---------------------------|----------------------------------|
| Acceptance Criteria (5.2.5/2.2.1/2.2.1) | NOT | not specified | |
| Accuracy (5.2.5/-/-) | NOT | sent spicified | |
| Number of Specimens | NOTSTAJED ! | / | \$ |
| Test Instruments Calibrated | NOUSTATED | yes | |
| Safety Function (Active/ Passive) (-/2.1.3/2.1.3) | Actint | actine | |
| Test Duration (5.2.1/-/-) | NOTATED | 30 days | |
| Accident Duration (Envir. Above Normal) (5.2.1/-/-) | 124h | not applicate | |
| Required Function Time | not | not stated | |
| Test Sequence (General) (5.2.3/2.3.1/2.3.1) | states | Othermalaging | |
| Test Sequence (NUREG-0588, Cat. I) (-/2.3.1/-) | | @ meetines we | n. |
| Representative Sample Baseline Data Performance Extremes Thermal Aging Radiation Aging | | Birradiation & Seismie | |
| Wear Aging Vibration/Seismic DBE Exposure Post-DBE Exposure Inspection | | (5) LOCA | |
| Aging (5.2.4, 7.0/4.0/4.0) Thermal Aging/Basis | Notated | 120°C /400h. | |
| Material Aging Evaluation (7.0/-/-) | states | arhenius | |
| Materials Susceptible (Thermal) (5.2.4, 7.0/-/-) | monted | not stated | |
| Radiation Aging, Type | Jamma | selacudent dos | |

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| NRC REQUIREMENTS WITH SECTION REFERENCE | LICENSEE | QUALIFICATION | DEFICIENCY (X OR |
|--|---------------|----------------|---------------------|
| (DOR/0588-I/0588-II) | SUBMITTAL | DOCUMENTATION | NOTE NO.) |
| | ; | Sector Sectors | 1 |
| Radiation Aging, Dose (rd) | <10%rd | see accident | |
| Radiation Aging, Dose Rate | Kied/h. | dise | 1 |
| Radiation Aging, Method | mostated : | | 1 |
| Materials Susceptible (Radiation) (5.2.4, 7.0/-/-) | notated | not stoled | : |
| Operational Aging (-/4.2/-) | not stated | 100,200 cycles | |
| Other Age Conditioning $(-/4.2/-)$ | untstated | mat states | |
| Qualified Life Claimed/ | plant : | mit placed | 1.1.1.1 |
| Established (5.2.4/4.10/-) | lip | | |
| Normal Ambient Temperature | : 60-1200F: | + splicable | |
| Normal Ampient Radiation | : Kindth : | noraggan | : |
| Normal Ambient Humidity | : 50% mm. | 0.0 | |
| On-Going Surveillance and | | Astated | |
| Preventive Maintenance | : Ginna : | realizer | 1 |
| (7.0/-/-) | ! PROGRAM! | * | : |
| | | + alaled | |
| On-Going Analysis of |) POR-30 | no por | |
| (7.0/-/-) | | ¢ į | 1 |
| Margin (General) | Not ! | | |
| (6.0/3.0/3.0) | applicable | | 1 |
| Margin (NUREG-0588, | 1 1 | | : |
| Cat. I) (-/3.2/-) | NAT : | | : |
| 1. Temperature (+15°F) | 1 amburger | | |
| 2. Pressure (+10%, | · appresser : | | 1.1 |
| 3. Radiation | 1 | | |
| (not required) | | | |
| 4. Time (+10%, +1 hour | 1 | | 1 |
| + function time minimum) | 1 | | : |

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| NRC REQUIREMENTS WITH SECTION REFERENCE (DOR/0588-I/0588-II) | LICENSEE SUBMITTAL | QUALIFICATION | DEFICIENCY (X OR NOTE NO.) |
|---|-----------------------|----------------|----------------------------------|
| ACCIDENT CONDITIONS | | 1 | |
| LOCA/MSLB/HELB/Uncontrolled (4.1, 4.2, 4.3.1, 4.3.3/ 1.1, 1.2, 1.5/1.1, 1.2, 1.5) | NA. | N.A. | |
| Radiation Type | Jamma | Gamma | 1 |
| Radiation Dose (rd) (4.1.2/1.4/1.4) | 1.5×108 | 2.04 × 108 rol | |
| Radiation Dose Rate (rd/hr) Radiation Qual. Method (5.3.1/-/-) | 2.1×104 | 9.1 ×10 5rd/h. | |
| Proximity to Concentrated Radiation (4.1.2/1.4.6/1.4.6) | NA. | N.A. | |
| Equipment Susceptible to Beta Radiation (4.1.2/-/-) | NO | Nos staled | |
| Radiation Dose (Normal + Accident) (4.1.2/-/-) | M.6XIONd | 2.04 × 10 8 pd | |
| Plateout Dose Considered (-/1.48/1.48) | No | Notstall | |
| Gamma + Beta Dose (rd) (4.1.2/1.4.7/1.4.7) | What sailed | Natstated | |

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NRC REQUIREMENTS DEFICIENCY WITH SECTION REFERENCE LICENSEE QUALIFICATION (X OR (DOR/0588-1/0588-11) NOTE No.) SUBMITTAL DOCUMENTATION ENVIRONMENTAL PROFILE OF ACCIDENT CONDITIONS 28.6°F/sec: 170×/sec. 6 pri/sec: >20 pri/sec. Rate of Temp./Press. Increase 280/60/100/27h: 340/80-100/3h. Peak: °F/psig/RH/Time Decrease To: °F/psig/RH/Time :250/00/10/07/1: 320/67/10 / 3h : 125/20/m/186h: 330/ 40/100/25h Decrease To: °F/psig/RH/Time 250/25/10/48h. Decrease To: °F/psig/RH/Time applicate not applicable Equipment Surface Temperature (MSLB) (-/1.2.5.C, 2.2.6/1.2.5.C, 2.2.6) Simultaneous teat Test Spray Qualification Method (5.3.2/1.3, 2.2.8/1.3, 2.2.8) 18 R - 420 Bound Spray Composition 311.89 - H3 BO3 150 9 - Nao H 285.89 - Na2 5203 12000-3000 (4.1.4/1.3, 2.2.8/ (Ppm Biron) 1.3, 2.2.8) Na0H-0+8-10: Spray Density (gpm/ft²) 0.15gpm/422 NotSTATED Spray Duration Not STATED : 5 days Not tested Submergence Duration Not Appliceble. (4.1.3/2.2.5/2.2.5)chedead - not Not In-Leakage Considered detected (5.2.6, 5.3.2/-/-) NAT lested Nat applicable Time to Submergence Nat applicable Dust Environment Nat states (-/2.2.11/2.2.11)



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Franklin Research Center A Division of The Franklin Institute 20th and Pace Streets, Phila, Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 69

INSTALLED TMI LESSONS LEARNED IMPLEMENTATION EQUIPMENT SUMMARY

NRC requested an evaluation of the environmental qualification of safetyrelated electrical equipment located in harsh environments required for TMI Lessons Learned Implementation. The objective is to evaluate qualification documentation of equipment within the scope of IE Bulletin 79-01B, Supplement 3 (item 2), in accordance with criteria established by the NRC (see Section 2 of this report) in a manner identical to the evaluation of all other safetyrelated electrical equipment. The scope of this review is limited to TMI Action Plan equipment associated with specific sections of NUREG-0737 which have an installation implementation date of January 1, 1981 (sections are identified below). Where applicable, a review is to be performed on installed equipment with implementation dates after January 1, 1981 if adequately identified by the licensee.

This plant is a PWR X, BWR The NSSS Vendor is Westinghouse (W) X, Babcox & Wilcox (B&W) Combustion Engineering (CE), General Electric (GE)

With respect to this equipment item, it is noted (applicable section checked):

- The Licensee does not provide adequate information with respect to identification of TMI Action Plan equipment installed as of 1/1/81.
- The Licensee has not provided the correlation of this equipment item with the specific sections of NUREG-0737. [The correlation is needed to ensure that all items are included in the review, e.g., if a transmitter is identified as a TMI Action Plan item, are the cable and the terminal blocks associated with the device also identified?]
- ____ The Licensee has not provided the approximate installation date for the TMI Action Plan equipment items so that the appropriate qualification criteria (NUREG-0588 or DOR Guidelines) can be used in the EEQ evaluation.
- The Licensee has provided a standard Owners' Group position with respect to a NUREG-0737 technical area.
- The Licensee has requested extensions of implementation dates.
- The Licensee has stated that this equipment item is associated with the following section of NUREG-0737. (This list of applicable NUREG-0737 sections has been identified by NRC as sections within the scope of this review):
 - ____ II.B.3 (ALL/1-1-81) Post-Accident Sampling Capability of Reactor Coolant and Containment
 - X II.D.3 (ALL/1-1-81) Direct Indication of Relief and Safety Valve Position



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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 65

Equipment Item No. 65 (TMI Action Plan Item II.D-3)
Linear Variable Differential Transformer Limit Switch Located Inside
Containment (Area #1)
Schaevitz Model 500-HCA
Position Indication for the Pressurizer Safety and Relief Valves
(Plant ID Not Stated)
Licensee Reference 2041
Required Operating Time: Not specified
TER Checksheet No. 65
Licensee Submittal: Page 1 [65]; FPC SCEW 74

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend)

R, T, QI, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None,

Not stated, Not applicable

LISTING OF APPLICABLE CHECKSHEETS:

Contents

Checksheet Page No.

la

Equipment Item

Installed TMI Lessons Learned Implementation Equipment Summary

Maintenance id Replacement Schedule Summary

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6a, 64

34, 36, 34, 34

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|---|---|-----------------|
| QUIPMENT ENVIRONMENTAL QUALIFIC | CATION REVIEW OF EQUIPMENT ITER | M NO. <u>65</u> |
| SUMMARY OF LICENSEE RESPONSES TO THE | NRC SER - ONLY CHECKED ITEMS ARE A | PPLICABLE: |
| The Licensee (has/has not) provid | ed a response to the SER concerns. | |
| The Licensee (has/has not) specif qualified and/or will function wh environmental service conditions. | ically stated that the equipment i en exposed to the applicable DBE | S |
| The Licensee has presented inform outstanding qualification deficie | ation which shows there are no ncies. | |
| X The Licensee (has/has not) propos item whose qualification has not | ed a corrective action for this eq been fully established. | uipment |
| Justification for interim ope Licensee for this equipment i | ration (has/has not) been provided tem. | by the |
| X Corrective action specified b | y the Licensee: | |
| | h qualified equipment e submergence level eent from radiation source dditional (testing/analysis) mild environment equipment in progress |) |
| The Licensee has provided oth that can be construed as a ba operation. | er information for this equipment sis for justification for interim | item |
| X The Licensee (has/has not) pr corrective action. (Schedule action June 30,1982 | ovided a schedule for the proposed for accomplishing the corrective |) |
| The Licensee states that the equi and/or should be exempted from en | pment item does not require qualif vironmental qualification. | ication |
| DESIGNATION OF RESULTANT NRC QUALIFIC - CIRCLED ITEM ONLY: (See Section 3 | CATION EVALUATION CATEGORY BASED ON of this TER for Legend) | REVIEW |
| I.a Qualified I.D Modification II.a Qualification Not Established II.b Not Qualified | II.c Qualified Life Deficiency III.a Exempt III.b Not in Scope IV Documentation Not Availab | le |
| | | |

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 65

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

NRC REQUIREMENTS

DESIGNATION: X = DEFICIENCY

Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

NRC QUALIFICATION CATEGORY

DESIGNATION: X = CATEGORY

| I.a | Equipment Qualified | |
|-------|--|----|
| I.b | Equipment Qualification Pending Modification | _X |
| II.a | Equipment Qualification Not Established | |
| II.b | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life | |
| | or Replacement Schedule Justified | |
| III.a | Equipment Exempt From Qualification | |
| III.D | Equipment Not in the Scope of the Qualification Review | |
| VI | Documentation Not Made Available | |
| | | |

See page 5f (conclusions)

Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

Page 3a

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 65

LICENSEE RESPONSE TO NRC SER

Attachment: TMI Equipment Installed and Operable

Pressurizer Safety Valve Position Indication - The Environmental Qualification Report is included.

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NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 65

Checksheets 5a Chru 5f have been removed due to the

proprietary nature of information contained therein.

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NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 65

INSTALLED TMI LESSONS LEARNED IMPLEMENTATION EQUIPMENT SUMMARY

NRC requested an evaluation of the environmental qualification of safetyrelated electrical equipment located in harsh environments required for TMI Lessons Learned Implementation. The objective is to evaluate qualification documentation of equipment within the scope of IE Bulletin 79-01B, Supplement 3 (item 2), in accordance with criteria established by the NRC (see Section 2 of this report) in a manner identical to the evaluation of all other safetyrelated electrical equipment. The scope of this review is limited to TMI Action Plan equipment associated with specific sections of NUREG-0737 which have an installation implementation date of January 1, 1981 (sections are identified below). Where applicable, a review is to be performed on installed equipment with implementation dates after January 1, 1981 if adequately identified by the licensee.

