

*Here is the second SQUG Newsletter of 2002. It's a quick update of ongoing SQUG activities and we hope it wets your whistle for the SQUG Winter meeting in Sanibel Island, FL on December 12 and 13.*

*As always, we encourage you to send in your comments and thoughts so that we can make the Newsletters as valuable as possible.*

**John Richards**  
**SQUG Chairman**

## **NARE and 50.59 Guidelines**

In the last Newsletter, we said we expected to issue the updated NARE Guideline and 50.59 Template this summer. Unfortunately, they were delayed from mid summer to November. As you may remember, the NERP team recommended revisions to the NARE Guideline as a result of their reviews of NARE examples. A few additional updates were included for consistency with the updated 50.59 Template and NARE Training.

The 50.59 Template is being updated to reflect the amendments to the rule (10 C.F.R. § 50.59) and the revised industry 50.59 implementing guidance, as well as consistency with the NARE Guideline and Training.

All of these updates will be completed before the upcoming NARE Training on November 12 & 13. They will also be posted on the SQUG web site (<http://squgweb.mpr.com/>).

## **NARE Training**

Speaking of the NARE Training, there wasn't enough demand for the summer course so it was postponed until November. You should have received an announcement or two concerning this change. The good news is that the postponement offered an opportunity to update the training materials. The changes included trimming down the lecture part to include more time for the examples,

swapping out some of the examples for more applicable cases, and minor adjustments for consistency with the revised NARE Guideline and 50.59 Template.

## **NERP Update**

The NARE Guideline update delay caused a delay for the NERP team. They needed the revised NARE forms before they could complete and publish their evaluations. Current plans are for the first set of examples to be completed and ready for posting on the SQUG web site by the December SQUG meeting.

They are still looking for more examples so please contact Don Moore ([dpmoore@southernco.com](mailto:dpmoore@southernco.com), 205-992-6672) if you have any to offer.

All of the NARE and NERP information will be discussed at the December SQUG meeting

## **eSQUG News**

The QA version of eSQUG, the web based SQUG electronic database, is in acceptance testing at EPRI. This release will also include new data from the Manzanillo Power Plant in Mexico (October 1995 Manzanillo Earthquake, Magnitude 7.9) as well as the Olive View Hospital and Cogeneration Facilities (January 1994 Northridge Earthquake, Magnitude 6.7).

## **Highlights**

NARE Guidelines.....	1
NARE Training .....	1
NERP Update.....	1
eSQUG News.....	1
SCE Training.....	1
HVAC Guideline .....	1
SQUG Web Site.....	2
ASME & IEEE Standards .....	2
SQUG Winter Meeting .....	2
Late Breaking News - SECY-02-0176 .....	3

Another release initially planned for this year is now planned for the first quarter of next year. That update will include data from the AES Placerita Cogeneration Facility (January 1994 Northridge Earthquake) and several sites from the September 1999 Chi Chi Taiwan Earthquake (Magnitude 7.6). This update will also incorporate the special damage evaluation reports (such as the Petalco Transformer evaluation) into the database.

## **SCE Training**

Earlier this year we looked into transferring the Walkdown Training video tapes to DVDs. Some of the tapes are getting old and the original master copies on are in a format (1" tapes created by ITC) that is quickly becoming obsolete. Fortunately, this was not too expensive and we are having it done as we speak. This will not change the course content, just the media. We should have a demo of the DVDs at the Winter meeting

## **HVAC Guideline**

We have been preparing an HVAC Evaluation Guideline this year. It provides members with an up to date summary of earthquake experience data for HVAC duct and an HVAC

walkdown screening procedure based on that data. The guidelines are similar to the cable tray guidelines but include additional criteria specific to ductwork. The information will be published as an EPRI report and will be available from EPRIWeb in the first quarter of 2003.

At this point, there are no plans to submit the report to the NRC for review or approval but it is still expected to be a valuable resource for members. Individual utilities may choose to submit the report for review in support of a plant-specific application. Our more recent experience seems to indicate that the NRC would be more willing to approve the approach on a case-by-case basis than on a generic basis.

## SQUG Web Site

The SQUG web site is scheduled for a face-lift! We are working on a plan to rearrange some of the information and provide more convenient links to find things. For example, we expect to have links such as:

- ◆ THE GIP
- ◆ MEETING MINUTES
- ◆ NEWSLETTERS
- ◆ NARE INFO
  - NARE GUIDELINES
  - 50.59 TEMPLATE
  - NERP EXAMPLES
  - TRAINING MATERIAL & REFERENCES
- ◆ SEQUAL INFO
- ◆ CALENDAR OF EVENTS
- ◆ MEMBER UTILITIES AND REPS
- ◆ FILE LIBRARIES

If you have any suggestions please pass them along to Dick Starck and John Richards. The SQUG Web Site is at <http://squgweb.mpr.com/>.

