

ATTACHMENT 2 TO JPN-85-55

Engineering Design Procedure 12

Procedure for Establishing
Quality Assurance Category Classification

New York Power Authority
James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333

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P PDR

NEW YORK POWER AUTHORITY
JAMES A. FITZPATRICK NUCLEAR POWER PLANT
ENGINEERING AND DESIGN PORCEDURES

TITLE: PROCEDURE FOR ESTABLISHING QUALITY ASSURANCE CATEGORY CLASSIFICATIONS PROC. NO.: EDP-12

APPROVED BY: Victor M. Waly by direction
TECHNICAL SERVICES SUPT.

DATE: 8/23/84

CONCURRED BY: Richard L. Patch
QUALITY ASSURANCE SUPT.

DATE: 8/23/84

APPROVED BY: by dir. R. Cannon
RESIDENT MANAGER

DATE: 8/23/84

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1.0 PURPOSE

- 1.1 The purpose of this engineering and design procedure is to provide instructions and guidance for establishing the quality assurance category classification of plant structures, systems and equipment.
- 1.2 This procedure shall be used for establishing the quality assurance category classifications for new structures, systems and equipment added by plant modifications, if the classification was not clearly established by the modification process.
- 1.3 This procedure shall be used for re-establishing the quality assurance classification for existing structures, systems and equipment when it is determined that there is a need to do so or if the quality assurance classification was not previously established.
- 1.4 This procedure provides instructions and guidance for establishing the environmental sub-category (harsh or mild environment) for safety-related electrical equipment for the purpose of establishing electric equipment qualification requirements.

2.0 REFERENCES

- 2.1 ANSI N45.2-1974, Quality Assurance Requirements for the Design of Nuclear Plants
- 2.2 WACP 10.1.6, Control of Modifications, Component Changes, and Safety and Environmental Impact Evaluation Reports
- 2.3 JAFNPP Final Safety Analysis Report, Section 12.2 -Classification of Structures and Equipment
- 2.4 Code of Federal Regulations, 10CFR50, Appendix A
- 2.5 JAF Engineering and Design Procedure EDP-3 - Design Verification Procedure
- 2.6 Authority Quality Assurance Procedure QAP 2.1 -Quality Assurance Program Scope
- 2.7 JAF Plant Standing Order (PSO) No. 32 - Component Quality Assurance Category Requests

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- 2.8 10CFR50.49 - Environmental Qualification of Electric Equipment Important to Safety for Nuclear Power Plants
- 2.9 10CFR50, Appendix A - General Design Criteria for Nuclear Power Plants.
- 2.10 10CFR50, Appendix B - Quality Assurance Criteria for Nuclear Power Plants and Fuel Processing Plants.

3.0 DEFINITIONS

- 3.1 Quality Assurance Classification - A classification level assigned for quality assurance purposes to plant structures, systems, and equipment. The assigned level is commensurate with the importance of the structure, system, or component in performing its specific design function as it relates to plant operations.
- 3.2 Quality Assurance Category I - The quality assurance classification for plant systems, or portions of systems, structures, and equipment whose failure or malfunction could cause a release of radioactivity that would endanger public safety. This category also includes equipment which is vital to a safe shutdown of the plant and the removal of decay and sensible heat, or equipment which is necessary to mitigate consequences to the public of a postulated accident.

The above definition should be interpreted to mean those structures, systems, and equipment that:

- 1. Are necessary to assure the integrity of the reactor coolant pressure boundary.
- 2. Are necessary to assure the capability to shutdown the reactor and maintain it in a safe shutdown condition.
- 3. Are necessary to assure the capability to prevent or mitigate the consequences of accidents which could result in potential off-site exposures comparable to the guidelines exposures of 10CFR100.

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4. Contain or may contain radioactive material and whose failure would result in conservatively calculated potential off-site doses which are more than 0.5 rem to the whole body or its equivalent to any part of the body.

For this classification the applicable criteria of 10CFR50, Appendix B should be applied.

- 3.3 Quality Assurance Category M - The quality assurance classification for plant systems, or portions of systems, structures, and equipment which do not fall within the definition of QA Category I but do perform a function which may have some importance to safety with respect to any design criteria.

