



GPU Nuclear Corporation
One Upper Pond Road
Parsippany, New Jersey 07054
201-316-7000
TELEX 136-482
Writer's Direct Dial Number:

February 4, 1988
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U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Three Mile Island Nuclear Generating Station, Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Use of Seismic Experience Data for Future Replacement Components

The purpose of this letter is to notify NRC of GPUN's plans to utilize seismic experience data, as an acceptable alternative to existing analytical or test methodologies, to demonstrate seismic adequacy of future replacement components and sub-components contained within the "Class of 20" equipment listed in Table 3-1 of the Seismic Qualification Utility Group (SQUG) Generic Implementation Procedure (GIP) for Seismic Verification of Nuclear Plant Equipment, dated December 4, 1987 (Draft).

NRC Generic Letter 87-02, dated February 19, 1987, endorses the use of A-46 criteria and methods for demonstrating seismic adequacy of future replacement components. Application of seismic experience data for the specified list of twenty (20) equipment classes has completed NRC and Senior Seismic Review and Advisory Panel (SSRAP) review and has been determined by the industry to be well founded. Therefore, we believe a case-by-case application of the seismic experience data for demonstrating seismic adequacy of such components used for future replacements is prudent at this time.

Use of seismic experience data for future replacement components will be implemented with appropriate procedures and controls. Each application will be documented and signed by individuals who are qualified in accordance with the GIP and appropriately trained. Characteristics or caveats describing the bounds of the data base for equipment classes are well known as delineated in the GIP and will be evaluated during the qualification process. Documentation and certification of seismic adequacy will be maintained for future reference.

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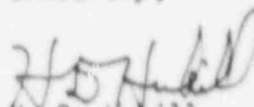
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This approach is consistent with the views expressed by NRC at the August 12 & 13, 1987 meeting with the Seismic Qualification Utility Group. If in the finalization of the GIP's any significant changes occur which could impact the seismic adequacy determination of previously reviewed components, GPUN will reevaluate the seismic status as appropriate.

Seismic qualification utilizing existing analytical or testing approaches will also be continued. The TMI-1 FSAR will be updated to indicate that seismic qualification is demonstrated with either existing analytical/test methods or by using seismic experience data.

We trust that this approach is acceptable. It is not our intent to provide further formal notification of the use of seismic experience data for future replacement components within the classes of equipment covered by the SQUG GIP.

Sincerely,



H. D. Hukill

Vice President and Director, TMI-1

HDH/DJD:fg

cc: J. Stolz, USNRC
W. T. Russell, USNRC Region I
R. Hernan, USNRC
R. Conte, USNRC TMI-1 Site
N. Anderson, USNRC