This plant is a PWR X, BWR . The NSSS Vendor is Westinghouse (W) X, Babcox & Wilcox (B&W) ____, Combustion Engineering (CE) ___, General Electric (GE) ____.

With respect to this equipment item, it is noted (applicable section checked):

____ The Licensee does not provide adequate information with respect to identification of TMI Action Plan equipment installed as of 1/1/81.

The Licensee has not provided the correlation of this equipment item with the specific sections of NUREG-0737. [The correlation is needed to ensure that all items are included in the review, e.g., if a transmitter is identified as a TMI Action Plan item, are the cable and the terminal blocks associated with the device also identified?]

The Licensee has not provided the approximate installation date for the TMI Action Plan equipment items so that the appropriate qualification criteria (NUREG-0588 or DOR Guidelines) can be used in the EEQ evaluation.

The Licensee has provided a standard Owners' Group position with respect to a NUREG-0737 technical area.

The Licensee has requested extensions of implementation dates.

X The Licensee has stated that this equipment item is associated with the following section of NUREG-0737. (This list of applicable NUREG-0737 sections has been identified by NRC as sections within the scope of this review):

____ II.B.3 (ALL/1-1-81) Post-Accident Sampling Capability of Reactor Coolant and Containment

X II.D.3 (ALL/1-1-81) Direct Indication of Relief and Safety Valve Position

Page 60 Franklin Research Center A Division of The Franklin Institute 20th and Race Streets. Phila. Pa 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 66

Equipment Item No. 66 (TMI Action Plan Item II.B.1) Solenoid Valves Located Inside Containment (Area #1) Valcor Engineering Corp., Model Not Stated Reactor Vessel Head Vent (Plant ID Not Stated) Licensee References 1547, 1568, 1569, 1801, 1835, 2796, 2797, 2798, 2799, 2800, and 2801 Required Operating Time: Long term TER Checksheet No. 66 Licensee Submittal: Page 1 [65]; FRC SCEW 66

(See Section 3 of this TER for Legend) R, T, QT, RT, P, H, CS, A, S, (R), M, I, QM, RPN, EXN, SEN, QI, RPS, None, Not stated, (Not applicable) LISTING OF APPLICABLE CHECKSHEETS: Checksheet Page No. Contents la Equipment Item Summary of Licensee Responses to the NRC SER 1b Equipment Environmental Qualification Summary Forms 2 36, 36, 36, 36, 38 Licensee Response to NRC SER 44, 46, 46, 48, 44, 44, 45 System Consideration Review 5a, 5b, 5c, 5d, 5e, 5f, Equipment Environmental Qualification Review 54, 34, 34, 35 6a, 6b Installed TMI Lessons Learned Implementation Equipment Summary 76, 76, 76 Maintenance and Replacement Schedule Summary

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY:

| | NRC Contract No. N |
|---|--------------------|
| Franklin Research Center | FRC Project No. C5 |
| A Division of The Franklin Institute | FRC Assignment N |
| 20th and Race Streets. Phila. Pa 19103 (215) 448-1000 | FRC Task No. 4. |
| | |

NRC-03-79-118 257 0.13 4

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 66

SUMMARY OF LICENSEE RESPONSES TO THE NRC SER - ONLY CHECKED ITEMS ARE APPLICABLE: The Licensee (has/has not) provided a response to the SER concerns. The Licensee (has/has not) specifically stated that the equipment is qualified and/or will function when exposed to the applicable DBE environmental service conditions. The Licensee has presented information which shows there are no outstanding gualification deficiencies. The Licensee (has/has not) proposed a corrective action for this equipment item whose qualification has not been fully established. Justification for interim operation (has/has not) been provided by the Licensee for this equipment item. Corrective action specified by the Licensee: Equipment replacement with gualified equipment Equipment modification Equipment relocation above submergence level Relocate or shield equipment from radiation source Verify qualification by additional (testing/analysis) Equipment relocation to a mild environment Qualification testing of equipment in progress Other (The Licensee has provided other information for this equipment item that can be construed as a basis for justification for interim operation. The Licensee (has/has not) provided a schedule for the proposed corrective action. (Schedule for accomplishing the corrective action ..) The Licensee states that the equipment item does not require qualification and/or should be exempted from environmental qualification. DESIGNATION OF RESULTANT NRC QUALIFICATION EVALUATION CATEGORY BASED ON REVIEW - CIRCLED ITEM ONLY: (See Section 3 of this TER for Legend) I.a Qualified II.c Qualified Life Deficiency I.b Modification III.a Exempt (II.a) Qualification Not Established III.b Not in Scope II.b Not Qualified IV Documentation Not Available

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NRC Contract No. NRC-03-79-118

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EQUIPMENT F RONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 66

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

DESIGNATION: X = DEFICIENCY NRC REQUIREMENTS Documented Evidence of Qualification Adequate Adequate Similarity Between Equipment and Test Specimen Established X Aging Degradation Evaluated Adequately Qualified Life or Replacement Schedule Established (If Required) Program Established to Identify Aging Degradation Criteria Regarding Aging Simulation Satisfied (If Required) Criteria Regarding Temperature/Pressure Exposure: o Peak Temperature Adequate o Peak Pressure Adequate o Duration Adequate o Required Profile Enveloped Adequately o Steam Exposure (If Required) Adequate Criteria Regarding Spray Satisfied Criteria Regarding Submergence Satisfied Criteria Regarding Radiation Satisfied Criteria Regarding Test Sequence Satisfied Criteria Regarding Test Failures or Severe Anomalies (If Any) Satisfied Criteria Regarding Functional Testing Satisfied Criteria Regarding Instrument Accuracy Satisfied Test Duration Margin (1 hour + Function Time) Satisfied Criteria Regarding Margins Satisfied (NUREG-0588, Cat. I)

DESIGNATION: X = CATEGORY

NRC QUALIFICATION CATEGORY I.a Equipment Qualified I.b Equipment Qualification Pending Modification Equipment Qualification Not Established II.a Equipment Not Qualified II.D II.c Equipment Satisfies All Requirements Except Qualified Life or Replacement Schedule Justified Equipment Exempt From Qualification III.a III.b Equipment Not in the Scope of the Qualification Review

IV Documentation Not Made Available A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. <u>454</u>

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 66

Checksheets 5a Chru 5f have been removed due to the

proprietary nature of information contained therein.

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NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 954

EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 66

INSTALLED TMI LESSONS LEARNED IMPLEMENTATION EQUIPMENT SUMMARY

NRC requested an evaluation of the environmental qualification of safetyrelated electrical equipment located in harsh environments required for TMI Lessons Learned Implementation. The objective is to evaluate qualification documentation of equipment within the scope of IE Bulletin 79-01B, Supplement 3 (item 2), in accordance with criteria established by the NRC (see Section 2 of this report) in a manner identical to the evaluation of all other safetyrelated electrical equipment. The scope of this review is limited to TMI Action Plan equipment associated with specific sections of NUREG-0737 which have an installation implementation date of January 1, 1981 (sections are identified below). Where applicable, a review is to be performed on installed equipment with implementation dates after January 1, 1981 if adequately identified by the licensee.

This plant is a PWR X, BWR The NSSS Vendor is Westinghouse (W) X, Babcox & Wilcox (B&W), Combustion Engineering (CE), General Electric (GE).

With respect to this equipment item, it is noted (applicable section checked):

The Licensee does not provide adequate information with respect to identification of TMI Action Plan equipment installed as of 1/1/81.

The Licensee has not provided the correlation of this equipment item with the specific sections of NUREG-0737. [The correlation is needed to ensure that all items are included in the review, e.g., if a transmitter is identified as a TMI Action Plan item, are the cable and the terminal blocks associated with the device also identified?]

- The Licensee has not provided the approximate installation date for the TMI Action Plan equipment items so that the appropriate qualification criteria REG-0588 or DOR Guidelines) can be used in the EEQ evaluation.
- The Licersee has provided a standard Owners' Group position with respect to a NUREG-0737 technical area.
- The Licensee has requested extensions of implementation dates.
- X The Licensee has stated that this equipment item is associated with the following section of NUREG-0737. (This list of applicable NUREG-0737 sections has been identified by NRC as sections within the scope of this review):
 - II.B.3 (ALL/1-1-81) Post-Accident Sampling Capability of Reactor Coolant and Containment
 - _ II.D.3 (ALL/1-1-81) Direct Indication of Relief and Safety Valve Position

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20th and Race Streets. Phila . Pa 19103 (215) 448-1000 EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 66 II.E.1.2 (PWR/1-1-81) Auxiliary Feedwater System Automatic Initiation and Flow Indication II.E.3.1 (PWR/1-1-81) Emergency Power Supply for Pressurizer Heaters (Safety-Grade Interfaces II.E.4.1 (ALL/7-1-81) Dedicated Hydrogen Penetrations II.E.4.2 (ALL/1-1-81) Containment Isolation Dependability II.F.2 (PWR/1-1-81) Instrumentation for Detection of Inadequate Core Cooling II.G.1 (PWR/1-1-81) Emergency Power for Pressurizer Equipment (Safety-Grade Interfaces) II.K.2.10 (PWR/B&W/7-1-81) Safety-Grade Anticipatory Reactor Trip II.K.3.9 (PWR/W/1-1-81) PID Controller Modification (If Hardware Change Involved) II.K.3.12 (PWR/W/1-1-81) Anticipatory Reactor Trip upon Turbine Trip II.K.3.13 (BWR/GE/7-1-81) Separation of HPCI and RCIC Initiation Signals II.K.3.15 (BWR/GE/7-1-81) Prevention of Spurious Isolation of HPCI and RCIC Systems II.K.3.19 (BWR/GE/7-1-81) Interlock on Recirculation Pump Loop II.K.3.21 (BWR/GE/7-1-81) Restart of Core Spray and LPCI Systems (If Hardware Changed Out) II.K.3.27 (BWR/GE/7-1-81) Provide Common Reference Level for Vessel Level Instrumentation (If Hardware Changed Out) X I.B.I



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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 47

Equipment Item No. 67 Pressure Transmitters Located in Auxiliary Building ITT-Barton Model 332 Containment Pressure Transmitters (Plant ID Not Stated) Licensee Reference 567 Required Operating Time: Long term TER Checksheet No. 67 Reference 59, Section 4.5.2.1 Licensee Submittal: Page 13 [62]; Table 3, Page 7 [1]; FRC SCEW 46

DESIGNATION FOR DEFICIENCY IDENTIFIED BY THE NRC SER - CIRCLED ITEM(S) ONLY: (See Section 3 of this TER for Legend) R, T, QT, RT, P, H, CS, A, S, ((R)), M, I, QM, RPN, EXN, SEN, (QI) RPS, None, Not stated, Not applicable LISTING OF APPLICABLE CHECKSHEETS: Checksheet Page No. Contents la Equipment Item Summary of Licensee Responses to the NRC SER 1b Equipment Environmental Qualification Summary Forms 2 3a, 36, 36, 36 Licensee Response to NRC SER 4, 40, 46, 46, 4d, 4e, 4E System Consideration Review 54, 50, 56, 58, 96, 95, Equipment Environmental Qualification Review 30, 30, 54, 50 64, ap Installed TMI Lessons Learned Implementation Equipment Summary 76, 76, 70 Maintenance and Replacement Schedule Summary
| A Division of The Franklin Institute 20th and Race Streets. Phila Pa 19103 (215) 448-1000 | NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No | Page Ib | |
|---|---|------------|--|
| EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 47 | | | |
| | | | |
| SUMMARY OF LICENSEE RESPONSES TO THE | NRC SER - ONLY CHECKED ITEMS ARE APPL | ICABLE: | |
| X The Licensee (has/has not) provid | ed a response to the SER concerns. | | |
| The Licensee (has/has not) specif qualified and/or will function wh environmental service conditions. | ically stated that the equipment is en exposed to the applicable DBE | | |
| The Licensee has presented inform outstanding qualification deficie | ation which shows there are no ncies. | | |
| X The Licensee (has/h as not) propos item whose qualification has not | ed a corrective action for this equip been fully established. | ment | |
| Justification for interim ope Licensee for this equipment i | ration (has/has not) been provided by tem. | the | |
| X Corrective action specified b | y the Licensee: | | |
| <u>X</u> Equipment replacement wit Equipment modification | h qualified equipment | | |
| Equipment relocation abov | e submergence level | - 11 위험 | |
| Relocate or shield equipm | ent from radiation source | | |
| Equipment relocation to a | mild environment | | |
| Qualification testing of | Qualification testing of equipment in progress | | |
| Other () | | | |
| The Licensee has provided oth that can be construed as a ba operation. | er information for this equipment ite sis for justification for interim | m | |
| X The Licensee (has/ source) pr corrective action. (Schedule action June 30, 1982 | ovided a schedule for the proposed for accomplishing the corrective) | | |
| The Licensee states that the equi and/or should be exempted from en | pment item does not require qualifica vironmental qualification. | tion | |
| DESIGNATION OF RESULTANT NRC QUALIFIC | ATION EVALUATION CATEGORY BASED ON RE | VIEW | |
| - CIRCLED ITEM ONLY: (See Section 3 | of this TER for Legend) | | |
| I.a Qualified (I.b) Modification | II.c Qualified Life Deficiency III.a Exempt | | |
| II.a Qualification Not Established | III.b Not in Scope | | |
| II.D NOC QUALIFIED | Ty Documentation Not Available | | |

