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 AUTH. NAME AUTHOR AFFILIATION  
 ZIMMERMAN, S. R. Carolina Power & Light Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 DENTON, H. R. Office of Nuclear Reactor Regulation, Director (post 851125)

SUBJECT: Requests mod to commitment to perform seismic qualification of equipment, per Reg Guide 1.97, using methodology applied in qualification of safety-related equipment under scope of USI A-46, instead of IEEE Std 344.

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Carolina Power & Light Company

SERIAL: NLS-86-174

JUN 27 1986

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
United States Nuclear Regulatory Commission  
Washington, DC 20555

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2  
DOCKET NOS. 50-325 & 50-324/LICENSE NOS. DPR-71 & DPR-62

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261/LICENSE NO. DPR-23

### SEISMIC QUALIFICATION OF RG 1.97 EQUIPMENT

Dear Mr. Denton:

Carolina Power & Light Company (CP&L) had originally planned to perform seismic qualification of new equipment to be installed at H. B. Robinson and Brunswick to meet the guidance of Regulatory Guide (RG) 1.97. The qualification would have been performed using the criteria of IEEE Standard 344.<sup>1</sup> However, in light of the Staff's proposed resolution to Unresolved Safety Issue (USI) A-46, *Seismic Qualification of Equipment in Operating Plants*, we would like to modify our commitment and perform the seismic qualification of the RG 1.97 equipment using the same methodology to be applied in the qualification of safety-related equipment under the scope of USI A-46.

### BASIS FOR THE REQUEST

CP&L had committed to qualify the RG 1.97 equipment using the IEEE Standard because it was the only NRC-recognized seismic criteria when the Staff's RG 1.97 recommendations were issued. However, on September 4, 1985 (50 FR 35884), the Staff proposed new qualification criteria for safety-related equipment in operating plants (i.e., NUREG-1030). This criteria is based on experience data collected by the Seismic Qualification Utility Group (SQUG) and recommendations made by the Senior Seismic Review Advisory Panel (SSRAP). We believe that use of experience data is an acceptable qualification method for new equipment to be installed in operating plants if the equipment is enveloped by the equipment classes for which seismic experience data is applicable.

Our views are consistent with the Staff's; during meetings with the ACRS (January 15, 1986) and with SQUG (April 29 and 30, 1986), the Staff agreed with industry comments to NUREG-1030 which indicated that replacement equipment installed in operating plants should be allowed to meet USI A-46 seismic requirements as an alternative to meeting current criteria for seismic qualification, including equipment which may fall outside the USI A-46 scope such as RG 1.97 or other plant upgrades.

1/ Commitments identified in CP&L letters dated December 31, 1984, *H. B. Robinson Response to Order Confirming Commitments on Emergency Response Capability* (NLS-84-509) and February 1, 1984, *Brunswick - Emergency Response Capability, Regulatory Guide 1.97, Revision 1* (NLS-84-025).

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Charlotte Street • P. O. Box 1551 • Raleigh, N. C. 27602

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### SPECIFICS OF THE REQUEST

CP&L would like to perform the seismic qualification of RG 1.97 equipment using the USI A-46 criteria, with qualification to be performed upon NRC approval of the methodology. This requires an extension in the qualification schedule for RG 1.97 equipment until NRC completes its review. Qualification work would then be performed in parallel with the USI A-46 equipment. Although the RG 1.97 equipment would not be included in the USI A-46 list of equipment, CP&L would follow the same qualification schedule. If once developed, the USI A-46 criteria should not envelope all items, any outliers would be qualified to the previous commitment.

We request that the Staff provide us with prompt feedback to allow us to properly schedule the work. We would appreciate your concurrence by August 31, 1986.

If you have any questions, please contact Mr. Pedro Salas at (919) 836-8015.

Yours very truly,



S. R. Zimmerman  
Manager

Nuclear Licensing Section

PS/pgp (3911PSA)

cc: Mr. N. Anderson (NRC)  
Dr. J. Nelson Grace (NRC-RII)  
Me. T. Y. Chang (NRC)  
Mr. W. H. Ruland (NRC-BNP)  
Mr. G. Requa (NRC)  
Mr. H. Krug (NRC Resident Inspector - RNP)  
Mr. E. Sylvester (NRC)