



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

SAFETY EVALUATION REPORT  
SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 2&3  
DOCKET NOS. 50-361/362  
GENERIC LETTER 83-28, ITEM 2.2.1  
EQUIPMENT CLASSIFICATION  
PROGRAMS FOR ALL SAFETY-RELATED COMPONENTS

1.0 INTRODUCTION

Generic Letter 83-28 was issued by the NRC on July 8, 1983 to indicate actions to be taken by licensees and applicants based on the generic implications of the Salem ATWS events. Item 2.2.1 of that letter states that licensees and applicants shall describe in considerable detail their program for classifying all safety-related components other than RTS components as safety-related on plant documents and in information handling systems that are used to control plant activities that may affect these components. Specifically, the licensee/applicant's submittal was required to contain information describing (1) The criteria used to identify these components as safety-related; (2) the information handling system which identifies the components as safety-related; (3) the manner in which station personnel use this information handling system to control activities affecting these components; (4) management controls that are used to verify that the information handling system is prepared, maintained, validated, and used in accordance with approved procedures; and (5) design verification and qualification testing requirements that are part of the specifications for procurement of safety-related components.

The licensee for the San Onofre Nuclear Generating Station, Units 2&3 submitted responses to Generic Letter 83-28, Item 2.2.1 in submittals dated November 29, 1983 and June 18, 1987. We have evaluated these responses and find that they are acceptable.

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## 2.0 EVALUATION AND CONCLUSIONS

In these sections the licensee's responses to the program and each of five sub-items are individually evaluated against guidelines developed by the staff and conclusions are drawn regarding their individual and collective acceptability.

### 1. Identification Criteria

Guideline: The licensee's response should describe the criteria used to identify safety-related equipment and components. (Item 2.2.1.1)

Evaluation:

The licensee's response contains their criteria for identifying and classifying safety-related equipment and components which state that the safety classification of items is based on ANSI N18.2, 10CFR50 and Regulatory Guide 1.29. Also included is a description of how an activity is determined to be safety-related.

Conclusion:

We find the stated criteria meet the staff's requirements and are acceptable.

### 2. Information Handling System

Guideline: The licensee's response should confirm that the equipment classification program includes an information handling system that is used to identify safety-related equipment and components. Approved procedures which govern its development, maintenance, and validation should exist. (Item 2.2.1.2)

Evaluation:

The licensee's submittal identifies the Q-list as the primary information handling system that is used to identify safety-related structures, systems, components and parts. The description states that other items support the Q-list, including Table 3.2-1 of the FSAR, supplemental design drawings, the instrument index, the equipment index, the valve designation list, vendor drawings and the EQ Master List of Electrical Equipment. The licensee states that the quality assurance program requires adherence to procedures, document control, interdisciplinary reviews, surveillances and audits in the development of the Q-list. The station manager is stated to be responsible for maintaining the Q-list, while the Manager of Nuclear Engineering and Safety, the Project Manager, and the Technical Manager are responsible for changes in the Q-list. These lists have since been consolidated into the computerized San Onofre Maintenance Management System. This system includes the proper verification and documentation for its development.

Conclusion:

We conclude that this description of the licensee's information handling system satisfies the staff's concern and is acceptable.

3. Use of Information Handling System

Guideline: The licensee response should confirm that their equipment classification program includes criteria and procedures which govern the use of the information handling system to determine that an activity is safety-related and that safety-related procedures for maintenance, surveillance, parts replacement and other activities defined in the introduction to 10CFR50, Appendix B, are applied to safety related components. (Item 2.2.1.3)

Evaluation:

The licensee states that task specific procedures are written and approved for the above listed activities, and that the use of the current procedure is verified prior to use. The licensee also states that specific procedures and criteria govern the use of the information handling system to determine when an activity is safety-related. The procedures used for maintenance, testing, design changes, engineering support, setpoint changes or special tests or studies are identified programatically using the San Onofre Maintenance Management System.

Conclusion:

We conclude that the licensee's response describes a program that is acceptable.

4. Management Controls

Guideline: The licensee/applicant should confirm that management controls used to verify that the procedures for preparation, validation, and routine utilization of the information handling system have been and are being followed. (Item 2.2.1.4)

Evaluation:

The licensee states that the management controls are included in the Quality Assurance program. This program requires strict adherence to procedures, interdisciplinary reviews, document control and it identifies management responsibilities. The Quality Assurance Organization performs reviews, surveillances and audits to assure that the information handling system was prepared according to approved procedures, its contents have been validated, that it is being maintained current and that it is being used as intended.

Conclusion:

We conclude that this response addresses the staff's concern and is acceptable.

5. Design Verification and Procurement

Guideline: The licensee/applicant's response should document that past usage demonstrates that appropriate design verification and qualification testing is specified for the procurement of safety-related components and parts. The specifications should include qualification testing for expected safety service conditions and provide support for licensee's receipt of testing documentation which supports the limits of life recommended by the supplier. If such documentation is not available, confirmation that the present program meets these requirements should be provided. (Item 2.2.1.5)

Evaluation:

The licensee states that design verification and environmental qualification is specified in the procurement documents for all safety-related components. The Q-list is consulted in preparation of procurement documents. Source inspection and audits are said to ensure the appropriate design and manufacture. The environmental qualification document package must be completed, by remedial action if necessary, before an item is used in plant operation.

Conclusion:

We find the licensee's response meets the staff requirements for this item and are acceptable.

6. "Important To Safety" Components

Guideline: Generic Letter 83-28 states that licensee/applicant equipment classification programs should include (in addition to the safety-related components) a broader class of components designated as "Important to Safety." However, since the generic letter does not require licensee/applicant to furnish this information as part of their response, staff review of this sub-item will not be performed. (Item 2.2.1.6)

7. Program

Guideline: Licensees/applicants should confirm that an equipment classification program exists which provides assurance that all safety-related components are designated as safety-related on plant documents such as drawings, procedures, system descriptions, test and maintenance instructions, operating procedures, and information handling systems so that personnel who perform activities that affect such safety-related components are aware that they are working on safety-related components and are guided by safety-related procedures and constraints. (Item 2.2.1)

Evaluation:

The licensee's response to these requirements was contained in submittals dated November 29, 1983 and June 18, 1987. These submittals described the licensee's program for identifying and classifying safety-related equipment and components which meets the staff requirements as indicated in the preceding sub-item evaluations.

Conclusion:

We conclude that the licensee's program addresses the staff concerns regarding equipment and component classification and is acceptable.

3.0 REFERENCES

1. NRC Letter, D. G. Eisenhut to all Licensees of Operating Reactors, Applicants for Operating License, and Holders of Construction Permits, "Required Actions Based on Generic Implications of Salem ATWS Events (Generic Letter 83-28)," July 8, 1983.
2. Letter, Southern California Edison Company (F. R. Nandy) to NRC (G. W. Knighton), "Response to Generic Letter 83-28," November 29, 1983
3. Letter, Southern California Edison Company (M. O. Medford) to NRC, June 18, 1987