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 62

EQUIPMENT ENVIRONMENTAL QUALIFICATION SUMMARY FORM

NRC REQUIREMENTS

DESIGNATION: X = DEFICIENCY

| Documented Evidence of Qualification Adequate |
|---|
| Adequate Similarity Between Equipment and Test Specimen Established X |
| Aging Degradation Evaluated Adequately |
| Qualified Life or Replacement Schedule Established (If Required) |
| Program Established to Identify Aging Degradation |
| Criteria Regarding Joing Simulation Satisfied (If Reguired) |
| Criteria Regarding Tengerature /Pressure Exposure: |
| Criteria Regarding resperature Adoquate |
| o Peak Temperature Adequate |
| o Peak Pressure Adequate |
| o Duration Adequate |
| o Required Profile Enveloped Adequately |
| o Steam Exposure (If Required) Adequate |
| Criteria Regarding Spray Satisfied |
| Criteria Regarding Submergence Satisfied |
| Criteria Regarding Radiation Satisfied |
| Criteria Regarding Test Sequence Tatisfied |
| Criteria Regarding Test Failures or Severe Anomalies |
| (If Any) Satisfied |
| Criteria Regarding Functional Testing Satisfied |
| Criteria Regarding Instrument Accurecy Satisfied |
| Test Durstion Margin () wour + Rungrion Time) Satisfied |
| Test burderon Margin (1 hour + runderon fille) Satisfied |
| Criteria Regarding Margins Satisfied (NUREG-0588, Cat. 1) |
| |

NRC QUALIFICATION CATEGORY

| I.a | Equipment Qualified | |
|-------|--|---|
| I.b | Equipment Qualification Pending Modification | × |
| II.a | Equipment Qualification Not Established | - |
| II.b | Equipment Not Qualified | |
| II.c | Equipment Satisfies All Requirements Except Qualified Life | |
| | or Replacement Schedule Justified | |
| III.a | Equipment Exempt From Qualification | |
| III.b | Equipment Not in the Scope of the Qualification Review | |
| VI | Documentation Not Made Available | |
| | | |

This equipment item was previously evaluated in Reference 59. See page 1A Equipment Item description.

DESIGNATION: X = CATEGORY A Division of The Franklin Institute 20th and Race Streets. Phila. Pa. 19103 (215) 448-1000 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

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EQUIPMENT ENVIRONMENTAL QUALIFICATION REVIEW OF EQUIPMENT ITEM NO. 67

LICENSEE RESPONSE TO NRC SER

Item 4.6.8 addresses the containment pressure transmitters located in the intermediate building. The five transmitters being replaced are those located in the auxiliary building, where the potential for higher radiation levels as a result of post-LOCA sump recirculation dictated their replacement. The intermediate building will not experience a harsh environment for an HELB inside containment, which is the only time these transmitters are required to operate. Although they would see a harsh environment as the result of an HELB in the intermediate building, they have no function to perform during such an event. It is thus considered that these two transmitters need only function in a "mild" environment.

5. CONCLUSIONS

The tabulations in Section 4.2 represent a summary of the results of the equipment environmental qualification (EEQ) assessment conducted in accordance with the methodology presented in Section 3. The evaluations are based on the available qualification documentation provided by the Licensee, complemented in several cases by other relevant technical information. The major qualification deficiencies that have been identified and the results of the evaluation are shown in the Equipment Environmental Qualification Summary Forms (Tables 4-1, 4-2, 4-3, and 4-4).

Although Sections 4.3, 4.4, and Appendix C of this report present a detailed evaluation of (1) the Licensee's qualification methodology, (2) the equipment environmental qualification of each equipment item, and (3) the Licensee's response to the NRC SER, it is appropriate to highlight for the Licensee and the NRC certain conclusions and concerns reached as a result of the review which require special attention. These concerns are summarized below.

With regard to Equipment Item No. 17 (MOV-878A, -878C), the Licensee has stated that these values (SI to RCS hot legs) are locked closed with power removed and are therefore exempt from qualification.

It is apparent that the FSAR assumes availability of hot leg injection points. In fact, it appears that, with both hot leg injection values disabled closed and a broken cold leg injection line, the system is reduced from three pumps discharging to four lines to one pump discharging to one line (the other two pumps pumping out the break). At this point, a single-active failure to the appropriate pump would cause all safety injection flow to be interrupted until certain motor-operated values (such as MOV-871A and 871B) could be realigned to redirect the discharge of one of the operable pumps from the broken cold leg line to the intact line.

It is not apparent why values 878A and 878C have been locked closed. It is possible that plant modifications may have been made after the FSAR was written that justify the Licensee's position. The Licensee should either provide further clarification on this issue or qualify the subject value actuators for the post-accident environment.

With regard to Equipment Item No. 57 (reactor coolant pump trip breakers), the evaluation presented in TER-C5257-178, Section 4.6.2 and Appendix E.2, concluded that this equipment should be environmentally qualified to remain functional during a main steam line break (MSLB) or main feedwater line break (MFLB) in the turbine building. The Licensee did not adequately respond to this concern. It is highly desirable to retain a normal cooldown mode in this situation, and the Licensee should not rely on natural circulation cooling. This equipment should remain categorized as requiring environmental qualification.

Finally, the Licensee stated in its response [62] to the NRC SER: .

"The attached information responds to all open items identified in the SER and TER, except for deferred 'mild environment' and 'IMI-related' equipment.

For certain items, qualification information is still being developed. In those cases, a commitment is made to complete the evaluation/ qualification of this equipment by June 30, 1982. Rationale for acceptability of the use of the installed equipment in the interim is also provided. It must be pointed out, however, that the June 30, 1982 date may not be achievable for all modifications. Equipment procurement and delivery schedules, testing requirements, and installation days (especially as related to scheduled refueling shutdowns) may require a delay in the installation of certain modifications. Another major source of delay results from new issues, which we consider go beyond the DOR Guidelines, brought up in the SER/TER. These issues include the additional containment temperature margin requirements, the dose rate concern presented in Appendix H of the TER, and the complete resolution of the aging/qualified life concerns. Specific comments are provided in the attachments to this letter. Finally, a resolution of disagreements between RG&E and FRC/NRC relative to system operational considerations (see Appendix E of the TER) is required."

Franklin Research Center

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6. REFERENCES

The references listed in this section of the report were used to develop the Equipment Environmental Qualification evaluation for this plant. The references have been separated into two lists: (1) Plant-Specific References and (2) Plant Generic References. All non-generic documents are listed on the "Plant-Specific References" list. All qualification documents that could be applicable to equipment installed in several plants were listed on the "Plant Generic References" list. These documents include topical reports, test reports, component and material analyses, etc. cited by the Licensee as evidence of qualification in accordance with the documentation reference instructions established by IE Bulletin 79-01B. Since these documents were compiled by a computer data base, the citation numbering was computer generated and the same document has the same generic reference number in all Technical Evaluation Reports prepared under this equipment qualification program.

Throughout the text of the report, references are designated by a bracketed number; the reference numbers are not presented in sequential order.



PLANT-SPECIFIC REFERENCES

 J. E. Maier Letter to D. G. Eisenhut, NRC. Subject: Transmittal of RG&E Report on Environmental Qualification of Electrical Equipment of R. E. Ginna Power Plant Rochester Gas & Electric, 31-Oct-80

- O. R. Martins Specifications for Standby AFW Pumps Gilbert Associates, 20-Sep-74 SP-520-044666-000
- Preliminary Specification for Electric Motors To Be Supplied with Standby AFW Pumps Gilbert Associates, 06-Sep-74 P-SP-711-044666-000
- Specifications for Large Motors Gilbert Associates, 29-Mar-67 SP-5201, Rev. 5

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- 5. Specification for Heating, Ventilating, and Cooling Systems Gilbert Associates, 05-Apr-67 SP-5342
- 6. Specifications for Emergency Diesel Engine-Generator Sets Gilbert Associates, 25-Nov-66 RO-2239
- Specifications for Motor Driven Auxiliary Feedwater Pumps Gilbert Associates, 22-Dec-66 RO-2267
- Specifications for D.C. Power and Control Batteries Gilbert Associates, 16-Jun-67 RO-2400, Revised
- 9. Specifications for Cable Insulation, Sections 3.8 and 4.3.1 IPCEA, 00-Aug-74 S-61-402

- J. B. Gardner Memo, Subject: Tests on Kerite Cables Kerite Co., 22-Jul-68
- 11. NEMA Standards for Low Voltage Power Circe Breakers NEMA, 14-Feb-75 SG 3-1975
- 12. Specifications for Motor Operated Valves Westinghouse, 23-May-66 G-676258
- Specifications for Control Valves Westinghouse, 08-Mar-66 G-676270

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- 14. Specifications for Auxiliary Pumps Westinghouse, 29-Jul-66 G-676370
- 15. Specification for Auxiliary Pump Motors Westinghouse, 23-Nov-66 G-676427
- 16. A. P. Colaiaco Letter to E. F. Hoellen. Subject: Terminal Blocks and Switchgear; w. h Attachment Westinghouse, 6 -Feb-78
- Specifications for Solenoid Valves Copes-Vulcan
- 18. Specification Sheet for Solenoid Valves R. G. Laurence Co. 1100 & 1200
- Vendor Data Sheet for Solenoid Valves Versa Valves
- 20. S. A. Hunt Specification for Containment Structure Electrical Penetration Gilbert Associates, 09-Aug-74 SP-504-044666-000
- Technical Proposal for the Electrical Penetration for the Ginna Station Containment Structure Westinghouse, 04-Sep-74 Proprietary

- Vendor Data, Gould Batteries Gould, Inc.
- Specification Sheet on Foxboro Transmitters Westinghouse, 05-Dec-67
- 24. Technical Manual: Installation and Operation, Differential Pressure Indicating Switches ITT Barton, 1975 505-4(A)
- 25. Specification Sheets: Nuclear Sleeves Raychem Corp. WCSF-N
- 26. L. D. White, Jr. Letter to R. A. Purple, NRC. Subject: Valves in Containment Flooding Rochester Gas & Electric, 16-Jun-75
- 27. O. R. Martins Design Criteria: Standby Auxiliary Feedwater System; Revision 4 Gilbert Associates, 22-Oct-76 WO 04-4594-011,R
- 28. L. D. White, Jr. Letter to B. H. Grier, NRC. Subject: Environmental Qualification of Stem Mounted Limit Switches on Containment Isolation Valves Rochester Gas & Electric, 16-Jan-79
- 29. Test Reports: Test Data for Coleman and Rome Cable Coleman Cable Co., 28-May-68 IPCEA S-19-81
- 30. R. T. Davis Memo to G. Daniels. Subject: Failure Rates of Electrical Components Rochester Gas & Electric, 06-May-80
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APPENDIX A - ENVIRONMENTAL SERVICE CONDITIONS

This appendix contains a summary of the information concerning expected environmental service conditions in various locations within the plant (see Figure A-1), as provided in Reference 1. Based on these considerations, each equipment item was evaluated with respect to the environmental service conditions presented in this appendix.

Environment 1 - Inside Reactor Containment

Normal Operation

Temperature Pressure Humidity Radiation 60-120°F O psig 50% (nominal) < 1 rd/h (can be higher or lower near specific equipment items)

Accident Conditions

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For PWR plants, the Guidelines (Section 4) state that the environmental service conditions inside containment for the loss-of-coolant accident (LOCA) should be established by the Licensee based on the FSAR analysis. In addition, for plants equipped with automatic containment spray systems not subject to single component failure or delayed initiation, the Guidelines state that equipment qualified for the LOCA environment is also considered qualified for the postulated main-steam-line-break accident (MSLB). The design of the Ginna plant satisfies these criteria. The environmental conditions resulting from a feedline break are less severe than those from the MSLB.

