



# Summary of Curtiss-Wright EQPS Comments on DG- 1361

for Docket NRC-2020-0245



*Rick Weinacht - May 13, 2021*



# Overview

- **Environmental Qualification (EQ) is an important component of ensuring plant safety and health and safety of the public. Safety objectives are mutually shared between vendors, test laboratories, licensees and the NRC. Clear, concise and transparent regulatory guidance founded in research and established standards and terminology support safety objectives.**
- **A revision to RG 1.89 is long overdue. The revision should recognize advances in the Joint Logo Standard (JLS) and conclusions of research conducted in the last 37 years.**
- **Comprehensive, updated NRC Inspector Guidance on EQ is long overdue. There seems to be a general lack of knowledge and recognition of the EQ Task Action Plan within NRC Staff**
  - Pilot CDBI Project Manager was unaware of the EQ TAP
  - EQ TAP is never mentioned in Inspector DBAI Training (352 Slides!)
  - Knowledge Management aspects of Programmatic Lessons Learned from EQ Inspections should include reasons for initiating the EQ TAP and conclusions of the research for each of the issues studied

# Overview

- **There is an over-emphasis within the NRC Staff and the regulatory guidance on calculated thermal qualified life and use of the Arrhenius methodology. The draft RegGuide should embrace and encourage condition-based qualification and condition and environmental monitoring consistent with the most significant finding of the programmatic review of the EQ TAP – lack of a programmatic feedback mechanism. As plants operate beyond 40 and 60 years more emphasis should be placed on an understanding of the condition of the equipment in the plant than on the precision of aging equivalency calculations.**
- **The Regulatory Guide should not try to conform the Joint Logo Standard to the regulation. It should provide guidance on how adhering to the JLS is an acceptable method of meeting the regulation.**

# Summary of Specific Comments

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- **Several regulatory positions recommended for deletion as currently worded:**

C.1.a, C.1.b, C.1.c, C.1.d, C.1.e, C.1.f, C.1.j.(3)

- **Eight areas were identified that need additional clarity or guidance:**
  - Definitions
  - Shelf Life vs. Qualified Life
  - Condition Based Qualification
  - Radiation Considerations and Beta Dose Reduction Methods
  - Acceptable Methods for Addressing Synergistic Effects
  - Acceptable Justification of Activation Energies
  - Selection of Aging Temperatures/Extrapolation
  - Ramp Rate and Double vs. Single Transient