



Carolina Power & Light Company

October 30, 1980

Mr. James P. O'Reilly
Director, Region II
U.S. Nuclear Regulatory Commission
101 Marietta St. N. W., Suite 3100
Atlanta, Georgia 30303

IE SUPPLEMENT NO. 2 TO BULLETIN 79-01B
ENVIRONMENTAL QUALIFICATION OF CLASS 1E EQUIPMENT

Dear Mr. O'Reilly:

Your letter of September 30, 1980 transmitted IE Supplement No. 2 to Bulletin 79-01B, which extensively revised and expanded the scope of the response to Bulletin 79-01B. Since the NRC had previously directed licensees to comply with commitment dates for 90-day reports that were prior to November 1, 1980, Supplement 2 is very inappropriate for licensees that abided by their commitments. For example, the Robinson Plant report was submitted in July and the original 90-day report for our Brunswick Plant was submitted in September, 1980. Thus, while Carolina Power & Light Company (CP&L) is making every effort to comply with the November 1, 1980 submittal date for information, because of the extensive revisions which were incorporated by the September 30, Supplement 2, we believe an extension in supplying the newly requested information is not only desirable, but essential. We understand that Supplement No. 3 to the Bulletin will include provisions for an extension.

A second concern raised by Supplement 2 is the Answer to Question 12, which states that equipment designed to perform its safety function within a short time into an event must be qualified for a period of at least 1 hour in excess of the time assumed in the accident analysis. This requirement was first published in NUREG 0588, and on May 23, 1980 the Commission ordered that the NUREG should form the partial requirements which licensees and applicants must meet in order to satisfy those aspects of 10CFR50, Appendix A, General Design Criteria. In our opinion, this is an arbitrary requirement without a justifying technical basis. The NRC has received negative comments on the NUREG document, which includes adverse comments on the 1 hour requirement, and has yet to respond to these comments. The NRC justification for this requirement, which is included in Answer 12 of the subject document, is based upon the acceptance of type tests for a single unit of equipment and the spectrum of accidents (small and large breaks) bounded by a single test. The historical basis for qualification by test has been a test of a single unit to verify that the type of equipment being tested is capable of performing its safety function in response to the particular accidents and time for which the equipment is required. For example, it

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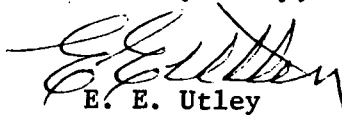
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is not reasonable to require 1 hour qualification tests for equipment which performs an isolation function in several minutes or less. It is requested, therefore, that the NRC reconsider the arbitrary 1 hour plus time requirement for equipment qualification. This requirement will cause additional expenditures for testing and equipment replacements which are not justifiable on the basis of a significant increase in plant safety.

We also are disconcerted to find the extensive revision of source term requirements contained in the Answer to Question 18, which revises the source term to reflect the TMI source term on all equipment. This is a major change in scope and policy, and not a clarification, as implied by the Supplement and is again a specific contravention of prior NRC staff statements on the issue of environmental criteria. It will not be possible to respond to this additional information by November 1, and we would hope the Commission will address this in Supplement No. 3, or in some other manner.

Yours very truly,



E. E. Utley
Executive Vice President
Power Supply and
Engineering & Construction

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