

MEMORANDUM FOR: Richard H. Vollmer, Deputy Director
Office of Inspection and Enforcement

FROM: Harold R. Denton, Director
Office of Nuclear Reactor Regulation

SUBJECT: EQUIPMENT QUALIFICATION ISSUES

We have reviewed the January 17, 1986 memorandum from Robert D. Martin which was enclosed with your January 22, 1986 memorandum to Darrell G. Eisenhower that requested our assistance on several issues raised by Mr. Martin. Our views follow.

We agree that the relationship between the environmental qualification status of equipment, the technical specification operability requirements, and the action period of the LCO, should be clearly presented. We believe that when qualified equipment is being identified in the technical specification, the first requirement should be that the equipment is qualified. Then and only then, are checks for functional operability appropriate. Qualification of equipment is a conservative inviolate cornerstone of equipment operability.

It is true that the increase in risk caused by a failure of a licensee to demonstrate environmental qualification is related to the probability of a harsh environment and the probability that the equipment will be required to operate. However, to preclude an endless debate about the degree of inoperability and when the inoperability commences should a harsh environment occur, we have taken the position that only qualified equipment may have an operability greater than zero in a harsh environment. This is an accepted conservatism.

From the previously stated philosophy, it is clear that we do not agree that it would be appropriate to permit a longer grace period (action period) under the LCO if equipment were declared inoperable because of a lack of prior environmental qualification.

I hope the above discussion of our views on your comments is helpful. Should you desire any additional perspective, please contact Martin Virgilio of Operating Reactors Assessment Staff.

Harold R. Denton, Director
Office of Nuclear Reactor Regulation

DISTRIBUTION YELLOW TICKET 869031 Central File w/incoming NSIC w/incoming
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

Central file

FROM: VOLLMER
TO: EISENHUT

ORIG. DUE DATE: 02/22/86 TICKET NO: 869031
DOC DATE: 01/22/86
NRR RCVD DATE: 01/24/86

** YELLOW **

FOR SIGNATURE OF: DENTON

DESC:
EQUIPMENT QUALIFICATION ISSUES

CC:
~~DENTON/EISENHUT~~
PPAS
MOSSBURG/TOMS

REFERRED TO: DRAS 012486
CONTACT: HOLAHAN

*Please move on this one promptly - in
concert with other Div reps.*

*DE
1/24*

PLEASE REVIEW THE DUE DATE IMMEDIATELY:

IF THE DUE DATE DOES NOT ALLOW ADEQUATE TIME TO RESPOND TO THIS TICKET, YOU MAY REQUEST A REVISED DUE DATE. THE REQUEST MUST INCLUDE A VALID JUSTIFICATION AND BE MADE THROUGH YOUR CORRESPONDENCE COORDINATOR TO THE NRR MAIL ROOM (DORIS MOSSBURG, -28970)

REQUESTS FOR REVISION OF YELLOW TICKET DUE DATES MAY BE MADE, WITH JUSTIFICATION, THRU THE WEEKLY WITS UPDATE UP TO ONE WEEK AFTER ASSIGNMENT BY NRR MAIL ROOM. THE NEW DUE DATE, IF APPROVED BY NRR MAILROOM, WILL BE USED TO TRACK DIVISION CORRESPONDENCE COMPLETION SCHEDULES.

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WITHOUT FIRST GOING THRU THE NRR MAIL ROOM.