

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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| In the Matter of |) | |
| |) | |
| PACIFIC GAS AND ELECTRIC COMPANY |) | Docket No. 50-275 |
| |) | Docket No. 50-323 |
| Diablo Canyon Nuclear Power Plant |) | |
| Units No. 1 and 2 |) | (Full Power Proceeding) |
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AFFIDAVIT OF GARY H. MOORE
CONCERNING ISSUES RELATED TO
ENVIRONMENTAL QUALIFICATION OF SAFETY-RELATED ELECTRICAL EQUIPMENT

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| STATE OF CALIFORNIA |) | |
| |) | SS |
| CITY AND COUNTY OF SAN FRANCISCO |) | |

GARY H. MOORE being first duly sworn deposes and says:

1. In response to NUREG-0588 and NRC Memorandum and Order CLI-80-21, PGandE submitted an Environmental Qualification Report, Revision 1 (the Report) on September 2, 1981. The Report documented PGandE's environmental qualification (EQ) program of safety-related electrical (Class IE) equipment. The NRC Staff has evaluated and accepted PGandE's EQ program, and has documented this evaluation in SER Supplement 15. In addition, the Staff has performed audits, including a complete, 100% review of PGandE's EQ program and documentation. The SER Supplement 15 states the following conclusion regarding EQ of Class IE equipment at Diablo Canyon:

"Based on these considerations, the staff concludes that conformance with the above requirements and satisfactory completion of the corrective actions by June, 30, 1982 will ensure compliance with the Commission Memorandum and Order [CLI-80-21] of May 23, 1980. The staff further concludes that there is reasonable assurance of safe operation of this facility pending completion of these corrective actions. This conclusion is based on the following:

- (1) There are no outstanding items which would require immediate corrective action to assure safety of plant operation.
- (2) Some of the items found deficient have been or are being replaced or relocated, thus improving the facility's capability to function following a LOCA or HELB.
- (3) The harsh environmental conditions for which this equipment must be qualified result from low-probability events; events which might reasonably be anticipated during this very limited period would lead to less demanding service conditions for this equipment.
- (4) The applicant has provided justification for operation with unqualified components or documentation-deficient components."

2. The Class IE equipment identified in the Report constitutes that equipment that has been considered by PGandE for environmental qualification in accordance with the requirements stated by the NRC in NUREG-0588 and Commission Memorandum and Order CLI-80-21. The qualification information documented in the Report represents the status, as of September 2, 1981, of qualification for each type of equipment identified.

3. For certain Class IE equipment for which full qualification has not been demonstrated, completion of qualification of such equipment or replacement with qualified devices has been scheduled. The schedule for completion of qualification or replacement is consistent with the requirements of NUREG-0588.

4. PGandE is conducting aging studies to establish the qualified service life of Class IE equipment. These studies will be completed and documented by June 30, 1982, as required by Commission Memorandum and Order CLI-80-21.
5. PGandE has committed to meet Reg Guide 1.97, Revision 2 by June, 1983, the required compliance date. PGandE has established a proposal for meeting the requirements of the revised Reg Guide.
6. The human factors effects of multiple failures of non-qualified equipment is not within the scope of environmental qualification review of safety-related electrical equipment. The EQ review ensures that adequate safety-related indication exists to allow the operators to perform the required safety functions.

Gary H. Moore
GARY H. MOORE

Subscribed and sworn to before me
this 9th day of November, 1981

Theodora Cooke
Theodora Cooke, Notary Public in
and for the City and County of
San Francisco, State of California

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My Commission expires January 28, 1985