For this classification selected criteria of 10CFR50, Appendix B shall be applied.

- 3.4 Quality Assurance Category II - The quality assurance classification for plant systems or portions of systems, structures, and equipment which are essential for the reliable generation of electric power (failures would result in the loss of electrical power generation in 8 hours or less) but which are not essential for a safe shutdown. Failure of this equipment could result in loss of power generation but would not endanger public safety. Equipment and systems which contain radioactive materials but whose failure could not release quantities sufficient to prejudice public safety are included in this category.

- 3.5 Quality Assurance Category III - The quality assurance classification for plant systems, or portions of systems, structures, and equipment which are not essential for the reliable generation of electrical power and which do not contain radioactive material or whose failure could not result in the release of radioactive material.

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3.6 Quality Assurance Sub-Category I (EH) - This sub-category of Q.A. Category I contains safety-related and post-accident monitoring electrical equipment required to remain functional during and following design basis events and which could directly experience harsh environmental conditions postulated to be caused by these events. These environmental conditions could include temperature, pressure, humidity, radiation, synergisms submergence, spray impingement, and aging affects. Environmental qualification per 10CFR50.49 (ref. 2.8) applies to this equipment.

3.7 Quality Assurance Sub-Category I (EM) - This sub-category of Q.A. Category I contains safety-related and post-accident monitoring electrical equipment required to remain functional during and following design basis events and are located in mild environment locations. A mild environment is an environment that would at no time be significantly more severe than the environment that would occur during normal plant operation, including anticipated operational occurrences.

4.0 RESPONSIBILITIES

4.1 Technical Services Department - Plant engineers and supervisor engineers in this department are responsible for performing classifications or re-classifications of quality assurance categories in accordance with this procedure. Knowledgeable personnel in other departments may be called on to perform the classification or perform the verification aspect of this procedure.

4.2 Quality Assurance Department - This department reviews classification evaluations and provides concurrence by signing the "Request for Classification Form" (Enclosure 1).

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5.0 PROCEDURE

- 5.1 Perform the quality assurance classification evaluation using the Enclosure 2 form titled: "Quality Assurance Classification Evaluation".
- 5.2 In performing the evaluation, utilize the following design inputs as applicable.
 - 5.2.1 James A. FitzPatrick Nuclear Power Plant Final Safety Analysis Report
 - 5.2.2 Code of Federal Regulations, 10CFR50
 - 5.2.3 JAFNPP Controlled Plant Drawings
 - 5.2.4 JAFNPP Operating Procedures and Emergency Operating Procedures
 - 5.2.5 Plant and System Design Bases and Analyses available from the Architect-Engineer and NSSS Vendor
 - 5.2.6 Applicable Regulatory Guide to which the Authority is committed
 - 5.2.7 NUREG-0800 - Standard Review Plan Sections 17.1 and 17.2
 - 5.2.8 JAFNPP System Descriptions
 - 5.2.9 Regulatory Guide 1.97, Rev. 2 -Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant and Environmental Conditions During and Following an Accident.
- 5.3 Establish the design function of the item being evaluated, and evaluate the performance of this function as it relates to the safety-related functions stated on the Enclosure 2 form.

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- 5.4 Perform an in-depth review of the equipment function to establish quality assurance classification. When performing this classification, it must be realized that the original plant design classified entire systems with minimal evaluation of the actual function performed by individual components. This approach is substantiated by the overall system classifications contained in the JAFNPP FSAR, Section 12.2.
- 5.5 Perform an evaluation to establish the quality assurance environmental sub-category for Q.A. Category I safety-related and post-accident monitoring electrical equipment. For harsh environment electrical equipment, establish the particular postulated design basis events for which the equipment must remain operational. Establish the environment sub-category as I (EH) or I (EM).
- 5.6 Following completion of the Enclosure 2 evaluation form, sign the form including name, title and date.
- 5.7 Obtain a design verification of the evaluation in accordance with the requirements of reference 2.5 with the following exceptions:
- 5.7.1 The method of verification in all cases is the "Design Review" method.
- 5.7.2 A satisfactory design verification shall be documented by signing in the space provided on the Enclosure 2 form. No other forms or signatures are necessary.
- 5.8 Following completion of the verification, obtain the approval of the Technical Services Superintendent or his designee. This approval is indicated by signing in the space provided on the Enclosure 2 form.
- 5.9 The evaluator and the Technical Services Superintendent (or designee) shall state the established category on the Enclosure 1 form and provide the required signatures.
- 5.10 Complete the Enclosure 3 memorandum to the Quality Assurance Superintendent. Attach a copy of the completed Enclosure 1 and 2 forms and forward to the addressee and indicated distribution.

