

March 29, 2001

MEMORANDUM TO: William D. Beckner, Acting Chief
Generic Issues, Environmental, Financial &
Rulemaking Branch
Division of Regulatory Improvement Programs, NRR

FROM: Joseph A. Golla, Project Manager/**RA**/
Generic Issues, Environmental, Financial &
Rulemaking Branch
Division of Regulatory Improvement Programs, NRR

SUBJECT: SUMMARY OF PUBLIC MEETING WITH NUCLEAR ENERGY
INSTITUTE (NEI) TO DISCUSS NEI EFFORTS SUPPORTING 10 CFR
50.49 "EQUIPMENT QUALIFICATION" ISSUES RELEVANT TO RIP 50
OPTION 2

On March 22, 2001, NRC met with NEI to discuss the industry's approach for addressing equipment qualification (EQ) treatment issues for RISC-3 structures, systems, and components (SSCs) within the risk-informing 10 CFR Part 50 (RIP50), Option 2, regulatory framework. A list of meeting attendees is attached.

NEI described three distinct replacement processes proposed for use under Option 2 for RISC-3 electrical equipment or components. They included processes for "identical replacement", "equivalent replacement", and a replacement process that would require a plant change modification package to support it (i.e., same "design function" but the replacement SSC is different in configuration or in other design details).

NEI stated that identical replacement, by definition, would consist of replacing components only with other identical components. Equivalent replacement would permit the replacement of components by other components that, although not entirely identical, are capable of performing the same function in the same way as the components they replace. This would be shown by doing an "equivalency evaluation." The last category is where the replacement electrical component requires analysis and perhaps testing (when data does not exist) to support the replacement because the replacement component is substantially different. Industry indicated that the engineering analysis would examine the critical aspects of the replacement component and whether the component would be expected to function under the design environment. The analysis would be based on test data, but would not require that the entire replacement component be tested as is typically done today under 50.49, or that the 50.49 documentation would be required.

NEI informed the staff that it planned to include additional information regarding its approach for addressing the treatment of RISC-3 SSCs with respect to EQ in a future revision of its Option 2 implementing guidance document (NEI 00-04).

Attachment: As stated

**NRC/NEI RIP 50 Option 2 Meeting
10 CFR 50.49 Initiatives
List of Attendees**

Name	Affiliation	e-mail	Phone
Tim Reed	NRC/NRR/DRIP	TAR@NRC.GOV	301-415-1462
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John Nakoski	NRC/NRR	JAN1@NRC.GOV	301-415-1278
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Mostafa Ahmed	Westinghouse	ahmedma@westinghouse.com	724-275-3663

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