



OFFICE OF THE SECRETARY

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

June 25, 1982

ACTION - Minogue Cys: Dircks Cornell Rehm Aggarwal Denton DeYoung GCunningham Felton Philips Besaw Woolley

MEMORANDUM FOR: William J. Dircks, Executive Director for Operations Leonard Bickwit, Jr., General Counsel FROM: Samuel J. Chilk, Secretary SUBJECT: SECY-82-207/82-207A - FINAL RULE, "ENVIRONMENTAL QUALIFICATION OF SAFETY-RELATED ELECTRIC EQUIPMENT FOR NUCLEAR POWER PLANTS"

The Commission has agreed that the final rule (SECY-82-207) should be revised as indicated below and should be returned to the Commission:

- 1. The title of the rule should be changed to "Environmental Qualification of Electric Equipment Important to Safety for Nuclear Power Plants." The second paragraph on page 5 should therefore be: "The scope of the final rule covers that portion of equipment important to safety commonly referred to as 'safety-related' (which the Commission interprets as essentially 'Class 1E' equipment defined in IEEE-323-1974) and some additional non-Class 1E equipment and systems whose failure under extreme environmental conditions could prevent the satisfactory accomplishment of safety functions by accident mitigating equipment." 2. On page 16, change section (c) to (c)(ii) and add a preceding section (c)(i) to read as follows: (c)(i) Electric equipment important to safety consists of safety-related and any additional electric equipment and systems that are essential to emergency reactor shutdown, containment isolation, reactor core cooling, and containment and reactor heat removal or that are otherwise essential in preventing significant release of radioactive material to the environment. 3. The qualification requirements for replacement parts should be codified in the final rule. You should provide the Commission with two options: (i) replacement of parts "in kind" (with an identical part) or with upgraded parts: (ii) as in (i) with a deadline after which replacement would require the use of upgraded parts.

4. Other than explicitly provided in this SRM, the rule should assure that there is no relaxation of requirements contained in the Commission Memorandum and Order CLI-80-21 of May 23, 1980.
5. NTOL plants including Commanche Peak and later plants should be clearly required to meet the Category I requirements of NUREG-0588.
6. The final rule should include an option that would require equipment inside containment, that is needed to go to cold shutdown, to be environmentally qualified. (This should be limited to environmental qualification and does not include those additional steps, e.g., redundancy, that would normally be required to qualify to Class 1E standards. It is understood that USI Task A-45 is addressing the broader issue of the qualification requirements of shutdown decay heat removal. There is also information available that indicates at least some plants reported under I&E Bulletin 79-01B, Supplement 2, September 30, 1980 that they have environmentally qualified this equipment. The Commission would like a summary of those plants which indicated in response to this bulletin that they have in fact qualified this equipment.)
7. The revised rule should also address Commissioners' comments during the briefing on June 4, 1982, some of which may have been incorporated in SECY-82-207A. The Commission requests that the staff expedite these revisions.
(EDO) (SECY SUSPENSE: 7/19/82)

cc: Chairman Palladino
Commissioner Gilinsky
Commissioner Ahearne
Commissioner Roberts
Commissioner Asselstine
Commission Staff Offices