The environmental parameters used for the assessment of qualification of equipment inside containment are:

| Temperature and Pressure Humidity | Figure A=2* |
|--------------------------------------|---|
| Spray | Solution of boric acid (2000 to 3000 |
| | ppm of boron) plus sodium hydroxide in water. Solution pH between 8 and 10. |

*The calculated "worst-case" peak pressure is less than 53 psig and falls to 0 at about 8.3 hours. The duration of the temperature profile was extended to include the data provided in Reference 74 (see discussion on Page A-2).

Integrated Radiation Dose in Atmosphere Flooded Depth [62] Figure A-3 242 ft 8 in elev.

In Reference 74, the Licensee transmitted to the NRC an updated evaluation of the pressure and temperature conditions which would result from a LOCA or steam line break inside containment. The Licensee recommended that the LOCA temperature be revised to show a value of 250°F between 10,000 seconds and 20,000 seconds rather than the values shown on Figure A-2. Beyond 20,000 seconds, the Licensee recommended a temperature of less than 100°F. The Licensee also provided its results of the main steam line break analysis inside containment [74]; Figures A-4, A-5, A-6, and A-7 show the results of the analysis contained in Reference 74. The Licensee stated the following:

"We conclude that the temperature resulting from a steam line break in containment may exceed the Ginna design basis temperature profile, but that this is of no consequence due to the short duration of this exceedance and may therefore be ignored. This conclusion is based on NRC guidance provided in the Division of Operating Reactors (DOR) Guidelines which in turn is based, for example, on the short duration of the temperature spike, lower heat transfer coefficient, and the evaluation of the steam lines relative to equipment. Thus, we conclude that the Ginna design basis temperature profile, as revised based on LOCA result discussed above, remains valid."

Environment 2 - Auxiliary Building

Normal Operation

| Temperature | 50-104°F |
|---------------------|-----------------------------|
| Pressure | 0 psig |
| Humidity | 60% (nominal) |
| Radiation Dose Rate | < 10 mR/h (areas near RHR |
| | piping, < 100 mR/h when RHR |

Accident Conditions

Temperature Pressure Humidity 50-104°F (122°F near motors) 0 psig 60% (nominal)

system is in operation)

Radiation

Operating Floor (271 ft elev.) Near Bus 14 and MCC 1C & 1L: 100 rd Other Areas: < 50 rd Intermediate Floor (253 ft elev.) Near Bus 16 and MCC 1D & 1M: 900 rd Other Areas: < 500 rd Basement Floor (236 ft elev.) Near CS, RHR, and SI pumps and associated piping: 2.8 Mrd Other areas: < 0.01 Mrd

Environment 3 - Intermediate Building and Cable Tunnel

Normal Operation

| Temperature | 50-104°F |
|---------------------|-------------------------------|
| Pressure | O psig 60% (nominal) |
| Radiation Dose Rate | < 1 mR/h (higher near reactor |
| | coolant sampling lines) |

Accident Conditions

Based Upon HELB or MSLB

Temperature

Pressure

Humidity Flooded Depth 215°F for 30 min; then 104°F
within 3 h and indefinitely
thereafter
0.8 psig for 30 min; then 0 psig
within 3 h and indefinitely
thereafter
100% indefinitely
0 ft

Based Upon LOCA Conditions

Temperature

Pressure Humidity Radiation Flooded Depth 115°F (estimated) near large motors and FW and SL piping; 104°F in open areas 0 psig 100% Negligible 0 ft



Environment 4 - Diesel Generator Rooms

Normal Operation

| Temperature | 60-104°F |
|---------------------|---------------|
| Pressure | 0 psig |
| Humidity | 60% (nominal) |
| Radiation Dose Rate | Negligible |
| | |

Accident Conditions

| Temperature | < 104°F |
|---------------|--|
| Pressure | 0 psig |
| Humidity | 90% (estimated) |
| Radiation | Negligible |
| Flooded Depth | 0 ft for both rooms simultaneously (Flooding of one room to |
| | approx, 1-ft depth could occur) |

Environment 5 - Screen House

Normal Operation

| Temperature | 50-104°F |
|---------------------|---------------|
| Pressure | 0 psig |
| Humidity | 60% (nominal) |
| Radiation Dose Rate | Negligible |

Accident Conditions

| Temperature | < 104°F |
|---------------|---------------|
| Pressure | 0 psig |
| Humidity | 60% (nominal) |
| Radiation | Negligible |
| Flooded Depth | 1.5 ft |

Environment 6 - Auxiliary Building Addition

Normal Operation

| Temperature | 60-120°F |
|---------------------|---------------|
| Pressure | 0 psig |
| Humidity | 60% (nominal) |
| Radiation Dose Rate | Negligible |



Accident Conditions

| Temperature | 60-120°F | |
|---------------|---------------|--|
| Pressure | 0 psig | |
| Humidity | 60% (nominal) | |
| Radiation | Negligible | |
| flooded Depth | Approx. 2 ft | |

Environment 7 - Turbine Building

Normal Operation

| Temperature | 50-104°F |
|---------------------|---------------|
| Pressure | 0 psig |
| Humidity | 60% (nominal) |
| Radiation Dose Rate | Negligible |

Accident Conditions

Temperature

Pressure

Humidity Radiation Flooded Depth 220°F for 30 min; then decreasing to 100°F within 3 h 1.14 psig on mezzanine and basement levels; 0.7 psig on operating floor 100% Negligible 1.5 ft in basement

Environment 8 - Relay Rooms and Battery Rooms

Normal Operation

| Temperature | 50-104°F |
|---------------------|---------------|
| Pressure | 0 psig |
| Humidity | 60% (nominal) |
| Radiation Dose Rate | Negligible |

Accident Conditions

| Temperature | < 104°F |
|-------------|---------------|
| Pressure | 0 psig |
| Humidity | 60% (nominal) |
| Radiation | Negligible |

Environment 9 - Mechanical Equipment Room

Normal Operation

| Temperature | | 50-104°F |
|----------------|------|---------------|
| Pressure | | 0 psig |
| Humidity | | 60% (nominal) |
| Radiation Dose | Rate | Negligible |
| | | |

Accident Conditions (HELB)

| Temperature | < 104°F |
|---------------|---------------|
| Pressure | 0 psig |
| Humidity | 60% (nominal) |
| Radiation | Negligible |
| Spray | None |
| Flooded Depth | Approx. 3 ft |

Environment 10 - Control Room

Normal Operation

Temperature

Pressure Humidity Radiation Dose Rate

Accident Conditions

| Temperature |
|-------------|
| Pressure |
| Humidity |
| Radiation |

50-104°F (usually maintained at 70-78°F) 0 psig 60% (nominal) Negligible

104°F O psig 60% (nominal) Negligible

A-6



Figure A-1. Identification of Individual Buildings and Specific Areas at Ginna Plant [1]

> FIGURE SUPPLIED BY THE LICENSEE



Time After Design Basis Accident (seconds)

FIGURE SUPPLIED BY THE LICENSEE

Figure A-2. Design Basis Accident Temperature and Pressure as Functions of Time [1]



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Figure A-4. Containment Temperature Steam Break HZP 1/2 Spray System

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FIGURE SUPPLIED BY THE LICENSEE



Figure A-5. Containment Pressure Steam Break HZP 1/2 Spray System

FIGURE SUPPLIED

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Figure A-6. Containment Temperature Steam Break HFP 1/2 Spray System

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FIGURE SUPPLIED BY THE LICENSEE

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Figure A-7. Containment Pressure Steam Break HFP 1/2 Spray System

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FIGURE SUPPLIED BY THE LICENSEE
APPENDIX B - LISTING OF SAFETY-RELATED ELECTRICAL EQUIPMENT

The following table lists the groupings of safety-related electrical equipment items for the R. E. Ginna Station. Equipment items provided in the table are used in the detailed equipment environmental qualification evaluation presented in Section 4.4 and summarized in Section 4.2. This table was generated from the lists of equipment provided by the Licensee [1,62].

The Licensee identified an extensive list of safety-related electrical equipment in various locations of the plant. The equipment listed by the Licensee was analyzed, and all identical equipment located within plant areas that are exposed to the same environmental service conditions was grouped together and designated an "equipment item." In this report, the term "equipment item" refers to a specific type of electrical equipment, designated by manufacturer and model, which is representative of all identical equipment in a plant area exposed to the same environmental service conditions (e.g., Flow Transmitter, Fischer & Porter, Model 10B2496, located within containment). This analysis resulted in a reduced listing of equipment (equipment items) that formed the basis for the review. This appendix contains the tabulation of the equipment items, locations, function, plant identification numbers, required operating time, and applicable qualification documentation references.

Equipment Item No. 1 Solenoid Valves Located in Turbine Building (Area #7) Automatic Switch Co. (ASCO) Model LB8300B61U Actuates Feedwater Control Valves (V-4269, V-4270) Licensee Reference 1617 Required Operating Time: Short term (SI signal) TER Checksheet No. 1 Reference 59, Section 4.5.2.6 Licensee Submittal: Page 9 [62]; Table 3, Page 1 [1]; FRC SCEW 1

Equipment Item No. 2 Solenoid Valves Located in Turbine Building (Area #7) Automatic Switch Co. (ASCO) Model LB8300B64RU Actuates Feedwater Bypass Valves (V-4271, V-4272) Licensee Reference 1617 Required Operating Time: Short term (SI signal) TER Checksheet No. 2 Reference 59, Section 4.5.2.6 Licensee Submittal: Page 9 [62]; Table 3, Page 1 [1]; FRC SCEW 2

Equipment Item No. 3 Solenoid Valves Located in Auxiliary Building (Area #2) Copes-Vulcan Co. Model D-100-60 Actuates NaOH to CS Valves (AOV-836 A,B) Licensee Reference 1617 Required Operating Time: Short term (minutes) TER Checksheet No. 3 Reference 59, Section 4.7.5 Licensee Submittal: Table 3, Page 1 [1]; FRC SCEW 3

Equipment Item No. 4 Solenoid Valves Located in Intermediate Building (Area #3) Lawrence Co. Model 110114W Actuates Main Steam Isolation Valves - Supply Side (V-3516) Licensee Reference 18 Required Operating Time: Very short (seconds) TER Checksheet No. 4 Reference 59, Section 4.5.2.10 Licensee Submittal: Page 10 [62]; Table 3, Page 1 [1]; FRC SCEW 4

Equipment Item No. 5 Solenoid Valves Located in Intermediate Building (Area #3) Lawrence Co. Model 125434W Actuates Main Steam Isolation Valves - Vent Side (V-3517) Licensee Reference 18 Required Operating Time: Very short (seconds) TER Checksheet No. 5 Reference 59, Section 4.5.2.10 Licensee Submittal: Page 10 [62]; Table 3, Page 1 [1]; FRC SCEW 5

Equipment Item No. 6 Solenoid Valves Located Inside Containment (Area #1) Versa Valve Co. Model VSG Actuates Containment Recirculation System Dampers (V-5871 through V-5876) Licensee Reference 19 Required Operating Time: Very short (seconds) TER Checksheet No. 6 Reference 59, Section 4.5.2.11 Licensee Submittal: Page 10 [62]; Table 3, Page 1 [1]; FRC SCEW 6

Equipment Item No. 7 Solenoid Valves Located in Auxiliary Building (Area #2) Automatic Switch Co. (ASCO), Model Not Stated Actuates SI Recirculation Valves (AOV-897, 898) Licensee Reference 1617 Required Operating Time: Short term (before sump recirculation) TER Checksheet No. 7 Reference 59, Section 4.7.4 Licensee Submittal: Table 3, Page 2 [1]; FRC SCEW 7

Equipment Item No. 8 Solenoid Valves Located Inside Containment (Area #1) Versa Valve Co. Model VSG-3731 Actuates Containment Purge Valves (Plant ID Not Stated) Licensee Reference 19 Required Operating Time: Seconds TER Checksheet No. 8 Reference 59, Section 4.6.9 Licensee Submittal: Page 13 [62]; Table 3, Page 2 [1]; FRC SCEW 8

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Equipment Item No. 9 Solenoid Valves Located Inside Containment (Area #3) Versa Valve Co. Model VSG-3421 Actuates Containment Depressurization Valves (Plant ID Not Stated) Licensee Reference 19 Required Operating Time: Seconds TER Checksheet No. 9 Reference 59, Section 4.6.9 Licensee Submittal: Page 13 [62]; Table 3, Page 2 [1]; FRC SCEW 9

Equipment Item No. 10 Solenoid Valves Located Inside Containment (Area #1) Valcor Engineering Corp. Model V57300 Pressurizer PORVs (Plant ID Not Stated) Licensee References 1547, 1568, 1569, 1801, 1835, 2796, 2797, 2798, 2799, 2800, and 2801 Required Operating Time: Long term TER Checksheet No. 10 Reference 59, Section 4.6.12 Licensee Submittal: Page 15 [62]; Table 3, Page 10 [1]; FRC SCEW 62

