

SNUPPS

Standardized Nuclear Unit
Power Plant System

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July 16, 1984

Nicholas A. Petrick
Executive Director

SLNRC
SUBJ:

84-0102 FILE: 0278
Justifications for Interim
Operation - Seismic Qualification

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Docket Nos.: STN 50-482 and STN 50-483

Reference: SLNRC 84-0101, dated June 29, 1984: Equipment Qualification
Justifications for Interim Operation (JIO)

Dear Mr. Denton:

Enclosed are responses to NRC staff questions regarding the subject
Justifications for Interim Operation submitted by the reference letter.

The JIO documents in the reference letter have been reviewed by the
SNUPPS Staff and Utilities and provide the basis for seismic qualifi-
cation of the effected equipment for SNUPPS applications. These docu-
ments will be maintained as the basis for qualification until the review
of qualification documentation is completed by the Westinghouse User's
Group for Equipment Qualification.

The enclosure contains information proprietary to Westinghouse Electric
Corporation. The basis for the proprietary nature of this information
is that it has been extracted from ongoing equipment qualification
testing performed under the Westinghouse generic qualification program
described in WCAP-8687 (Westinghouse Proprietary Class 2). The Westing-
house generic qualification program is under review by the NRC's Equip-
ment Qualification Branch, and the proprietary nature of WCAP-8687 data
has been previously recognized by the NRC staff. The enclosed propri-
etary information has been provided on an expedited basis to support the
NRC staff review. Accordingly, it is respectfully requested that the
information which is proprietary to Westinghouse be withheld from public
disclosure in accordance with 10CFR Section 2.790 of the Commission's
regulations.

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Very truly yours,


Nicholas A. Petrick

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Enclosure
cc: See Page 2.

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| | |
|----------------------|------------|
| cc: G. L. Koester | KGE |
| D. T. McPhee | KCPL |
| D. F. Schnell | UE |
| J. Neisler/B. Little | USNRC/CAL |
| H. Bundy | USNRC/WC |
| B. L. Forney | USNRC/RIII |
| E. H. Johnson | USNRC/RIV |

Enclosure

Responses to NRC Questions on
Justifications for Interim Operation (JIO)

JIO ESE-13

1. Provide a commitment date for completion of qualification.

Response: The qualification program for all Westinghouse-supplied equipment, such as ESE-13, is not considered complete until the Westinghouse User's Group for Equipment Qualification has finished its review of the documentation. This review procedure has been described in the SNUPPS NUREG-0588 Submittal which has been provided to the NRC. The User's Group review of ESE-13 which considers both environmental and seismic qualification, is scheduled for completion in December, 1984. However, the ESE-13 JIO for SNUPPS relates only to seismic qualification because ESE-13 equipment is located in mild environment areas of the SNUPPS plants. The JIO consists of information extracted from the ongoing qualification program which has been provided to the NRC on an expedited basis. As stated in the JIO, the ESE-13 "performance has been demonstrated to be acceptable for SNUPPS by seismic testing. However, the JIO will remain in effect until the final Westinghouse evaluation of anomalies is completed".

Based on the above, the qualification program completion date is 12/84. However, this date is not applicable to the seismic qualification of ESE-13 equipment which has been adequately documented by the JIO.

2. Provide a commitment date for completion of evaluation of anomalies.

Response: Westinghouse has scheduled the completion of anomaly evaluation for ESE-13 equipment for August, 1984.

3. Provide a commitment to supply the results of the anomaly evaluation to the NRC.

Response: A summary of the evaluation results will be provided to the NRC in the ESE-13 qualification reports. In the event that any results of the evaluation are determined to be reportable, reporting will be accomplished in accordance with regulatory requirements.

JIO ESE-47

1. Provide a commitment date for completion of qualification.

Response: The Westinghouse User's Group review of the ESE-47 qualification program is scheduled for completion in March, 1985. However, based on the information provided in the JIO, "seismic qualification of the ESE-47 equipment has been demonstrated for SNUPPS applications and this JIO is terminated".

JIO ESE-56A

1. Provide a commitment date for completion of Westinghouse Field Change Notice (FCN) SCPM-10622.

Response: FCN SCPM-10622 will be completed prior to Callaway Plant exceeding 5% of rated full power. The corresponding FCN for Wolf Creek Generating Station, FCN-SAPM-10627, will be completed prior to Wolf Creek exceeding 5% of rated full power.

2. Will the oxidation inhibitor discussed in the JIO be installed in the SNUPPS plants?

Response: Westinghouse has completed an evaluation of the need for an oxidation inhibitor and recommends that the inhibitor not be used. This conclusion will be documented in the qualification reports for the ESE-56A equipment.

3. Provide a commitment date for completion of qualification.

Response: The Westinghouse User's Group review of the ESE-56A qualification program is scheduled for completion in November, 1984. However, the JIO documents acceptable seismic qualification of the equipment, and the JIO has been terminated.

4. Provide additional justification that the equipment need only function before and after, but not during, a seismic event.

Response: The equipment acceptably met the Westinghouse acceptance criteria for the seismic test which did not require demonstration of operation during the seismic event. This criterion is based on the design and qualification criteria for Category I instruments required by Regulatory Guide 1.97, Revision 2 which state that "Instrumentation should continue to read within the required accuracy following, but not necessarily during, a safe shutdown earthquake".

JIO ESE-12A

1. Provide a commitment date for completion of qualification.

Response: The Westinghouse User's Group review of the ESE-12A qualification program is scheduled for completion in November, 1984. However, as stated in the JIO, "seismic qualification of the ESE-12A equipment for SNUPPS applications has been demonstrated; and this JIO is terminated".

JIO ESE-40

1. In light of the significant difference in weight between models, provide additional bases for the statement that the similarity for Models 581A and 288A of design details affecting seismic performance allows conclusions about the Model 288A to be drawn from tests of the Model 581A.

Response: Based on the seismic testing that was performed, the Model 581A is dynamically rigid. Because the 288A is much less massive than the Model 581A, yet is similar in design, the Model 288A can also be considered dynamically rigid. Therefore, the difference in weight does not invalidate the qualification of Model 288A by similarity to the Model 581A.

2. When will revised setpoints, required for qualification, be implemented at the SNUPPS plants?

Response: ESE-40 flow switch setpoints will be revised at both Callaway Plant and Wolf Creek Generating Station prior to exceeding 5% of rated full power.

3. Provide a commitment date for completion of qualification.

Response: The Westinghouse User's Group review of the ESE-40 qualification program is scheduled for completion in December, 1984. However, as noted in the JIO, seismic qualification is acceptable when the setpoints have been revised. However, the JIO will remain in effect until the SNUPPS documentation review is completed. The JIO will remain in effect not because of seismic concerns but because this JIO relates to the SNUPPS NUREG-0588 environmental qualification review program.

4. Table 1 from the JIO is missing.

Response: Table 1 to the JIO is attached and should be inserted into the JIO as page 5a.

JIO Cutler Hammer Series E-30 Pushbutton Assemblies

1. Provide a commitment date for completion of qualification.

Response: The qualification has been completed; and, accordingly, this JIO has been terminated. Refer to the attached document.

2. The test description indicates that only one biaxial SSE test was run. This does not demonstrate qualification for all possible orientations of the equipment.

Response: This question arose because the JIO test description inadequately described the testing which was done. During actual testing, the equipment was rotated for each seismic test run. The SSE testing actually consisted of 4 different SSE runs, and the equipment was rotated prior to each run.