

SAFETY EVALUATION REPORT
OFFICE OF NUCLEAR REACTOR REGULATION
EQUIPMENT QUALIFICATION BRANCH
DAVIS BESSE UNIT 1
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ENVIRONMENTAL QUALIFICATION OF ELECTRIC EQUIPMENT IMPORTANT TO SAFETY

INTRODUCTION

Equipment which is used to perform a necessary safety function must be demonstrated to be capable of maintaining functional operability under all service conditions postulated to occur during its installed life for the time it is required to operate. This requirement, which is embodied in General Design Criteria 1 and 4 of Appendix A and Sections III, XI, and XVII of Appendix B to 10 CFR 50, is applicable to equipment located inside as well as outside containment. More detailed requirements and guidance relating to the methods and procedures for demonstrating this capability for electrical equipment have been set forth in 10 CFR 50.49, "Environmental Qualification of Electric Equipment Important to Safety for Nuclear Power Plants," NUREG-0588, "Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment" (which supplements IEEE standard 323 and various NRC Regulatory Guides and industry standards), and "Guidelines for Evaluating Environmental Qualification of Class IE Electrical Equipment in Operating Reactors" (DOR Guidelines).

BACKGROUND

On February 8, 1979, the NRC Office of Inspection and Enforcement (IE) issued to all licensees of operating plants (except those included in the systematic evaluation program (SEP)) IE Bulletin (IEB) 79-01, "Environmental Qualification of Class IE Equipment." This Bulletin, together with IE Circular 78-08 (issued on May 31, 1978), required the licensees to perform reviews to assess the adequacy of their environmental qualification programs.

On January 14, 1980, NRC issued IEB 79-01B which included the DOR Guidelines and NUREG-0588 as attachments 4 and 5, respectively. Subsequently, on May 23, 1980, Commission Memorandum and Order CLI-80-22 was issued and stated that the DOR Guidelines and portions of NUREG-0588 form the requirements that licensees must meet regarding environmental qualification of safety-related electrical equipment in order to satisfy those aspects of 10 CFR 50, Appendix A, General Design Criterion (GDC) 4. Supplements to IEB 79-01B were issued for further clarification and definition of the staff's needs. These supplements were issued on February 29, September 30, and October 24, 1980.

In addition, the staff issued orders dated August 29, 1980 (amended in September 1980) and October 24, 1980 to all licensees. The August order required that the licensees provide a report, by November 1, 1980, documenting the qualification of safety-related electrical equipment. The October order required the establishment of a central file location for the maintenance of all equipment qualification records. The central file was mandated to be established by December 1, 1980. The staff subsequently issued a Safety Evaluation Report (SER) on environmental qualification of safety-related electrical equipment to the licensee on June 5, 1981. This SER directed the licensee 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 (requalification, replacement (etc.))." The licensee was required to respond to NRC within 90 days of receipt of the SER. In response to the staff SER issued in 1981, the licensee submitted additional information regarding the qualification of safety-related electrical equipment. This information was evaluated for the staff by the Franklin Research Center (FRC) in order to: 1) identify all cases where the licensee's response did not resolve the significant qualification issues, 2) evaluate the licensee's qualification documentation in accordance with established criteria to determine which equipment had adequate documentation and which did not, and 3) evaluate the licensee's qualification documentation for safety-related electrical equipment located in harsh environments required for TMI Lessons Learned Implementation. A Technical Evaluation Report (TER) was issued by FRC on January 11, 1983. A Safety Evaluation Report was subsequently issued to Toledo Edison on February 8, 1983 with the FRC TER as an attachment.

A final rule on environmental qualification of electric equipment important to safety for nuclear power plants became effective on February 22, 1983. This rule, Section 50.49 of 10 CFR 50, specifies the requirements of electrical equipment important to safety located in a harsh environment. In accordance with this rule, equipment for Davis Besse Unit 1 may be qualified to the criteria specified in either the DOR Guidelines or NUREG-0588, except for replacement equipment. Replacement equipment installed subsequent to February 22, 1983 must be qualified in accordance with the provisions of 10 CFR 50.49, using the guidance of Regulatory Guide 1.89, unless there are sound reasons to the contrary.