Equipment Item No. 11 Solenoid Valves Located in Basement of Control Building (Area #8) Johnson Controls Model D251 Actuation of Control Room Air Handling Unit Dampers (Plant ID Not Stated) Licensee reference not cited Required Operating Time: Short term TER Checksheet No. 11 Reference 59, Section 4.7.17 Licensee Submittal: Table 3, Page 11 [1]; FRC SCEW 67

Equipment Item No. 12 Motorized Valve Actuators Located Inside Containment (Area #1) Limitorque Model SMB-2 with Reliance Electric Co. Motor Operates Accumulator Discharge Valve (MOV-841, 865) Licensee References 26, 637, and 639 Required Operating Time: Not required to operate TER Checksheet No. 12 Reference 59, Section 4.4.1 Licensee Submittal: Page 7 [62]; Table 3, Page 2 [1]; FRC SCEW 10

Equipment Item No. 13 Motorized Valve Actuators Located in Auxiliary Building (Area #2) Limitorque Model SMB-00 with Peerless Electric Co. Motor Actuates BAST to SI Pump Valves (MOV-826A, B, C, D); and RWST to SI Pump Valves (MOV-896A, B) Licensee Reference 12 Required Operating Time: Short term (before sump recirculation) TER Checksheet No. 13 Reference 59, Section 4.3.3.4 Licensee Submittal: Page 6 [62]; Table 3, Page 2 [1]; FRC SCEW 11, 12

Equipment Item No. 14 Motorized Valve Actuators Located in Auxiliary Building (Area #2) Limitorque Model SMB-00 with Reliance Electric Co. Motor Actuates Valves in Lines Between RWST and SI Pumps Valve (MOV-825A, B) Licensee References 12, 87, and 662 Required Operating Time: Short term (before sump recirculation) TER Checksheet No. 14 Reference 59, Section 4.3.3.5 Licensee Submittal: Page 7 [62]; Table 3, Page 3 [1]; FRC SCEW 13

Equipment Item No. 15 Motorized Valve Actuators Located in Intermediate Building (Area #3) Limitorque Model SMB-00 with Reliance Electric Co. Motor Actuates AFW Discharge Valves (MOV-4007, 4008); AFW Suction Valves (MOV-4027, 4028); and AFW Cross-Connect Valves (MOV-4000A, B) Licensee reference not cited Required Operating Time: Short term. TER Checksheet No. 15 Reference 59, Section 4.3.3.1 Licensee Submittal: Page 5 [62]; Table 3, Page 3 [1]; FRC SCEW 14, 15, 16

Equipment Item No. 16 Motorized Valve Actuators Located in Auxiliary Building (Area #2) Limitorque Model SMB-00 with Reliance Electric Co. Motor Actuates Sump Valves (MOV-850A, B); RHR to SI Valves (MOV-857A, B, C); RWST to RHR Valves (MOV-856); and CS Valves (MOV-860A, B, C, D and MOV-704A, B) Licensee References 87, 637, 639, 659, and 662 Required Operating Time: Long term TER Checksheet No. 16 Reference 59, Section 4.3.1.4 Licensee Submittal: Page 5 [62]; Table 3, Page 3 [1]; FRC SCEW 17, 18, 19, 20

Equipment Item No. 17 Motorized Valve Actuators Located Inside Containment (Area #1) Limitorque Model SMB-00 with Peerless Motor Actuates Valves for RHR Suction from Sump B (MOV-851A, B); SI Valves to Cold Legs (MOV-878B, D); SI Valves to Hot Legs (MOV-878A, C) Licensee Reference 12 Required Operating Time: Not required to operate TER Checksheet No. 17 Reference 59, Section 4.4.2 Licensee Submittal: Page 7 [62]; Table 3, Pages 3 and 4 [1]; FRC SCEW 21, 22, 72

Equipment Item No. 18 Motorized Valve Actuators Located Inside Containment (Area #1) Limitorque Model SMB-1 with Reliance Electric Co. Motor Actuates Core Deluge Valves (MOV-852A, B) Licensee References 26, 637, and 639 Required Operating Time: SI signal TER Checksheet No. 18 Reference 59, Section 4.3.3.2 Licensee Submittal: Page 6 [62]; Table 3, Page 4 [1]; FPC SCEW 23

Equipment Item No. 19 Motorized Valve Actuators Located in Auxiliary Building Addition (Area #6) Limitorque Model SMB-00 with Reliance Electric Co. Motor Actuates Standby AFW Valves (MOV-9703A, B; 9704A, B; 9710A, B) Licensee References 27, 30, and 33 Required Operating Time: Long term TER Checksheet No. 19 Reference 59, Section 4.7.2 Licensee Submittal: Table 3, Page 4 [1]; FRC SCEW 24, 25, 26

Equipment Item No. 20 Motors Located in Auxiliary Building Addition (Area #6) General Electric Type K, 250 hp Drive Standby Auxiliary Feedwater Pumps (Plant ID Not Stated) Licensee References 27 and 30 Required Operating Time: Long term TER Checksheet No. 20 Reference 59, Section 4.7.6 Licensee Submittal: Table 3, Page 4 [1]; FRC SCEW 27

Equipment Item No. 21 Motors Located in Auxiliary Building (Area #2) Westinghouse 444 TS TBDP 200 hp Containment Spray Pump Motors (Plant ID Not Stated) Licensee References 604 and 605 Required Operating Time: Long term TER Checksheet No. 21 Reference 59, Section 4.7.7 Licensee Submittal: Page 14 [62]; Table 3, Page 4 [1]; FRC SCEW 29

Equipment Item No. 22 Motors Located in Auxiliary Building (Area #2) Westinghouse 444 TS TBDP 150 hp Component Cooling Water Pump Motors (Plant ID Not Stated) Licensee References 604 and 605 Required Operating Time: Long term TER Checksheet No. 22 Reference 59, Section 4.7.7 Licensee Submittal: Page 14 [62]; Table 3, Page 4 [1]; FRC SCEW 28

Equipment Item No. 23 Motors Located in Auxiliary Building (Area #2) Westinghouse 445 TS TBDP 200 hp RHR Pump Motors (Plant ID Not Stated) Licensee References 42, 604, and 605 Required Operating Time: Long term TER Checksheet No. 23 Reference 59, Section 4.7.7 Licensee Submittal: Page 14 [62]; Table 3, Page 4 [1]; FRC SCEW 30

Equipment Item No. 24 Motors Located on Basement Level of Intermediate Building Westinghouse Type 505US ABDP, 250 hp Drive Auxiliary Feedwater Pumps (Plant ID Not Stated) Licensee References 42 and 604 Required Operating Time: Long term TER Checksheet No. 24 Reference 59, Section 4.6.2 Licensee Submittal: Table 3, Page 5 [1]; FRC SCEW 31

Equipment Item No. 25 Motors Located in the Auxiliary Building (Area #3) Westinghouse 509 US AFDP 350 hp Safety Injection Pump Motors (Plant ID Not Stated) Licensee References 42 and 604 Required Operating Time: Long term TER Checksheet No. 25 Reference 59, Section 4.7.7 Licensee Submittal: Page 14 [62]; Table 3, Page 5 [1]; FRC SCEW 32

Equipment Item No. 26 Motors Located in Screen House (Area #5) Westinghouse 509 UPH ABDP, 300 hp Drive Service Water Pumps (Plant ID Not Stated) Licensee Reference 42 Required Operating Time: Long term TER Checksheet No. 26 Reference 59, Section 4.7.8 Licensee Submittal: Table 3, Page 5 [1]; FRC SCEW 33

Equipment Item No. 27 (TMI Action Plan Item) Motor Located Inside Containment (Area #1) Westinghouse Model TEFC 2-hp, 3-phase, 60-Hz, 230/460-V Drives Hydrogen Recombiner Blower (Plant ID Not Stated) Licensee References 585, 637, and 639 Required Operating Time: Long term TER Checksheet No. 27 Reference 59, Section 4.7.3 Licensee Submittal: Page 14 [62]; Table 3, Page 11 [1]; FRC SCEW 65

Equipment Item No. 28 Motors Located in Auxiliary Building (Area #2) U.S. Electrical Motors Model VEU, 100 hp Frame 84-445U, Class B Insulation Drive Charging Pumps (Plant ID Not Stated) Licensee reference not cited Required Operating Time: Long term TER Checksheet No. 28 Reference 59, Section 4.7.16 Licensee Submittal: Table 3, Page 11 [1]; FRC SCEW 66



Equipment Item No. 29 Motors Located in Auxiliary Building (Area #2) Westinghouse Model SBDP, 2 hp, Class B Insulation Drive Cooling Fans for RHR Pump Motors (Plant ID Not Stated) Licensee Reference 605 Required Operating Time: Long term TER Checksheet No. 29 Reference 59, Section 4.7.12 Licensee Submittal: Page 15 [62]; Table 3, Page 12 [1]; FRC SCEW 70 Fuipment Item No. 30 (Stors Located in Auxiliary Building (Area #2) Westinghouse Model SBDP, 3 hp, Class B Insulation Drive Cooling Fans for CS, Charging Pumps, and SI Pump Motors (Plant ID Not Stated) Licensee Reference 605 Required Operating Time: Long term TER Checksheet No. 30 Reference 59, Section 4.7.12 Licensee Submittal: Page 15 [62]; Table 3, Page 12 [1]; FRC SCEW 69 Equipment Item No. 31 Electrical Penetrations Located Within and Outside Containment (Area #1) Crouse-Hinds Co. (Various Conductor Configurations; Models Not Stated) Provides Connection for Electrical Circuits Licensee References 33, 37, 40, 537, and 749 Required Operating Time: Long term TER Checksheet No. 31 Refere ce 59, Section 4.2.1.1 Licensee Submittal: Page 5 [62]; Table 3, Page 5 [1]; FRC SCEW 34 Equipment Item No. 32 Electrical Penetration Located Both Within and Outside Containment (Area #1) Westinghouse, Model Not Stated Provides Connection for Electrical Circuits Licensee References 38, 2098, 2099, 2100, 2101, 2102, 2103, 2104, and 2105 Required Operating Time: Long term TER Checksheet No. 32 Reference 59, Section 4.6.3 Licensee Submittal: Page 11 [62]; Table 3, Page 5 [1]; FRC SCEW 35

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Equipment Item No. 33 Terminal Blocks Located Inside Containment (Area #1) Westinghouse Model 542247 Provides Connection for Electrical Circuits Licensee References 31, 39, and 718 Required Operating Time: Long term TER Checksheet No. 33 Reference 59, Section 4.6.4 Licensee Submittal: Page 12 [62]; Table 3, Page 6 [1]; FRC SCEW 36

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Equipment Item No. 34 Electric Cables Located Inside Containment (Area #1) Kerite Co. Cable Type HT Power Cables, Provides Electrical Distribution Licensee References 10, 34, 574, and 2052 Required Operating Time: Long term TER Checksheet No. 34 Reference 59, Section 4.5.2.3 Licensee Submittal: Page 7 [62]; Table 3, Page 6 [1]; FRC SCEW 37

Equipment Item No. 35 Electric Cables Located Inside Containment Kerite Co. Cable Type HT Control Cable, Provides Electrical Distribution Licensee References 10, 34, 574, and 2052 Required Operating Time: Long term TER Checksheet No. 35 Reference 59, Section 4.5.2.3 Licensee Submittal: Page 7 [62]; Table 3, Page 6 [1]; FRC SCEW 37

Equipment Item No. 36 Electric Cables Located Outside Containment Kerite Co., Cable Type HT Control Cable, Provides Electrical Distribution Licensee References 10, 34, 574, and 2052 Required Operating Time: Long term TER Checksheet No. 36 Reference 59, Section 4.3.3.3 Licensee Submittal: Page 6 [62]; Table 3, Page 6 [1]; FRC SCEW 38

Equipment Item No. 37 Electrical Cable Located Inside Containment (Area #1) Coleman Cable Co. Instrumentation Cables Licensee References 29 and 2052 Required Operating Time: Long term TER Checksheet No. 37 Reference 59, Section 4.5.2.7 Licensee Submittal: Page 9 [62]; Table 3, Page 6 [1]; FRC SCEW 39

Equipment Item No. 38 Electrical Cables Located Outside Containment Coleman Cable Co. Provides Electrical Distribution Licensee References 29 and 2052 Required Operating Time: Long term TER Checksheet No. 38 Reference 59, Section 4.5.2.8 Licensee Submittal: Page 10 [62]; Table 3, Page 6 [1]; FRC SCEW 40

Equipment Item No. 39 Electrical Cables Located Outside Containment Rome Cable Co. Licensee References 9, 29, and 2052 Required Operating Time: Long term TER Checksheet No. 39 Reference 59, Section 4.5.2.8 Licensee Submittal: Page 9 [62]; Table 3, Page 7 [1]; FRC SCEW 41

