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1/24/84

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION 84 FEB -6 P1:04

ATOMIC SAFETY AND LICENSING BOARD

BEFORE ADMINISTRATIVE JUDGES

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Lawrence Brenner, Chairman  
Dr. Richard F. Cole  
Dr. Peter A. Morris

In the Matter of : Docket Nos. 80-352-OL  
PHILADELPHIA ELECTRIC COMPANY : 80-353-OL  
(Limerick Generating Station, :  
Units 1 and 2) :

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INTERROGATORIES  
OF THE  
CITY OF PHILADELPHIA  
TO THE  
NUCLEAR REGULATORY COMMISSION TECHNICAL STAFF

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Kindly respond to the following requests as they apply to the Nuclear Regulatory Commission's ("NRC") review of the environmental qualification of equipment at the Limerick Nuclear Generating Station.

22. Did the NRC request a list from PECO of all systems and components important-to-safety? If yes, please provide the response.

23. Has the NRC determined that PECO is using the proper definitions of safety-related and important-to-safety in their Environmental Qualification program and classification of structures, systems, and components?

24. What review did the NRC perform of the Appendix A list in the LGS Environmental Qualification program for:

- a. completeness
  - b. accuracy
  - c. correct use of safety classification terms and definitions
25. a. Has the Staff concluded that PECO has properly considered

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all important-to-safety equipment.

b. If yes, provide the basis.

26. Have you requested that PECO provide a list of all important-to safety equipment which is subject to a harsh environment during an accident for which exception is taken with respect to that harsh environment? If yes, provide a copy of their response. If no, explain the basis for concluding PECO complies with 10 CFR §50.49.

27. Did the Staff review the basis for exclusions from the Q List of items important-to safety and in a harsh environment but not qualified? Describe the review performed.

28. Has the NRC accepted the exceptions PECO is taking to installing the Regulatory Guide 1.97, Rev. 2 equipment? If so, please identify all equipment PECO is not installing and the NRC's basis for accepting this position.

29. Has the NRC reviewed the alternate equipment used instead of Regulatory Guide 1.97, Rev. 2 equipment for adequacy in the Environmental Qualification program?

a. If yes, provide the basis for acceptance of each piece of alternate equipment.

b. If no, provide the basis for not conducting such a review.

30. Kindly provide any actions the NRC Staff has taken to insure that LGS equipment operability is not impaired due to

a. qualification methodology shortcomings;

b. design bases shortcomings;

c. inadequate equipment.

Reference: Environmental Qualification Briefing of Chairman By Sandia (Board Notification - 84-044), January 5, 1984.

Dated: February 3, 1984