A meeting was held with each licensee of plants for which a TER had been prepared for the staff by FRC in order to discuss all remaining open issues regarding environmental qualification, including acceptability of the environmental conditions for equipment qualification purposes, if this issue had not yet been resolved. On December 13, 1983, a meeting was held to discuss Toledo Edison's proposed method to resolve the environmental qualification deficiencies identified in the February 8, 1983 SER and January 11, 1983 FRC TER. Discussions also include Toledo Edison's general methodology for compliance with 10 CFR 50.49, and justification for continued operation for those equipment items for which environmental qualification is not yet completed. The minutes of the meeting and proposed method of resolution for each of the environmental qualification deficiencies are documented in the April 3, 1984 submittal from the licensee.

EVALUATION

The evaluation of the acceptability of the licensee's electrical equipment environmental qualification program is based on the results of an audit review performed by the staff of: (1) the licensee's proposed resolutions of the environmental qualification deficiencies identified in the February 8, 1983 SER and January 11, 1983 FRC TER; (2) compliance with the requirements of 10 CFR 50.49; and (3) justification for continued operation (JCO) for those equipment items for which the environmental qualification is not yet completed.

Proposed Resolutions of Identified Deficiencies

The proposed resolutions for the equipment environmental qualification deficiencies, identified in the February 8, 1983 SER, and the FRC TER enclosed with it, are described in the licensee's April 3, 1984 submittal. During the December 13, 1983 meeting with the licensee, the staff discussed the proposed resolution of each deficiency for each equipment item identified in the FRC TER and found the licensee's approach for resolving the identified environmental qualification deficiencies acceptable. The majority of deficiencies identified were documentation, similarity, aging, qualified life and replacement schedule. All open items identified in the SER dated February 8, 1983 were also discussed and the resolution of these items has been found acceptable by the staff.

The approach described by the licensee for addressing and resolving the identified deficiencies includes replacing equipment, performing additional analyses, utilizing additional qualification documentation beyond that reviewed by FRC, obtaining additional qualification documentation and determining that some equipment is outside the scope of 10 CFR 50.49, and therefore not required to be environmentally qualified, e.g., located in a mild environment. We discussed the proposed resolutions in detail on an item by item basis with the licensee during the December 13, 1983 meeting. Replacing 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 III, 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 environmental 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 April 3, 1984 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 prepared its Master List based on a review of the Design Basis Events (LOCA/HELB) and those systems required for initiating protective actions, mitigating the consequences of the event and monitoring of the event.

The methodology utilized to create the Master List at Davis Besse ensures that all equipment required for initiating protective actions, mitigating the consequences of the event, and monitoring of the event is included. Therefore, Davis Besse Judges its EQ Manual Master List addresses all electrical equipment within the scope of the rule (10CFR50.49).

The flooding and environmental effects resulting from all postulated design-basis accidents including the loss-of-coolant accident (LOCA) and High Energy Line Break accident (HELB) inside containment and the flooding and environmental effects resulting from HELBs outside containment were considered when identifying safety-related electrical equipment at Davis-Besse Unit 1 which was to be environmentally qualified. FSAR section 15.4 discusses the design basis accident considered and FSAR section 3.00 provides a discussion of the Environmental Design of Electrical Equipment.

The licensee's approach for identifying equipment within the scope of paragraph (b)(1) is in accordance with the requirements of that paragraph, and therefore acceptable.

The method used by the licensee for identification of electrical equipment within the scope of paragraph (b)(2) of 10 CFR 50.49, nonsafety-related electric equipment whose failure under postulated environmental conditions could prevent satisfactory accomplishment of safety functions, is summarized below:

1. A list of safety related systems required to achieve safe shutdown or accident mitigation was developed. Any systems or equipment which were support systems (i.e. mechanically connected or auxiliary systems) which are necessary for the required operation of the safety related equipment was included. This was determined by review of the FSAR and the Davis Besse Unit 1 Piping and Instrumentation diagrams (P&IDs).
2. From these systems determined in step 1, a list was generated of safety-related electrical equipment as defined in paragraph (b)(1) of 10 CFR 50.49 required to remain functional during or following design-basis Loss of Coolant Accident (LOCA) or High Energy Line Break (HELB) Accidents. The LOCA/HELB accidents are the only design-basis accidents which result in significantly adverse environments to electrical equipment which is required for safe shutdown or accident mitigation. The list was based on reviews of the Davis Besse Final Safety Analysis Report, Technical Specifications, Emergency Operating Procedures, Piping and Instrumentation Diagrams (P&IDs), and electrical distribution diagrams.
3. The elementary wiring diagrams of the safety-related electrical equipment previously identified in Step 1 were reviewed to identify any auxiliary devices electrically connected directly into the control or power circuitry of the safety-related equipment whose failure due to postulated environmental conditions could prevent the required operation of the safety-related equipment.

