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RECIP.NAME RECIPIENT AFFILIATION
EISENHUT,D.G. Division of Licensing

SUBJECT: Responds to NRC preliminary evaluation of response to IE Bulletin 79-10B, "Environ Qualification of Class IE Equipment." Systematic rejection of work on IE Bulletins 79-01,79-01B & suppls found disturbing.

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FLORIDA POWER & LIGHT COMPANY

May 28, 1981
L-81-230

Office of Nuclear Reactor Regulation
Attention: Mr. Darrell G. Eisenhut, Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Eisenhut:

Re: Turkey Point Units 3 & 4 and St. Lucie Unit 1
Docket No. 50-250, 50-251, and 50-335
Environmental Qualification of Electrical Equipment

We have received the preliminary evaluation of our response to I&E Bulletin 79-01B for Turkey Point Units 3 & 4 and St. Lucie Unit 1. Florida Power & Light Company, together with our architect engineers, have spent considerable time, effort, and money researching and evaluating the enviornmental qualification information requested by I&E Bulletin 79-01, 79-01B and the supplements to 79-01B. We find the systematic rejection of that work for non-technical reasons disturbing.

We found the majority of the equipment evaluated against the D.O.R. guidelines to be acceptable by test, analysis or a combination of both. We committed to replace or upgrade the installation of the equipment that could not be demonstrated to fully meet the guidelines. These actions are scheduled to be completed by the Commission's Memorandum Order date of June 1982, unless qualified equipment for these applications are not available.

Despite our efforts, the preliminary evaluation by the NRC has noted many deficiencies or unanswered questions. It is obvious that considerable effort is still required by both our staffs to complete the NRC review of our response, and the review of backup documentation in our files. If after reviewing our supporting documentation and analysis additional equipment is identified as having to be replaced or further tested, this delay will most likely cause us to be unable to meet the June of 1982 deadline.

Many of the current manufacturers of safety related equipment are quoting delivery dates that already go beyond June of 1982. Recently, at a meeting with members of the NRC's I&E and the NRR's Equipment Qualification Branch, a representative of a major instrumentation supplier stated that their quoted delivery dates were a minimum of 14 months. At this time, and based upon an analysis of the industry's needs, he and his competitors would need three to four years to deliver the required instruments to the industry.

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In an effort to overcome this problem Florida Power & Light Company, together with many other utilities, are involved in programs to qualify electrical and electronic equipment, but these programs take considerable time. Testing facilities are backlogged and qualification programs are very complex. The excessive conservatism of the test requirements test equipment to the edge of available technology. Issues such as artificial aging are complex and time consuming. A qualification program can take a year or more, just to demonstrate five to ten years of qualified life. These rigorous, time consuming, expensive programs are not necessarily resulting in a safer plant. Equipment ends up being designed around the test conditions instead of service conditions. Sacrifices in accuracy, servicability and availability are made so that the equipment can pass a full test plan. This considerable effort is being undertaken despite our findings that the plant is safe to operate and the issue is one of backfitting new criteria.

We are also finding that manufacturers are having to be coaxed and cajoled to participate in these qualification programs. Many of the suppliers of quality equipment are leaving the nuclear business since it represents a small fraction of their business and the regulatory requirements make it unattractive to continue to deal in nuclear applications.

It is our position that more realistic guidelines need to be developed, and that the industry should be given sufficient time to meet the requirements.

In addition, the NRC position (Technical Specification 6.1.3.1) of all safety-related electrical equipment required by June 30, 1982 is unclear. We plan on implementing these requirements in the following manner:

(a) For new equipment subject to I&E Bulletin 79-01B, whether for replacement of existing equipment or new application, we will apply the guidelines of NUREG 0588 category I, unless there are sound reasons to the contrary. These reasons could be incompatibility or unavailability of equipment.

(b) Installed equipment we have evaluated against the "DOR Guidelines for Operating Plants" and found to be acceptable, will be maintained, including replacing parts as required, in accordance with the manufacturers instructions to maintain the qualification of this equipment.

(c) For safety related equipment, not subject to a harsh environment, we are requiring testing and certification to our seismic requirements and are awaiting further industry guidance with respect to environmental qualification.

It is our opinion that these guidelines, along with our procedures for controlling design and maintenance, provide a high level of confidence that the electrical equipment utilized in the plant meet the required environmental qualifications.

Yours very truly,

Robert E. Uhrig
Vice President
Advanced Systems and Technology

REU/JEM/ras

cc: Mr. James P. O'Reilly, Region II
Harold F. Reis, Esquire