

review the additional analyses or documentation, we discussed how analysis was being used to resolve deficiencies identified in the FRC TER, and the content of the additional documentation in order to determine the acceptability of these methods. The licensee's equipment environmental qualification files will be audited by the staff during follow-up inspections to be performed by Region 3, with assistance from IE Headquarters and NRR staff as necessary. Since a significant amount of documentation has already been reviewed by the staff and Franklin Research Center, the primary objective of the file audit will be to verify that they contain the appropriate analyses and other necessary documentation to support the licensee's conclusion that the equipment is qualified. The inspections will verify that the licensee's program for surveillance and maintenance of environmentally qualified equipment is adequate to assure that this equipment is maintained in the as analyzed or tested condition. The method used for tracking periodic replacement parts, and implementation of the licensee's commitments and actions, e.g., regarding replacement of equipment, will also be verified.

Based on our discussions with the licensee and our review of its submittal, we find the licensee's approach for resolving the identified environmental qualification deficiencies acceptable.

Compliance With 10 CFR 50.49

In its November 23, 1983 submittal, the licensee has described the approach used to identify equipment within the scope of paragraph (b)(1) of 10 CFR 50.49, equipment relied upon to remain-functional during and following design basis events. The licensee states that the flooding and environmental effects resulting from all postulated design-basis accidents documented in Chapter 14 of the PBNP Final Safety Analysis Report (FSAR), including the Loss-of-Coolant Accident (LOCA) and the Steam-Line Break Accident (SLBA) inside containment, were considered in the identification of safety-related electrical equipment which was to be environmentally qualified. The flooding and environmental effects resulting from High-Energy Line Breaks (HELBs) outside containment, as documented in Appendix E of the FSAR, were also considered in the identification of this equipment. The effects of flooding outside containment from sources other than HELBs were analyzed at PBNP in 1975 as documented in letters to the NRC dated February 17 and October 24, 1975, regarding "Potential for Flooding of Safety-Related Equipment." Certain protective measures implemented at that time, including erection of barrier walls, preclude

item by item basis with the licensee during the October 13, 1983 meeting. Replacing, shielding or exempting equipment, for an acceptable reason, are clearly acceptable methods for resolving environmental qualification deficiencies. The more lengthy discussions with the licensee concerned the use of additional analyses or documentation. Although we did not review the additional analyses or documentation, we discussed how analysis was being used to resolve deficiencies identified in the FRC TER, and the content of the additional documentation in order to determine the acceptability of these methods. The licensee's equipment environmental qualification files will be audited by the staff during follow-up inspections to be performed by Region 3, with assistance from IE Headquarters and NRR staff as necessary. Since a significant amount of documentation has already been reviewed by the staff and Franklin Research Center, the primary objective of the file audit will be to verify that they contain the appropriate analyses and other necessary documentation to support the licensee's conclusion that the equipment is qualified. The inspections will verify that the licensee's program for surveillance and maintenance of environmentally qualified equipment is adequate to assure that this equipment is maintained in the as analysed or tested condition. The method used for tracking periodic replacement parts, and implementation of the licensee's commitments and actions, e.g., regarding replacement of equipment, will also be verified.

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