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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

October 3, 1996

Kris L. Christine and
Peter C. Christine
P.O. Box 12
Alna, Maine 04535

Dear Ms. & Mr. Christine:

I am responding to your letter dated August 3, 1996, in which you asked whether Maine Yankee would file a written justification for continued operation (JCO) and an engineering analysis for equipment that did not meet the environmental qualification (EQ) requirements, in accordance with Generic Letter (GL) 91-18, "Information to Licensees Regarding The NRC Inspection Manual Sections on Resolution of Degraded and Nonconforming Conditions and on Operability," before receiving NRC's approval for restart. In fact, Maine Yankee did prepare a JCO for those items which could not be relocated to avoid submersion after a loss of coolant accident (LOCA). The JCO included, referenced, and/or referred to engineering analyses, which, like the JCO, are retained at the plant. Formal NRC approval was not required for Maine Yankee to restart the plant; however, NRC understood that the utility would not proceed to restart until both Maine Yankee and the NRC were satisfied that the plant was ready to resume operation. The NRC reviewed Maine Yankee's actions prior to restart and concluded that they were appropriate and are consistent with NRC guidance in GL 91-18 and GL 88-07, "Modified Enforcement Policy Relating to 10 CFR 50.49, 'Environmental Qualification of Electrical Equipment Important to Safety for Nuclear Power Plants.'"

Generic Letter 91-18 indicates that environmental qualification issues are addressed using GL 88-07, dated April 7, 1988. Generic Letter 88-07 does not require the licensee to file a JCO with the NRC when unqualified equipment is identified; however, it notes that written justification for continued operation is to be available for NRC review.

Maine Yankee and the NRC staff conducted independent reviews of the recently identified problem prior to restart. As a result of the Independent Safety Assessment Team's questions pertaining to electric components important to safety that could become submerged following a postulated LOCA, Maine Yankee in July 1996 performed a walkdown of electric equipment requiring EQ inside the reactor containment and identified 30 items that could become fully or partially submerged post-LOCA. Most of the items, which included such equipment as Rosemount level transmitters and pigtails (cable), valve

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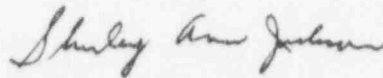
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position switches and pigtails, and Rockbestos cable, are for post-accident monitoring (Regulatory Guide 1.97, "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident," items). About one half of the 30 items are in the steam generator level indication instrument loops. The remaining items are used for valve position indication. As a result, Maine Yankee relocated some instruments and developed a JCO in accordance with GL 88-07 for the others.

An NRC inspection was conducted from August 6 to August 9, 1996, to review Maine Yankee's corrective actions in response to the electric equipment submergence issue and Maine Yankee's JCO for those items that would remain submerged after a LOCA for which EQ could not be established. The inspection concluded that Maine Yankee had properly provided a justification in Maine Yankee document DBS No. 96-044, "Design Basis Screen to Assess the Results of Submergence on EQ Components on the -2 ft. Elevation of the Reactor Containment and Review the Impact of their Submergence on Nuclear Safety," Revision 1, dated August 8, 1996. This justification was reviewed by the NRC during the inspection and was determined to be acceptable.

If you have any additional questions in this matter, please contact Mr. Richard J. Conte, Chief, Reactor Projects Branch No. 5 in our Region I office at (610) 337-5183.

Sincerely,

A handwritten signature in cursive script, reading "Shirley Ann Jackson".

Shirley Ann Jackson