Equipment Item No. 40 Electrical Cables Located Outside Containment General Cable Co. Licensee References 9, 29, and 2052 Required Operating Time: Long term TER Checksheet No. 40 Reference 59, Section 4.5.2.9 Licensee Submittal: Page 10 [62]; FRC SCEW 42

Equipment Item No. 41 Level Transmitter Located in Auxiliary Building (Area #2) Foxboro Model 611 GM-ASI RWST Level (LT-920) Licensee reference not cited Required Operating Time: Short term (before sump recirculation) TER Checksheet No. 41 Reference 59, Section 4.3.1.3 Licensee Submittal: Page 5 [62]; Table 3, Page 7 [1]; FRC SCEW 43

Equipment Item No. 42 Level Switch Located in Auxiliary Building (Area #2) ITT-Barton Model 289 RWST Level (LIC-921) Licensee reference not cited Required Operating Time: Short term (before sump recirculation) TER Checksheet No. 42 Reference 59, Section 4.5.2.2 Licensee Submittal: Page 7 [62]; Table 3, Page 7 [1]; FRC SCEW 44

Equipment Item No. 43 Flow Transmitters Located Inside Containment (Area #1) Barton Model 332 Steam Line Flow Transmitters (FT-464, 465, 474, and 475) Licensee Reference 567 Required Operating Time: Seconds TER Checksheet No. 43 Reference 59, Section 4.6.7 Licensee Submittal: Page 12 [62]; Table 3, Page 7 [1]; FRC SCEW 45

Equipment Item No. 44 Pressure Transmitters Located in Intermediate Building ITT-Barton Model 332 Containment Pressure Transmitters (PT-945, 946, 947, 948, and 949) Licensee Reference 567 Required Operating Time: Long term TER Checksheet No. 44 Reference 59, Section 4.6.8 Licensee Submittal: Page 13 [62]; Table 3, Page 7 [1]; FRC SCEW 46

Equipment Item No. 45 Pressure Transmitters Located Inside Containment (Area #1) Foxboro Model 611 GM-DSI Pressurizer Pressure (PT-429, 430, 431, 449) Licensee References 637 and 639 Required Operating Time: Short term TER Checksheet No. 45 Reference 59, Section 4.6.5 Licensee Submittal: Page 12 [62]; Table 3, Page 8 [1]; FRC SCEW 47

Equipment Item No. 46 Pressure Transmitters Located in Intermediate Building (Area #3) Foxboro Model 611 GM-DSI Steam Line Pressure (PT-468, 469, 478, 479, 482, 483) Licensee References 637 and 639 Required Operating Time: Short term TER Checksheet No. 46 Reference 59, Section 4.3.1.1 Licensee Submittal: Page 5 [62]; Table 3, Page 8 [1]; FRC SCEW 48

Equipment Item No. 47 Level Transmitters Located Inside Containment (Area #1) Foxboro Model 613 M-MDL, Modified Monitors Pressurizer Level (LT-426, 427, 428, and 433) Licensee reference not cited Required Operating Time: Not specified TER Checksheet No. 47 Reference 59, Section 4.6.6 Licensee Submittal: Page 12 [62]; Table 3, Page 8 [1]; FRC SCEW 49

Equipment Item No. 48 Level Transmitters Located in Auxiliary Building (Area #2) Foxboro Model 613 DM-MSI BAST Level (LT-102, 106, 171, 172) Licensee reference not cited Required Operating Time: Short term TER Checksheet No. 48 Reference 59, Section 4.3.1.2 Licensee Submittal: Page 5 [62]; Table 3, Page 8 [1]; FRC SCEW 50

Equipment Item No. 49 Level Transmitters Located Inside Containment (Area #1) Foxboro Model 613 HM-HSI Steam Generator Level (LT-470, 471, 472, 473, 460, 461, 462, 463) Licensee reference not cited Required Operating Time: Not specified TER Checksheet No. 49 Reference 59, Section 4.6.11 Licensee Submittal: Page 13 [62]; Table 3, Page 8 [1]; FRC SCEW 51

Equipment Item No. 50 (TMI Action Plan Item II.F.2) Resistance Temperature Detectors Located Inside Containment (Area #1) Rosemount Model 176JA Reactor Coolant System Temperature (Plant ID Not Stated) Licensee Reference 571 Required Operating Time: Not specified TER Checksheet No. 50 Reference 59, Section 4.6.10 Licensee Submittal: Page 13 [62]; Table 3, Page 9 [1]; FRC SCEW 52

Equipment Item No. 51 Battery Banks Located in Battery Rooms on Basement Level of Control Building (Area #8) Gould Industrial Battery Division, Model FTA-19 Provide DC Power Supply (Plant ID Not Stated) Licensee Reference 22 Required Operating Time: Long term TER Checksheet No. 51 Reference 59, Section 4.7.9 Licensee Submittal: Table 3, Page 9 [1]; FRC SCEW 53

Equipment Item No. 52 Diesel Generator Electrical Equipment Located in D/G Annex (Area #4) ALCO Diesel Engine, Model 251F and Controls Power Supply to Safeguards Buses (Plant ID Not Stated) Licensee reference not cited Required Operating Time: Long term TER Checksheet No. 52 Reference 59, Section 4.7.10 Licensee Submittal: Table 3, Page 9 [1]; FRC SCEW 54

Equipment Item No. 53 Diesel Generator Electrical Equipment Located in D/G Annex (Area #4) Westinghouse 1900 kW Generator and Controls Power Supply to Safeguards Buses (Plant ID Not Stated) Licensee reference not cited Required Operating Time: Long term TER Checksheet No. 53 Reference 59, Section 4.7.10 Licensee Submittal: Table 3, Page 9 [1]; FRC SCEW 55



Equipment Item No. 54 Diesel Generator Electrical Equipment Located in D/G Annex (Area #4) Westinghouse Model 1 hp TEFC AC Motor Drives Fuel Oil Transfer Pump (Plant ID Not Stated) Licensee reference not cited Required Operating Time: Long term TER Checksheet No. 54 Reference 59, Section 4.7.10 Licensee Submittal: Table 3, Page 9 [1]; FRC SCEW 56

Equipment Item No. 55 Reactor Containment Fan Cooler Motors Located Inside Containment (Area #1) Westinghouse 588.5-CSP Containment Cooling (Plant ID Not Stated) Licensee References 40, 41, 42, 606, 637, 539, and 640 Required Operating Time: Long term TER Checksheet No. 55 Reference 59, Section 4.5.2.4 Licensee Submittal: Page 7 [62]; Table 3, Page 9 [1]; FRC SCEW 57

Equipment Item No. 56 Medium Voltage Switchgear Located in Intermediate Building (Area #3) Westinghouse Model DB-50A 1600-A Controls Reactor Trip System Power (Plant ID Not Stated) Licensee Reference 2898 Required Operating Time: Seconds TER Checksheet No. 56 Reference 59, Section 4.6.1 Licensee Submittal: Page 10 [62]; Table 3, Page 9 [1]; FRC SCEW 58

Equipment Item No. 57 Medium Voltage Switchgear Located in Turbine Building (A-7) Westinghouse Electric Corporation Model DH-350E 1200-A Controls Power to Reactor Coolant Pump Motors Licensee reference not cited Required Operating Time: Seconds TER Checksheet No. 57 Reference 59, Section 4.6.1 Licensee Submittal: Page 10 [62]; Table 3, Page 9 [1]; FRC SCEW 68

Equipment Item No. 58 I&C Cabinets Located in the Relay Room on Intermediate Level of Control Building (Area #8) Foxboro Co., Model Not Stated Provide Housing for I&C RP Circuits (Plant ID Not Stated) Licensee reference not cited Required Operating Time: Long term TER Checksheet No. 58 Reference 59, Section 4.7.13 Licensee Submittal: Not Stated; FRC SCEW 59

Equipment Item No. 59 Various Relay Racks Located in Relay Room on Intermediate Level of Control Building Westinghouse, Model Not Stated Licensee reference not cited Required Operating Time: Long term TER Checksheet No. 59 Reference 59, Section 4.7.13 Licensee Submittal: Table 3, Page 10 [1]; FRC SCEW 71

Equipment Item No. 60 HVAC System Located Outside Containment (Area #8) Westinghouse System Z162 Provides HVAC of Control Room Atmosphere (Plant ID Not Stated) Licensee reference not cited Required Operating Time: Long term TER Checksheet No. 60 Reference 59, Section 4.7.14 Licensee Submittal: Table 3, Page 10 [1]; FRC SCEW 60

Equipment Item No. 61 Cable Splices Located Inside Containment (Area #1) Raychem Co. Type WCSF-N Provide Circuit Continuity (Plant ID Not Stated) Licensee References 25, 35, 574, 2052, and 2099 Required Operating Time: Long term TER Checksheet No. 61 Reference 59, Section 4.5.2.5 Licensee Submittal: Page 9 [62]; Table 3, Page 10 [1]; FRC SCEW 61

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Equipment Item No. 62 (TMI Action Plan Item II.F.1) Level Switches Located Inside Containment (Area #1) Gems Corporation, Special Model, Similar to LS-1900 Containment Sump "B" Level (LC-942 and -943) Licensee reference not cited Required Operating Time: Not specified TER Checksheet No. 62 Reference 59, Section 4.7.11 Licensee Submittal: Table 3, Page 10 [1]; FRC SCEW 63

Equipment Item No. 63 (TMI Action Plan Item) Hydrogen Recombiner Igniter Exciter Units Located Inside Containment (Area #1) Westinghouse GLA Part No. 43737, Rev. A Hydrogen Recombination (Plant ID Not Stated) Licensee References 585, 637, and 639 Required Operating Time: Long term TER Checksheet No. 63 Reference 59, Section 4.7.18 Licensee Submittal: Page 14 [62]; Table 3, Page 11 [1]; FRC SCEW 64

Equipment Item No. 64 (TMI Action Plan Item II.D.3) Limit Switch Located Inside Containment (Area #1) NAMCO, Model Not Stated Position Indication for the Pressurizer Safety and Relief Valves (Plant ID Not Stated) Licensee References 2041 and 2795 Required Operating Time: Not specified TER Checksheet No. 64 Licensee Submittal: Page 1 [65]; FRC SCEW 73

Equipment Item No. 65 (TMI Action Plan Item II.D.3) Linear Variable Differential Transformer Limit Switch Located Inside Containment (Area #1) Schaevitz Model 500-HCA Position Indication for the Pressuri er Safety and Relief Valves (Plant ID Not Stated) Licensee Reference 2041 Required Operating Time: Not specified TER Checksheet No. 65 Licensee Submittal: Page 1 [65]; FRC SCEW 74



Equipment Item No. 66 (TMI Action Plan Item II.B.1) Solenoid Valves Located Inside Containment (Area #1) Valcor Engineering Corp., Model Not Stated Reactor Vessel Head Vent (Plant ID Not Stated) Licensee References 1547, 1568, 1569, 1801, 1835, 2796, 2797, 2798, 2799. 2800, and 2801 Required Operating Time: Long term TER Checksheet No. 66 Licensee Submittal: Page 1 [65]; FRC SCEW 66 Equipment Item No. 67 Pressure Transmitters Located in Auxiliary Building ITT-Barton Model 332 Containment Pressure Transmitters (Plant ID Not Stated) Licensee Reference 567 Required Operating Time: Long term TER Checksheet No. 67 Reference 59, Section 4.5.2.1 Licensee Submittal: Page 13 [62]; Table 3, Page 7 [1]; FRC SCEW 46



APPENDIX C - PLANT SAFETY-RELATED SYSTEMS AND DISPLAY INSTRUMENTATION

In accordance with the DOR Guidelines, the Licensee was directed to establish a list of systems and display instrumentation needed to mitigate the consequences of a loss-of-coolant accident (LOCA) or a high energy line break (HELB), inside or outside containment, and reach safe shutdown. The lists of safety-related systems and display instrumentation were developed from a review of plant safety analyses and emergency procedures. The display instrumentation selected included equipment needed to monitor overall plant performance as well as performance of the systems on the list. The systems list was established on the basis of the functions that must be performed in order to mitigate the consequences of a LOCA or HELB without regard to location of equipment relative to a potentially hostile environment. The NRC staff determined and verified that the systems considered by the Licensee are those required to achieve or support: (1) emergency reactor shutdown, (2) containment isolation, (3) reactor core cooling, (4) containment heat removal, (5) core residual heat removal, and (6) prevention of significant release of radioactive material to the environment. The systems and instrumentation list, as provided in the NRC SER of June 1, 1981, is contained in this appendix.

In its SER dated June 1, 1981 [61], the NRC indicated that the Licensee should provide justifications for certain equipment items which had been identified as important to safety but were not included on the list of equipment to be qualified. Technical evaluations of the justifications provided by the Licensee are also included in this appendix.