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6.0 ENCLOSURES

- 6.1 Enclosure 1 - Request for Component Quality Assurance
 Category Classification
- 6.2 Enclosure 2 - Quality Assurance Classification Evalua-
 tion
- 6.3 Enclosure 3 - Forwarding Memorandum

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ENCLOSURE 1

NEW YORK POWER AUTHORITY
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REQUEST FOR COMPONENT QUALITY ASSURANCE CATEGORY CLASSIFICATION

SYSTEM _____
COMPONENT NO: _____
DESCRIPTION: _____
PRESENT QA CATEGORY: _____
REASON FOR REQUEST: _____

REQUESTED BY: _____
Signature _____ Date _____

FOR TECHNICAL SERVICES DEPARTMENT USE

The above request has been reviewed and the Quality Assurance Category determined to be Category _____.

EVALUATED BY: _____
Signature _____ Date _____

APPROVED BY: _____
Signature _____ Date _____

CONCURRENCE: _____
QA Superintendent _____ Date _____

PORC REVIEW: _____
Resident Manager _____
Meeting Number _____ Date _____

Copy sent to Requestor: _____
Date _____

Revised List Issued: _____
Date _____

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ENCLOSURE 2

QUALITY ASSURANCE CLASSIFICATION EVALUATION

I. ITEM DESCRIPTION (as applicable)

I.1 Structure Name: _____
I.2 System Number: _____
I.3 System Name: _____
I.4 Component I.D. No: _____
I.5 Component Name: _____
I.6 Reference Dwg. No: _____

II. ITEM FUNCTION (describe in detail the design function of the item)

III. SAFETY-RELATED FUNCTION EVALUATION (Check the correct response or indicate Not Applicable - NA)

If an item meets one or more criteria contained in this section it should be classified as QA Category I unless sound reasons to the contrary are stated in Step III.30.

	<u>YES</u>	<u>NO</u>	<u>NA</u>
III.1 Does the item function to assure the integrity of the reactor coolant pressure boundary?	___	___	___
III.2 Does this item function to assure the capability to shutdown the reactor and maintain it in a safe shutdown condition?	___	___	___

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ENCLOSURE 2
(Continued)

		<u>YES</u>	<u>NO</u>	<u>NA</u>
III.3	Does this item function to assure the capability to prevent or mitigate the consequences of accidents which could result in potential off-site radiation exposures comparable to the guideline exposures of 10CFR100?	—	—	—
III.4	Does this item contain or may contain radioactive material whose failure would result in conservatively calculated potential off-site doses which are more than 0.5 rem to the whole body or its equivalent to any part of the body?	—	—	—
III.5	Does this item function to <u>prevent</u> the consequences of accidents postulated in the JAFNPP FSAR?	—	—	—
III.6	Does this item function to <u>mitigate</u> the consequences of accidents postulated in the JAFNPP FSAR?	—	—	—
III.7	Does this item perform the function of missile, pipe whip, or flood protection for safety-related equipment (GDC 4)?	—	—	—
III.8	Does this item function to assure that specified acceptable fuel design limits are not exceeded for analyzed normal and abnormal operating conditions (GDC 12)?	—	—	—
III.9	Does this item function to control reactor operating parameters (GDC 12)?	—	—	—
III.10	Does this item function to provide instrumentation of a monitored variable for control or indication for those variables and systems that affect the following (GDC 13):			
	1. Fission Process?	—	—	—
	2. Reactor Core Integrity?	—	—	—

