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 Document Control Branch (Document Control Desk)

SUBJECT: Informs that util interprets NRC 870428 grant of extension
 for response to Generic Ltr 87 02 to envelop all elements of
 seismic qualification util group.

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United States Nuclear Regulatory Commission
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EXTENSION OF THE 60-DAY REPORTING
PROVISIONS OF GENERIC LETTER 87-02

Gentlemen:

On February 19, 1987, the Nuclear Regulatory Commission (NRC) staff issued Generic Letter 87-02, "Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors, Unresolved Safety Issue (USI) A-46." In the Generic Letter, the staff requested that each licensee "provide within 60 days of receipt of this letter a schedule for implementation of the seismic verification program at your facility."

Utilities affected by this generic letter were concerned that a response within 60 days of the receipt of the letter would not be possible because the methodology for implementation was still under development. As a result, on April 10, 1987 the Seismic Qualification Utility Group (SQUG) submitted to NRC a request for extension on the time for licensee response to 60 days after the final availability of detailed generic guidance regarding implementation of the seismic verification program including issuance of the staff's generic Safety Evaluation Report (SER) approving the SQUG generic implementation program and resolution of outstanding issues associated with that SER. The SQUG indicated that upon availability of the guidance documents, licensees would be able to evaluate (1) the application of the program to their plants, (2) whether participation in the generic program is preferable, and (3) the schedule for implementation.

In its response to the SQUG (letter dated April 28, 1987), the NRC acknowledged that "it is appropriate to extend the 60-day reporting provisions of Generic Letter 87-02 for SQUG licensees until the generic implementation procedures are better defined and the trial plant reviews are completed." Carolina Power & Light Company believes that the extension will permit the development of an effective and prudent schedule.

Carolina Power & Light Company interprets the extension to envelop all the elements of the SQUG request. That is, CP&L will defer selecting either the generic or the individual utility option resolution until after availability of all the pertinent guidance.

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In addition, CP&L is reviewing the backfitting implications of Generic Letter 87-02 and reserves the right to contest the Staff's backfitting analysis at the conclusion of this review.

If you would like to discuss this interpretation, we would welcome the opportunity to meet with you and further present our concerns regarding this issue. In such case, please contact Mr. Pedro Salas at (919) 836-8015.

Yours very truly,



S. R. Zimmerman

Manager

Nuclear Licensing Section

PS/lah (5192PSA)

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