

November 23, 1983

Note to: Joe Scinto

From: Mary E. Wagner *MW*

SUBJECT: SUSQUEHANNA *9*

This proposed amendment would change the deadline for environmental qualification of certain equipment at Susquehanna-1. The proposed deadline would require environmental qualification of this equipment in two years or by the end of the first refueling outage after the NRC arriving at a position on how to qualify the equipment, whichever is later. Thus, the question arises as to whether the proposed deadline is consistent with 10 CFR § 50.49(g).

The particular equipment qualifications here relate to an SDV pipe break environment. It appears that an SDV pipe break environment is beyond design basis for Susquehanna-1, and thus would not have to be environmentally qualified in accordance with the deadlines in § 50.49. Rick Lobel, the staff reviewer, has confirmed to me that an SDV pipe break is not defined as a design-basis event.

As best as I can piece together the history of the existing license condition, it arose out of NUREG-0803, "General Safety Evaluation Report Regarding Integrity of BWR Scram System Piping." NUREG-0803 in a sense skirted the issue, by not saying that SDV pipe breaks were design basis but saying at the same time that they were of a sufficiently high degree of probability such that some equipment might have to be changed.

On July 1, 1982 the Staff informed PP&L that equipment essential to shutdown of the plant and mitigation of SDV pipe break should be included in the equipment qualification program. (See SSER, Supp. 3, p. 4-11). PP&L agreed to do this (Id.; see also PP&L letter to Staff of September 17, 1981 and PP&L letter to Staff of December 29, 1983 (¶ 12)). These documents are attached to my note for your reference. This commitment was then incorporated as a license condition. The basis for the present deadline probably is that the qualification was to be accomplished as part of PP&L's equipment qualification program.

By way of further background, PP&L, as a member of the BWR owners group, has submitted a report to the Staff on the probability of an SDV break (which the Staff has not found adequate in and of itself to show that the equipment does not have to be environmentally qualified) and is doing further study in an attempt to remove this license condition entirely.

Under these circumstances, as long as the Staff maintains that an SDV break is not a design basis accident, an extension of the environmental qualification date would seem to fall outside the restrictions of § 50.49(g). I concur, with noted changes to the package.

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PDR FOIA  
ADAT084-166 PDR

Mary E. Wagner



NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

EQUIPMENT DATE: DATE RECEIVED TASK BASIS NO:  
11/03/83 669052

PENDING BEFORE:  
FACILITY: (05000347) SIKOLITHANNA J

REFERRED TO:

RECEIVED:

Scinto  
Wray

11/23

11/03/83

J. Thomas for G. Gray

11/3/83

11/23 per Bob Perch (P.M.) - mem  
to provide add'l background

OK mem  
11/23

Joe - as you can see from Perch's Nov. 3 note to you, he does not believe that the change covered by the requested amendment is covered by the requirements of 10 CFR § 50.49(g). Perch thinks this makes the "open-ended" deadline OK.

I discussed the prior package w. Scinto (while you were away). Scinto says that if it's not covered by § 50.49 it should not have been imposed as a requirement in the first place; he also says (without looking at the p k g e) that it probably is covered by 50.49(g) and therefore can't be extended the way Perch proposes. When Perch asked what he could do to resolve this seeming impasse, I couldn't really help him (Joe says we either hold lic. to the deadline, or we remove the requirement entirely). Let's talk about it. Mary



UNITED STATES  
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Mary:

I guess what we need from Perch is a demonstration as to why 50.49(g) doesn't apply. If he can clearly demonstrate that, then he must show why this particular requirement/deadline was imposed (i.e. what was it in the OL review that made the staff require this equipment to be qualified & what was the basis for the present deadline). If there is a national basis, then the requirement was properly imposed and can be properly modified.

If he can't demonstrate that 50.49(g) doesn't apply, then it must apply and the extension of the deadline may only be in accord w/ 50.49(g).

Check with Perch on this stuff.

JG

ASB  
1/11/82

Norm  
7790<sup>m</sup>