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ENCLOSURE 2
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		YES	NO	NA
	3. Reactor Coolant Boundary?	___	___	___
	4. Containment Integrity?	___	___	___
	5. Core Cooling?	___	___	___
III.11	Does this item function as a pressure boundary in any of the following applications:			
	1. Reactor Coolant Pressure Boundary?	___	___	___
	2. ECCS System Pressure Boundary?	___	___	___
	3. Primary Containment Pressure Boundary? (GDC 14, 30, 31)	___	___	___
III.12	Does this item function as part of the primary containment (GDC 16)?	___	___	___
III.13	Does this item function as part of the plant's emergency electric power system (GDC 17)?	___	___	___
III.14	Does this item function as part of the Control Room boundary (GDC 19)?	___	___	___
III.15	Does this item function as part of the protection system designed to initiate automatic shutdown of the reactor (GDC 20)?	___	___	___
III.16	Does this item function as part of a reactivity control system (GDC 26, 27)?	___	___	___
III.17	Does this item function as or a part of a residual decay heat removal system designed to remove heat from the reactor core such that fuel design limits or pressure boundary design conditions are not exceeded (GDC 34)?	___	___	___
III.18	Does this item function as part of an emergency core cooling system (GDC 35)?	___	___	___
III.19	Does this item function to provide containment heat removal (GDC 38)?	___	___	___

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		<u>YES</u>	<u>NO</u>	<u>NA</u>
III.20	Does this item function to provide containment atmosphere cleanup (GDC 41)?	—	—	—
III.21	Does this item function to provide cooling water to transfer heat from safety-related structures, systems, and components under normal and accident conditions (GDC 44)?	—	—	—
III.22	Does this item function to provide reactor boundary isolation (GDC 55)?	—	—	—
III.23	Does this item function to provide primary containment isolation (GDC 55, 56, 57)?	—	—	—
III.24	Does this item function to provide for the control of releases of radioactive materials to the environment (GDC 60)?	—	—	—
III.25	Does this item function to provide storage and the prevention of criticality of fuel storage and handling systems (GDC 61, 62)?	—	—	—
III.26	Does this item function to provide monitoring of fuel and waste storage systems to detect conditions that may result in loss of residual heat removal capability or excessive radiation levels (GDC 63)?	—	—	—
III.27	Does this item function to monitor the reactor containment atmosphere, spaces containing components for recirculation of LOCA fluids, effluent discharge paths, and the plant environs for radioactivity from normal operations, anticipated operational occurrences, and postulated accidents (GDC 64)?	—	—	—
III.28	Could the failure of this item in any way degrade the performance of any other safety system?	—	—	—

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If yes, provide explanation:

YES NO NA

III.29 Is this item a part of an instrumentation system used by the Control Room operator to assess plant and environs conditions during and following postulated design basis events?

— — —

Use Regulatory Guide 1.97, Rev. 2 for guidance for establishing the appropriate quality assurance classification. For items not included in Reg. Guide 1.97, review the instruments design and safety basis as defined in the FSAR. Provide justification in III.30 if not classifying as QA Category I.

III.30 If the item under evaluation meets any criteria in this section, it should normally be classified as QA Category I. If there are sound reasons to the contrary (i.e., approved licensing bases, approved plant design criteria, or NRC approval) provide the justification in the space below along with the recommended alternate QA Category recommendation.

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YES NO NA

IV. IMPORTANT TO SAFETY FUNCTION EVALUATION (CAT. M)

- IV.1 Does this item function to provide fire protection, which minimizes consistent with other safety requirements, the probability and effects of fires and explosions (GDC 3)?

NOTE: The diesel and electric fire pumps are Q.A. Category I and are not to be classified under this criteria.

- IV.2 Does the item provide some function of possible importance to safety but does not directly meet the safety-related criteria defined in Section III above?

Provide explanation:

* If the item under evaluation meets the above criteria, it should be classified as QA Category M.

V. NON-SAFETY FUNCTION EVALUATION (QA CAT. II OR III)

- V.1 If the item does not meet QA Category I or M criteria and considering the definitions of QA Category II and III, state the correct classification for the item under consideration and a justification.