4. Nonsafety-related electrical circuits indirectly associated with the electrical equipment identified in Step 2 by common power supply or physical proximity were considered in the original DB-1 electrical design including the use of applicable industry standards (e.g., IEEE, NEMA, ANSI, UL, and NEC) and the use of properly coordinated protective relays, circuit breakers, and fuses for electrical circuit fault protection (Ref. FSAR chap. 8).

We find the methodology used by the licensee is acceptable since it provides reasonable assurance that equipment within the scope of paragraph (b)(2) of 10 CFR 50.49 has been identified.

With regard to paragraph (b)(3) of 10 CFR 50.49, the licensee is presently undergoing a R.G. 1.97 review in conjunction with the B&W Owners Group. This effort is part of the overall Emergency Response Capability Program (Generic Letter 82-33).

The schedule for implementing any R.G. 1.97 modifications will be addressed in the response to Generic Letter 82-33.

Any changes resulting from the licensee's R.G. 1.97 review, and the associated qualification data will be incorporated in the EQ Manual as part of the normal facility changes request closeout process following installation. Those RG 1.97 items already installed have been included in the EQ Manual. The staff review for R.G. 1.97 conformance may result in the licensee being required to include additional equipment in its environmental qualification program.

We find the licensee's approach to identifying equipment within the scope of paragraph (b)(3) of 10 CFR 50.49 acceptable since it is in accordance with the requirements of that paragraph.

Justification for Continued Operation

The licensee has provided, in its April 3, 1984 submittal, justification for continued operation addressing each item of equipment for which the environmental qualification is not yet completed (see enclosure for the JCO equipment list).

We have reviewed each JCO provided by the licensee in its April 3, 1984 submittal and find them acceptable since they are based on essentially the same criteria that were used by the staff and its contractor to review JCO's previously submitted by licensees. These criteria, listed below, are also essentially the same as those contained in 10 CFR 50.49(i).

- a. The safety function can be accomplished by some other designated equipment that is qualified, and failure of the principal equipment as a result of the harsh environment will not degrade other safety functions or mislead the operator.
- b. Partial test data that does not demonstrate full qualification, but provides a basis for concluding the equipment will perform its function. If it can not be concluded from the available data that the equipment will not fail after completion of its safety function, then that failure must not result in significant degradation of any safety function or provide misleading information to the operator.
- c. Limited use of administrative controls over equipment that has not been demonstrated to be fully qualified. For any equipment assumed to fail as a result of the accident environment, that failure must not result in significant degradation of any safety function or provide misleading information to the operator.

By letter dated October 10, 1984 (No. 1089), Toledo Edison Company filed a request for an extension of the schedular requirement of 10 CFR 50.49(g) for the two lube oil pump AC motors for the High Pressure Injection Pumps. A Justification for Continued Operation (JCO) for these pump motors was provided in Toledo Edison Company's submittal dated October 12, 1981 (No. 750) and reconfirmed in the licensee's letter dated May 20, 1983 (No. 951). The licensee has stated that this JCO remains valid for the extended period.

The licensee stated by telecon on November 7, 1984 that all electrical equipment, with the exception of the two lube oil pumps, will be qualified by the end of the 1984 refueling outage.

CONCLUSIONS

Based on the above evaluation, we conclude the following with regard to the qualification of electric equipment important to safety within the scope of 10 CFF 50.49.

- ° Toledo Edison's electrical equipment environmental qualification program complies with the requirements of 10 CFR 50.49.
- ° The proposed resolutions for each of the environmental qualification deficiencies identified in the February 8, 1983 SER and FRC TER are acceptable.
- ° Continued operation until completion of the licensee's environmental qualification program will not present undue risk to the public health and safety.

Justification For Continued Operation Equipment List

<u>TED</u>	<u>NRC</u>	
<u>Tag. No</u>	<u>TER No.</u>	<u>Description</u>
MP1981	73	Prestolite Leland AC Pump motor
MP1971	74	Prestolite Leland AC Pump Motor