## ASME and IEEE Standards

We have been saying for YEARS that we're working with ASME and IEEE to include earthquake experience-based methods in their seismic qualification Standards. Well ... we think we're getting close ... no really.

The ASME QME Working Group finished a draft at the September meeting and we believe it will be sent out for ballot early next year. A LOT of work from utilities, consultants, and NRC went into this draft. Responses were prepared for over 200 comments and a number of difficult issues were resolved. We believe this draft has a pretty good chance of passing!

IEEE 344 had been moving slowly but that all changed over the summer. We are now meeting monthly through the end of the year to complete a draft for ballot. We are working hard to keep the general requirements in IEEE 344 consistent with those in ASME QME. Many of the same issues are being raised again in the IEEE 344 Working Group, however, we're still hopeful that we'll be successful. The charge to the Working Group is to have a draft ready for ballot early in 2003.

Neither Standard formally endorses the GIP. They offer a basic framework for an experience-based seismic qualification method within the Standards and are an important step towards more general application of the method.

Keep your fingers crossed!

## SQUG Winter Meeting

We hope you're planning on joining us for the SQUG Winter meeting at the Sundial Beach Resort on Sanibel Island, Florida on Thursday and

Friday, December 12 and 13, 2002 ([www.sundialresort.com](http://www.sundialresort.com)).

You should have received the meeting announcement with all of the directions, draft agenda, and pertinent info. We have a block of rooms under the EPRI/SQUG name with a \$125/night rate.

You can see that there is a lot going on and your input and participation is critical to the success of the organization.

We boiled most of the meeting business down to one day so that we could use the morning of the second day to focus on NARE issues. We'll discuss the changes to the NARE Guidelines and 50.59 Template, review the NERP Examples, and have a round table discussion of NARE issues.

## The End

We hope you find this Newsletter of value and that it helps to keep you up to date on our SQUG activities.

If you have any comments, thoughts, or contributions for the Newsletters, please let us know.

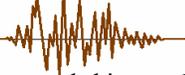


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## Late Breaking News SECY-02-0176



Just as I was about to send this out, I received a copy of SECY-02-0176, Proposed Rulemaking to add new Section 10 CFR 50.69, “Risk-Informed Categorization and Treatment of Structures, Systems, and Components” (WITS 199900061). It is a huge document (337 pages) and is available on the NRC’s web site ([www.nrc.gov](http://www.nrc.gov)) in pdf form.

It includes one part in particular that I believe is pretty disappointing to say the least. Stick with me through the background...

You may remember from last December’s SQUG meeting that a criterion is being developed to identify the safety significance of equipment with the hope that the maintenance and “special treatment” requirements for low safety significant equipment can be reduced. Seismic qualification is considered part of the special treatment requirements.

Most of the special treatment discussion has centered on RSIC-3 equipment; equipment that is safety related but low safety significant. On page 112, the SECY notes that RISC-3 equipment “would continue to be required to function under design basis seismic conditions, but would not be required to be qualified by testing or specific engineering methods in accordance with the requirements stated in 10 CFR Part 100, Appendix A.” You may recall that compliance with Appendix A of Part 100 is one of the critical boundaries the NRC used to draw the line between USI A-46 plants and non-A-46 plants. In general, A-46 plants are not committed to Appendix A and non-A-46 plants are committed to Appendix A.

The SECY paragraph goes on to say that “*The proposed rule would permit licensees to select a technically*

*defensible method to show that RISC-3 SSCs will remain functional when subject to design earthquake loads.”*

There is no agreed upon criteria for this but, there appears to be some opportunity to develop a reasonable approach.

The end of the paragraph finishes up with the following text...

*“The use of earthquake experience data has been mentioned as a potential method to demonstrate SSCs will remain functional during earthquakes. However, it would be difficult to rely on earthquake experience alone to demonstrate functionality of SSCs if the design basis includes multiple earthquake events or combinations of loadings unless these specific conditions were enveloped by the experience data. Additionally, if the SSC is required to function during or after the earthquake, the experience data would need to contain explicit information that the SSC actually functioned during or after the design basis earthquake events as required by the SSC design basis. The successful performance of an SSC after the earthquake event does not demonstrate it would have functioned during the event. Qualification testing of an SSC would be necessary if no suitable alternative method is available for showing that the SSC will perform its design basis function during an earthquake.”*

If I take the entire paragraph as a whole, it appears to say that even though RSIC-3 equipment isn’t required to meet Appendix A of Part 100, earthquake experience data still isn’t acceptable!

As I noted above, we have been working for YEARS with the NRC in the ASME and IEEE Standards committees to resolve questions like this but it appears that the NRC is going to stake out their position even before those Standards bodies publish

their criteria ... even for low risk significant equipment!

I urge you to submit your comments on this SECY to the NRC or to Adrian Heymer at NEI (202-739-8094, [aph@nei.org](mailto:aph@nei.org)). It was not necessary to make these statements in this document and is exasperating to those of us who have been making good faith efforts to work on these issues with the NRC.