QA Category II/III (Circle One)

- V.2 Justification:

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VI. EVALUATION OF THE GENERIC APPLICABILITY OF THE CLASSIFICATION REQUEST

Review the generic applicability of the subject classifications request per the following:

- | | <u>YES</u> | <u>NO</u> | <u>NA</u> |
|--|------------|-----------|-----------|
| VI.1 Are there similar or associated components which have been identified during this evaluation which are presently not classified in the QA Category List? | _____ | _____ | _____ |
| VI.2 Does the subject evaluation and established quality assurance category indicate a need to review existing QA Category classifications for similar plant components for the purpose of reclassification? | _____ | _____ | _____ |
| VI.3 If the response is YES to either VI.1 or VI.2, include these other components which have been identified in this evaluation or prepare an additional classification request. | | | |

List the additional components identified by this review which require classification or re-classification:

Indicate whether these components are included in this evaluation or if an additional classification request has been prepared:

(Check One) _____ This evaluation
 _____ New classification request

VII. Q.A. CATEGORY I - ENVIRONMENTAL SUB-CATEGORIZATION

VII.1 Complete the following for the equipment and components under evaluation:

a. Evaluated QA Category

(Circle One) I II III M

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- b. Is the equipment or components under evaluation electrical in nature or include electrical components (i.e. electro-mechanical, electro-pneumatic).

(Circle One) YES/NO

If the Q.A. Category is I and the answer to VII.1.b is YES, proceed to VII.2. If NO, proceed to Section VIII.

- VII.2 State location of equipment or components, including building and elevation.

Building _____ Elevation _____

- VII.3 Determine which of the following design basis events for which the subject safety-related equipment items must remain functional in order to perform its intended safety function and safety design basis:

	AREAS AFFECTED	YES	NO
1.	Primary Containment (PC) and RB LOCA (Small or Large)	___	___
2.	Primary Containment MSLB PC and RB	___	___
3.	RCIC Steam Line Break (HELB) RB	___	___
4.	HPCI Steam Line Break (HELB) RB	___	___
5.	RWCU System Line Break (HELB) RB	___	___
6.	Main Steam Line Break TB Steam Tunnel	___	___

- VII.4 If the subject Q.A. Category I electrical equipment must perform its intended safety function in a postulated harsh accident environment, establish its environmental sub-category as I (EH).

If the subject Q.A. Category I electrical equipment performs its intended safety function in a mild environment, establish its environmental sub-category as I (EM).

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Circle the evaluated environmental sub-category:

I (EH) I (EM)

Discussion: _____

VIII. EVALUATION/SUMMARY

VIII.1 EVALUATED QA CATEGORY

(Circle One) I II III M

VIII.2 QA CAT. I ENV. SUB-CATEGORY

(Circle One) I (EH) I (EM) N/A

VIII.3 SUMMARY OF EVALUATION (state briefly the significant evaluation criteria which establishes category)

IX. DESIGN INPUTS UTILIZED

1. _____
2. _____
3. _____
4. _____
5. _____

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X. EVALUATION VERIFICATION AND APPROVAL

1. Evaluated by: _____
Title: _____
Date: _____
2. Verified by: _____
(Design Review)
Title: _____
Date: _____
3. Approved by: _____
Technical Services Supt. (or designee)
Date: _____

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ENCLOSURE 3

MEMORANDUM TO: QUALITY ASSURANCE SUPERINTENDENT
FROM: TECHNICAL SERVICES SUPERINTENDENT
VIA: SUPERINTENDENT OF POWER
SUBJECT: QUALITY ASSURANCE CATEGORY REQUESTS; COMPLETED
EVALUATIONS FOR CONCURRENCE
Reference: (a) JAF Plant Standing Order PSO No. 32 -
Component Quality Assurance Requests

1. The completed quality assurance category evaluations for the following listed items have been completed in accordance with reference (a) and are forwarded for your concurrence:

a. _____
b. _____
c. _____
d. _____
e. _____
f. _____
g. _____
h. _____

2. Questions relating to these evaluations shall be addressed to the engineer who prepared the individual evaluations.

TECHNICAL SERVICES SUPERINTENDENT

CC: Responsible Engineer
QC Supervisor
Document Control Center