In addition, the Licensee has indicated that certain instrument items should be deleted from and others should be added to the list of accident mitigating and safe shutdown instruments. A technical evaluation of the Licensee's rationale for deleting these items is also provided in this appendix.

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C.1 SYSTEMS AND DISPLAY INSTRUMENTATION LIST

A. Safe Shutdown Systems

Reactor Protection/Trip System* Main Steam (MSIVs, Safeties, Atmospheric Reliefs)* Auxiliary Feedwater*/Standby Auxiliary Chemical and Volume Control (Charging Portions)* Residual Heat Removal** Component Cooling Service Water Diesel Generator* 125-V dc Power Supply System* Diesel Oil* Vital Instrument Power Supply* Auxiliary Power Distribution System Primary Auxiliary Building Ventilation System Control Building HVAC Systems Diesel Room Ventilation Systems

B. Accident Mitigating System (LOCA, MSLB, FWLB)

Pressurizer Pressure Relief Containment Isolation System* Reactor Containment Fan Coolers, Hydrogen Purge and Hydrogen Recombiners Safety Injection and Accumulators Post-Accident Sampling and Monitoring/Containment Radiation Monitor Containment Spray Feedwater Control and Bypass Valves/Feedpump Trip/Feedpump Discharge Valves Pump Room Ventilation Coolers (RHR/SI/I/L/CS/CCP) Control Room Ventilation Main Steam Isolation Valves

*Systems required for both safe shutdown and accident mitigation. **System required for cold shutdown only.

C. Accident Mitigating and Safety Shutdown Instruments (LOCA, MSLB, FWLB)

Pressurizer Level Pressurizer Pressure RCS Temperature Containment Pressure*** Steam Line Pressure Steam Line Flow Safety Injection Flow*** Sump Level*** Steam Generator Level Auxiliary Feed System Flow Chemical and Volume Control Flow RWST Level BAST Level*** Residual Heat Removal Flow Component Cooling Water Flow Service Water System Diesel Generator Emergency ac Power Emergency dc Power

***Instruments required only for accident mitigation purposes.

C.2 LICENSEE JUSTIFICATION FOR OMITTING CERTAIN EQUIPMENT ITEMS FROM THE LIST

C.2.1 Item 4.1.1, Atmospheric Steam Dump Valves

Licensee Discussion [62]

"In 4.1.1, it is noted that certain other items should be added to the list of safety-related electrical equipment requiring environmental qualification. These are discussed below:

Steam dump to atmosphere valves. These valves are required only for eventual cold shutdown of the reactor, not for accident mitigation. As discussed in Section 3.2 of the NRC's 'SEP Review of Safe Shutdown Systems for the R. E. Ginna Nuclear Power Plant,' manual operation of the atmospheric dump valves is acceptable. There is thus no need to qualify this equipment."

Evaluation

As pointed out by the NRC in the SEP Review of Safe Shutdown Systems for Ginna, atmospheric steam dump valves are air-operated valves, the air supply to which is not Class I. However, the NRC found manual operation of these valves to be acceptable. In Section 3.2 of the report, under the heading Steam Generator Heat Removal, the NRC stated:

"The safety-grade shutdown components associated with the Main Steam System are the main steam isolation valves (MSIV), the steam safety valves, and the steam atmospheric dump valves. Each of the two Ginna steam generators is equipped with an air-operated, solenoid controlled MSIV, four code safety valves, and one air-operated atmospheric dump valve. By shutting the MSIVs from the control room, the operator can limit the shutdown and cooldown of the plant to the use of redundant main steam equipment.* The MSIVs fail shut on loss of control air. For core decay heat removal with natural circulation of the reactor coolant, only one steam generator and one of its four safety valves are required to remove core decay heat a few seconds after reactor trip. One atmospheric steam dump valve which can be operated from the control room using the plant compressed air system is sufficient for maintaining hot shutdown or for cooldown of the RCS below hot shutdown conditions. However, the plant air systems are not Class I so manual opening of the atmospheric dump would be required if the shutdown procedures were limited to use

*The operator would not normally do this unless the systems which are normally used for shutdown and cooldown were not operable.

of safety grade equipment alone. Since there is no need to proceed immediately from hot shutdown to cold shutdown, an operator is not required to man an atmospheric dump within the first half hour to several hours after achieving hot shutdown. We have determined that this manual operation of the atmospheric dumps is acceptable under the provisions of the BTP."

Conclusion

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The atmospheric steam dump valves do not require environmental qualification because they are not required to perform an accident mitigation function and because manual operation is acceptable for cold shutdown purposes.



C.2.2 Item 4.1.1, Valve Actuators 878A and 878C

Licensee Discussion [62]

"In 4.1.1, it is noted that certain other items should be added to the list of safety-related electrical equipment requiring environmental qualification. These are discussed below:

Actuators for valves in the hot leg injection paths (878A, 878C). A discussion of these valves was inadvertently omitted. These should have been discussed together with item 8G of the October 31, 1980 submittal (878B, 878D). The 878A and 878C valves are locked in position (closed) with power removed. No credit is taken for hot leg Safety Injection flow in the Ginna Safety Analysis. These valves should thus be classified in NRC Category III, equipment that is exempt from qualification."

Evaluation [59]

In evaluating Equipment Item 8G (Valves 878B and 878D, cold leg injection valves) in TER-C5257-178 [59], it was determined that these valves should be placed in NRC Category III because they were locked in their safety position (open) with power removed. However, valves 878A and 878C, the hot leg injection valves, are locked closed.

The Ginna Final Safety Analysis Report (FSAR), Section 6.2.2, states that the safety injection pumps deliver water through four connections, one in each hot leg and one in each cold leg of the RCS. Furthermore, Section 14.3, discussing small break LOCAs states:

"RESULTS - SMALL BREAKS

The preceding paragraphs have demonstrated the adequacy of the accumulators to terminate core exposure and limit the temperature rise of the core for large area ruptures. For smaller breaks the discharge of fluid through the hole is less severe and for small enough breaks the high head safety injection pump is capable of maintaining flooding of the core hot spot for the entire blowdown.

Three combinations of high head safety injection equipment operation were considered:

- 1. Full system; three pumps delivering through the four injection lines.
- 2. Single failure; two pumps delivering through three lines, one injection line isolation valve failed to open.

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 Single failure and broken safety injection line; one pump delivering to intact header and second pump delivering to second header with one line broken.

(This is a special case where the loss of coolant is caused by a break in the safety injection line between the reactor coolant pipe and the check valve in the injection line. In this case not only is the flow lost through the one line, but the effective cut-in pressure for delivery is reduced until the pressure loss due to flow in the spilling line equals the Reactor Coolant back pressure. Since the injection lines are only 2 inches in diameter, this case applies for break sizes 2 inches and smaller.)"

It is apparent that the FSAR assumes availability of the hot leg injection points. In fact, it appears that, with both hot leg injection valves disabled closed and a broken cold leg injection line, the system is reduced from three pumps discharging to four lines to one pump discharging to one line (the other two pumps pumping out the break). At this point, a single-active failure to that pump would cause all safety injection flow to be interrrupted until certain motor-cperated valves (such as MOV-871A and -871B) could be realigned to redirect the discharge of one of the operable pumps from the broken cold leg line to the intact line.

Consequently, it is not apparent why values 878A and 878C are locked closed. It is possible that modifications may have been made to the plant since the FSAR was written; however, from the documentation available, it does not appear that values 878A and 878C should be disabled closed.

Conclusion

Valves 878A and 878C should be qualified for the post-accident environment in order to retain post-accident operability.

C.2.3 Item 4.1.1, RHR Heat Exchanger Discharge Valves

Licensee Discussion [62]

"In 4.1.1, it is noted that certain other items should be added to the list of safety-related electrical equipment requiring environmental qualification. These are discussed below:

I/P converters in the RHR heat exchanger discharge valves. As discussed in our October 31, 1980 submittal, these controllers have no post-accident function (these RHR system valves are normally open, and need only remain open; the I/P controller fails open). It is thus not considered that qualification is required."

Evaluation

Although these values have no post-accident function other than to remain open, the Licensee should ensure that electrical failure of the converters will not affect other safety-related equipment or circuits.

Conclusion

Environmental qualification of the I/P converters is not required provided their failure cannot adversely affect other safety-related equipment or circuits.



C.2.4 Iten 4.1.1, Valve Limit Switches

Licensee Discussion [62]

"In 4.1.1, it is noted that certain other items should be added to the list of safety-related electrical equipment requiring environmental qualification. These are discussed below:

Limit switches. RG&E reference 44, 'Limit Switches,' includes a January 16, 1979 letter from Leon D. White, Jr. to Boyce H. Grier. This letter provides our rationale that limit switches need not be environmentally qualified for Ginna. In the case of containment isolation valve limit switches for position indication in particular, the NRC specifically exempted them from the list of safety-related electrical equipment during the May 5, 1980 site visit to Ginna. Note that containment isolation valve position indication is not listed in Table C of Appendix D of the SER."

Evaluation

The January 16, 1979, letter referred to in the Licensee's statement on page 3a makes essentially the following points:

- 1. Valve control circuits are unaffected by limit switch failure.
- Each inside isolation value is redundant to an outside containment isolation value.
- The circuits for the position indicators are non-lE; therefore, qualification of individual components within these circuits would not significantly increase safety.

The Licensee's arguments do not consider paragraph 3 of enclosure 2 to the DOR Guidelines [54], which states:

"(3) Plant emergency procedures typically include provisions for the operator to sample or monitor radioactivity levels or combustible gas levels, to confirm that valves are in the correct position, to monitor flow or temperature, etc. Some of these functions are essential for correct operator action, to mitigate accidents, and prevent radioactive releases. When this is the case, the radiation sensors, valve position indicators, pressure transmitters, thermo-couples, etc. should be qualified to function in the relevant accident environment."

Also, the Licensee's arguments do not consider the information disseminated at the July 1981 industry meetings on environmental qualification where the NRC established that display instruments needed to ensure that a safety function has been performed must be environmentally qualified.

In view of the recent emphasis on the reliability of display instruments needed for the operator to verify the proper functioning of safety-related equipment or systems, it does not appear logical to conclude that these instruments should not be qualified for the very accidents (LOCA, MSLBs) during which they are most likely to be needed. Furthermore, the redundant isolation valves are subject to possible single failure, during which time certain containment penetrations would have no available isolation indication for the operator to observe. As for the argument that the circuits are non-1E, this does not appear to be a valid justification for determining that environmental qualification would not generally improve the reliability of the indication.

Conclusion

Containment isolation valve limit switches should be qualified for the post-accident environment to which they are subject.

C.3 LICENSEE PROPOSED CHANGES TO THE LIST

C.3.1 Chemical and Volume Control Flow Instruments

Licensee Discussion [62]

"In Table C of Appendix D, a number of instruments appear which RC&E does not consider as being required for accident mitigation and/or safe shutdown. These instruments were not addressed in our October 31, 1980 submittal. For the reasons given below, the following instruments should be deleted from Table C.

Chemical and volume control flow -- This instrument is normally used only for safe shutdown to provide inventory control. However, pressurizer level information could also determine if inventory control was not being maintained."

Evaluation

Inventory control can be maintained by relying upon pressurizer level instrumentation assuming the lack of chemical and volume control instruments. However, these flow instruments most directly indicate the operation of a safety system. In addition, it is prudent to include the measurement of additional variables for backup information and for diagnosis. Although pressurizer level information can be used to determine inventory control, it cannot be used directly to verify the proper operation of the chemical and volume control system.

Conclusion

Chemical and volume control flow instruments should not be removed from the list of display instruments to be considered for environmental qualification.

C.3.2 Diesel Generator Emergency Power Indication

Licensee Discussion [62]

"In Table C of Appendix D, a number of instruments appear which RG&E does not consider as being required for accident mitigation and/or safe shutdown. These instruments were not addressed in our October 31, 1980 submittal. For the reasons given below, the following instruments should be delated from Table C.

Diesel generator, emergency AC power, emergency DC power--the effects of failure of these systems, resulting in failure of the powered equipment, would be apparent. There is thus no need for monitoring of the status of the electrical systems themselves."

Evaluation

As noted in Section 4 of this report, equipment environmental qualification checksheets for Equipment Items 52, 53, and 54 defer qualification review for the diesel generator and accessories because they are located in a mild environment.



C.3.3 Component Cooling Water and Service Water System

In Table A of Appendix D of the NRC SER [61], the component cooling water and service systems were identified as safe shutdown systems. The Licensee responded as follows [62]:

"The Component Cooling Water Flow and Service Water System indication were not addressed in the October 31 report, but will be added to the list of safety-related equipment. Since this equipment is in a mild environment, discussion of its environmental qualification requirements will be deferred."

