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Subject: [External_Sender] NUGEQ's Concern with Generic Implications & Request for Clarification re Assessment of Performance Deficiency at Cooper as a § 50.49 NCV
Date: Thursday, December 19, 2024 1:21:28 PM
Attachments: 12-19-24 NUGEQ Ltr to NRC re Generic Implications of Cooper 50.49(f) NCV.pdf

The Nuclear Utility Group on Equipment Qualification (NUGEQ or Group) hereby submits this letter as a result of the Group's review of the "Green" Finding and NCV levied against Cooper Nuclear Station on November 5, 2024. Inspection Report 05000298/2024003 identified a performance deficiency associated with a violation of 10 C.F.R. 50.49, "*Environmental Qualification of Electric Equipment Important to Safety for Nuclear Power Plants*," for the licensee's failure to properly maintain environmental qualification of process line joints within the environmental qualification boundaries. Specifically, our concern centers on how the NCV expands the applicability of 10 C.F.R. 50.49 to include process line fittings to mechanical components that are beyond the connection interface with the EQ equipment.

It is NUGEQ's position that NCV 2024003-01 represents a new staff position that expands the equipment scope of the EQ final rule as defined by § 50.49(b). Without further clarification, the ramifications of this violation have the potential to significantly increase the scope of equipment subject to 10 CFR 50.49 by requiring the inclusion of mechanical equipment with NPT connections, including but not limited to: (1) Hydraulic Operated Valves; (2) Pneumatic lines associated with Air Operated Valves; (3) Manual vent and drain valves; (4) 3-valve or 5-valve manifolds; and (4) excess flow check valves.

Request for Clarification

Given the generic implications of NCV 2024003-01 citing the performance deficiency against § 50.49(f), the Group requests Staff clarification that § 50.49 does not apply to purely mechanical components (e.g., 3-valve manifolds, vent/drain valves, etc.) or their fittings, including any thread sealant, that are external to the connection interfaces of the electric or electro-mechanical equipment subject to § 50.49.

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