The Licensee's response provides resolution of this concern.



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 [61]:

"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:

 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.

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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 completed review of the licensees' statements was presented to the NRC as a basis for justification for interim operation in the response to the NRC EEQ SER.* On February 5, 1982, at the NRC's request, 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 sovere 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.

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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: Rochester Gas and Electric Corporation Plant Name: R. E. Ginna NRC Docket No. 50-244 NRC TAC No. 42520 NRC Contract No. NRC-03-79-118 FRC Project No. C5257 FRC Assignment No. 13 FRC Task No. 454

References:

- a. J. E. Maier Letter to D. M. Crutchfield (NRC) Subject: Environmental Oualification of Safety Related Electrical Equipment, R.E. Ginna (Response to N°C's SER and FRC TER-C5257-178) Rochester Gas & Electric Corp., 04-Sept-81
- b. J. E. Maier Letter to D. G. Eisenhut (NRC) Subject: Environmental Qualification of Electrical Equipment, R.E. Ginna Nuclear Power Plant Rochester Gas & Electric Corp., 30-Jan-81
- c. Office of Nuclear Reactor Regulation Safety Evaluation Report for R.E. Ginna Plant; Environmental Qualification of Safety-Related Electrical Equipment NRC, 01-June-81

The Licensee has submitted technical information in Reference a in response to the NRC SER [c] on environmental qualification. FRC has reviewed these documents [a, b, c]. As a result of this review, FRC concludes that the Licensee has stated that the equipment items are environmentally qualified; or has provided a technically sound rationale as a basis for justification for continued plant operation; or has provided a technically sound rationale or other additional information which in FRC's judgment provides a basis for justification for continued operation; with the following exceptions:

| Equipment | Equipment Description/ | SCEW Sheet | | Basis for |
|-----------|------------------------|------------|-------------|------------|
| Item | Function | No. | Status Code | Deficiency |
| | | | | |

None

The Licensee's response to the SER addressed and provided resolution of deficiencies identified in the SER and provided adequate rationale as a basis for justification for interim operation."


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APPENDIX E - REQUEST FOR ADDITIONAL INFORMATION

This appendix contains the Request for Additional Information (RAI) that was developed during the course of the review and issued to the NRC for forwarding to the Licensee. The RAI was revised throughout the review to reflect the Licensee's response(s) to the RAI.

The reader is cautioned that the numbers in brackets refer to citations found in the list of references at the end of this appendix and not to the citations listed in Section 6, References, of the TER.



REQUEST FOR ADDITIONAL INFORMATION

EQUIPMENT ENVIRONMENTAL QUALIFICATION (EEQ) REVIEW OF LICENSEES' RESOLUTION OF OUTSTANDING ISSUES FROM NRC EQUIPMENT ENVIRONMENTAL QUALIFICATION SAFETY EVALUATION REPORTS (SER) AND TMI ACTION PLAN INSTALLED EQUIPMENT

Rochester Gas and Electric Corporation

R. E. Ginna Plant

NRC Docket No. 50-244

NRC TAC No. 42520

November 4, 1981

Rev. 1, January 13, 1982 Rev. 2, February 26, 1982

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BACKGROUND

Franklin Research Center (FRC) of Philadelphia, Pa. is providing assistance to the U.S. Nuclear Regulatory Commission (NRC) for the equipment environmental qualification (EEQ) review of operating reactors. FRC will perform an EEQ review of the Licensee's 90-day response to outstanding issues from the NRC Equipment Environmental Qualification Safety Evaluation Report (SER) and the installed TMI Action Plan equipment. The review will be limited to safety-related equipment potentially exposed to a harsh environment. The results will be presented in the form of a technical evaluation report for each plant.

This request for additional information is the result of an evaluation of the information provided by letters dated September 4, 1981 [1] and January 30, 1981 [2]*. FRC previously requested TMI Action Plan information by a telephone memorandum dated October 2, 1981 [3].

On November 6, 1981, RG&E Corporation transmitted detailed information of environmental qualification [6, 6.1, 6.2, 6.3, 6.3.1, 6.3.2, 6.3.3, 6.3.4, 6.3.5, 6.3.6, 6.3.6.1, 6.3.6.2, 6.3.6.3, 6.3.6.4]^{(1)**}

In addition, on November 25, 1981, FRC received from NRC information on environmental qualification [7].⁽¹⁾

In response to the FRC request for information, the Licensee, on February 18, 1982 [8], transmitted most of the information requested. The following RAI item remains to be addressed by the Licensee: A.1.d. Information pertaining to Item A.2 is contained in the February 8, 1982 cover letter [8].

*Numbers in brackets refer to citations found in the list of references. **Throughout the text, superscript numbers in parentheses indicate the revision in which the underlined material preceding the superscript was added.

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A. FRC REVIEW OF THE LICENSEE'S 90-DAY RESPONSE TO THE NRC EEQ SER

INFORMATION REQUESTED

- In reference to the Licensee's 90-day response [1] to the NRC SER [4], a legible single copy of each of the following qualification documents is requested in order that the FRC evaluation may proceed:
 - a. RG&E Reference 44, "Limit Switches," including the January 16, 1979 letter from L. D. White, Jr. to B. H. Grier (Reference 1, Attachment 2, para. 5.d).
 - b. SEP Review of Safe Shutdown Systems for the R. E. Ginna Nuclear Power Plant (Reference 1, Attachment 2, para. 12).
 - SEP Topic XV-6 (Reference 1, Attachment
 2, para. 12).
 - d. Letter, J. E. Maier to D. M. Crutchfield, dated Dec. 15, 1980 addressing concerns identified in TER Section 4.6.2 (Reference 1, Attachment 2, para. 29).
 - e. SEP Topic VIII-4 including transmittal letter, D. M. Crutchfield to J. E. Maier, dated March 30, 1981 (Reference 1, Attachment 2, para. 30).
 - f. A steam line break analysis which is a part of SEP Topics VI-2.d and VI-3 (Reference 1, Attachment 2, para. 33).
- Eleven equipment items have been defined [1] as equipment which will be replaced by June 1982. Identify the new equipment and supporting qualification documentation, if known, at this time. (Reference 1, Attachment 2, paragraphs 11.a, 11.c, 18, 23, 26, 27, 32, 35, 36, 37).

***This column will be completed by FRC as the requested information is received.

DATE RECEIVED BY FRC***

TER-C5257-454

B. FRC REVIEW OF INSTALLED TMI ACTION PLAN ITEMS

INFORMATION REQUESTED

DATE RECEIVED BY FRC***

- Reference 2 does not provide sufficient detail with respect to TMI Action Plan equipment installed as of 1/1/81.
 - a. The above-referenced submittal identifies five equipment items installed as of 1-1-81. Identify any additional TMI Action Plan equipment installed as of 1/1/81.
 - b. Identification of TMI Action Plan equipment installed with implementation dates after 1/1/81 is requested.
 - c. The correlation of these equipment items with the specific sections of NUREG-0737 [5] presented below (as applicable) is requested.

I1.E1.2, IIE.4.2, II.E3.1, II.G1, II.F2, II.D3, IIK3.12(Wx), IIK3.9(Wx), II.B3, IIE.4.1.

[The correlation is needed to ensure that all items are included in the review, e.g., if a transmitter is identified as a TMI Action Plan item, are the cable and terminal blocks associated with the device also identified?]

- d. For all installed TMI Action Plan <u>equipment</u> identified, a System Component Evaluation Worksheet (SCEW) (in accordance with 79-01B format or equivalent) is requested. This should include such things as equipment location, operating time, normal and accident environments, if different from previous values.
- e. The approximate installation date for the TMI Action Plan equipment items is requested so that the appropriate qualification criteria (NUREG-0588 or DOR Guidelines) can be used in the EEQ evaluation.

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DATE RECEIVED BY FRC***

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- 2. The qualification documents, if new or different from previous submittals, e.g., the actual test reports and associated correspondence cited as evidence of qualification listed on the SCEW sheets, for all identified TMI Action Plan equipment are requested. [The identification of those reports considered to be proprietary is requested so that proper control of documents can be maintained.]
- 3. Where the Licensee has a standard Owners' Group position with respect to a NUREG-0737 technical area or has requested extensions of implementation dates, this information is requested in order to incorporate it into the review.

11-6-81 [6](1)

- C. INSTRUCTIONS FOR TRANSMITTING INFORMATION REQUESTED
- The schedule for completion of the FRC assignment requires that the Licensee provide the requested information within 3 weeks of the date of the RAI.
- 2. The Licensee may transmit the requested information as follows:
 - o complete package directly to the NRC project manager

or

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 copy of cover letter to NRC project manager and complete package to FRC.

REFERENCES

 J. E. Maier Letter to D. M. Crutchfield (NRC) Subject: Environmental Qualification of Safety Related Electrical Equipment, R.E. Ginna (Response to NRC's SER and FRC TER-C5257-178) Rochester Gas & Electric Corp., 04-Sept-81

- 2. J. E. Maier Letter to D. G. Eisenhut (NRC) Subject: Environmental Qualification of Electrical Equipment, R.E. Ginna Nuclear Power Plant Rochester Gas & Electric Corp., 30-Jan-81
- 3. Telephone Memorandum From C. J. Crane (FRC) to G. Robel, P. Wilkinson Subject: Request for TMI Action plan information 02-Oct-81
- Office of Nuclear Reactor Regulation Safety Evaluation Report for R.E. Ginna Plant; Environmental Qualification of Safety-Related Electrical Equipment NRC, 01-June-81
- NUREG-0737, "Clarification of TMI Action Plan Requirements" NRC, November 1980
- 6. J. E. Maier Letter to D. M. Crutchfield (NRC) Subject: Environmental Qualification of Electrical Equipment, R. E. Ginna Nuclear Power Plant; Submittal of Information for FRC Re iew Rochester Gas & Electric Corp., 06 Nov-81⁽¹⁾
 - 6.1 C. J. Reinhardt Environmental Qualification Report on Pressurizer Safety Valve Position Indication System, Ginna Station; Direct Indication of Valve Position Rochester Gas & Electric Corp., 31-Oct-80⁽¹⁾
 - 6.2 J. J. Patsey and E. L. Solem Tests of Limit Switch #138-90 Acme Cleveland Dev. Co., 15-Feb-80 T.R. 3613-PP⁽¹⁾

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6.3 E. J. Namiotko

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Qualification Test Report for IEEE Class Class lE Solenoid Valves Valcor Engineering Corp., 05-Jul-79 QR52600-5940-2, Proprietary⁽¹⁾

6.3.1 M. M. Gillen

Seismic Vibration Test Program Performed on Three Solenoid Valves, Part Numbers V52600-5940-2A, V52600-6042-1 and V52600-5291-2, Serial Numbers 20, 24 and 8 Dayton T. Brown, 03-Oct-79 DTB04R79-0765, Rv⁽¹⁾

6.3.2 E. J. Namiotko Report on the Thermal and Radiation Effects on P-33310 Carbon Compound Valcor Engineering Corp., 09-Jan-79(1)

5.3.3 E. J. Namiotko Establishing a Thermal Aging Rate for Non-Metallic Materials Used in the Construction of Solenoids Valves Valcor Engineering Corp., 23-Apr-79 MR 52600-515-2(1)

6.3.4 D. Groves Letter to B.

Letter to B. J. Quail, Valcor. Subject: Test Summary of a Life Cycle Test on a Pilot Assist Valve V54000-30 Combustion Engineering, Inc., 08-Apr-74(1)

6.3.5 E. J. Namiotko

Bi-Axial Sinusoidal Seismic Qualification Test Procedure Valcor Engineering Corp., 26-Sep-78 S-1424, Rev. A, GEN/TR/Valcor Fn⁽¹⁾

6.3.6 E. J. Namiotko Qualification Test Report for IEEE Class IE Solenoid Valve R/N V52600-515, Valve Type I Valcor Engineering Corp., 03-Apr-79 GR52600-515, Rev. A⁽¹⁾

6.3.6.1 S. J. Franklin

Seismic Vibration Test Program Performed on One Solenoid Valve, Part Number V52600-515 Dayton T. Brown, 20-Jun-77 DTB04R77-0848(1)

| 6.3.6.2 | N. M. Burstein |
|------------|---|
| | Radiation Exposure and Simulated LOCA/DBE |
| | Isomedix Inc., 00-Aug-77 |
| | IFR-V877-01(1) |
| 6.3.6.3 | General Test Procedure for Nuclear Solenoid |
| | Valves |
| | Valcor Engineering Corp., 27-Sep-77 |
| | S-1602, Rev. F(1) |
| 6.3.6.4 | General Qualification Test Procedure for Class |
| | 1E Nuclear Service Valves |
| | Valcor Engineering Corp., 21-Sep-77 |
| | S-1410, Rev. E(1) |
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