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## ***INFORMAL REPORT***

CONFORMANCE TO GENERIC LETTER 83-28, ITEM 2.2.1--  
EQUIPMENT CLASSIFICATION FOR ALL OTHER SAFETY-  
RELATED COMPONENTS: SAN ONOFRE-1

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Prepared for the  
**U.S. NUCLEAR REGULATORY COMMISSION**

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TECHNICAL EVALUATION REPORT

CONFORMANCE TO GENERIC LETTER 83-28, ITEM 2.2.1--  
EQUIPMENT CLASSIFICATION FOR ALL OTHER SAFETY-RELATED COMPONENTS:  
SAN ONOFRE-1

Docket No. 50-206

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## ABSTRACT

This EG&G Idaho, Inc., report provides a review of the submittal from Unit No. 1 of the San Onofre Nuclear Generating Station for conformance to Generic Letter 83-28, Item 2.2.1.

Docket No. 50-206

TAC No. 53713

## FOREWORD

This report is supplied as part of the program for evaluating licensee/applicant conformance to Generic Letter 83-28 "Required Actions Based on Generic Implications of Salem ATWS Events." This work is being conducted for the U.S. Nuclear Regulatory Commission, Office of Nuclear Reactor Regulation, Division of PWR Licensing-A, by EG&G Idaho, Inc., NRR and I&E Support Branch.

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Docket No. 50-206  
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CONFORMANCE TO GENERIC LETTER 83-28, ITEM 2.2.1--  
EQUIPMENT CLASSIFICATION FOR ALL OTHER SAFETY-RELATED COMPONENTS:  
SAN ONOFRE-1

1. INTRODUCTION

On February 25, 1983, both of the scram circuit breakers at Unit 1 of the Salem Nuclear Power Plant failed to open upon an automatic reactor trip signal from the reactor protection system. This incident was terminated manually by the operator about 30 seconds after the initiation of the automatic trip signal. The failure of the circuit breakers was determined to be related to the sticking of the undervoltage trip attachment. Prior to this incident, on February 22, 1983, at Unit 1 of the Salem Nuclear Power Plant, an automatic trip signal was generated based on steam generator low-low level during plant startup. In this case, the reactor was tripped manually by the operator almost coincidentally with the automatic trip.

Following these incidents, on February 28, 1983, the NRC Executive Director for Operations (EDO), directed the NRC staff to investigate and report on the generic implications of these occurrences at Unit 1 of the Salem Nuclear Power Plant. The results of the staff's inquiry into the generic implications of the Salem incidents are reported in NUREG-1000, "Generic Implications of the ATWS Events at the Salem Nuclear Power Plant." As a result of this investigation, the Commission (NRC) requested (by Generic Letter 83-28 dated July 8, 1983<sup>1</sup>) all licensees of operating reactors, applicants for an operating license, and holders of construction permits to respond to the generic issues raised by the analyses of these two ATWS events.

This report is an evaluation of the response submitted by the Southern California Edison Company, the licensee for the San Onofre Nuclear Generating Station, for Item 2.2.1 of Generic Letter 83-28. The document reviewed as a part of this evaluation is listed in the references at the end of this report.

## 2. REVIEW CONTENT AND FORMAT

Item 2.2.1 of Generic Letter 83-28 requests the licensee or applicant to submit, for the staff review, a description of their programs for safety-related equipment classification including supporting information, in considerable detail, as indicated in the guideline section for each sub-item within this report.

As previously indicated, each of the six sub-items of Item 2.2.1 is evaluated in a separate section in which the guideline is presented; an evaluation of the licensee's/applicant's response is made; and conclusions about the programs of the licensee or applicant for safety-related equipment classification are drawn.

### 3. Item 2.2.1 - PROGRAM

#### 3.1 Guideline

Licensees and applicants should confirm that an equipment classification program exists which provides assurance that all safety-related components are designated as safety-related on all plant documents, drawings and procedures and in the information handling system that is used in accomplishing safety-related activities, such as work orders for repair, maintenance and surveillance testing and orders for replacement parts. Licensee and applicant responses which address the features of this program are evaluated in the remainder of this report.

#### 3.2 Evaluation

The licensee for Unit No. 1 of the San Onofre Nuclear Generating Station responded to these requirements with a submittal dated November 28, 1983.<sup>2</sup> This submittal included information that describes their existing safety-related equipment classification program. In the review of the licensee's response to this item, it was assumed that the information and documentation supporting this program is available for audit upon request. The licensee states that the Q-list identifies safety-related components and is used to ensure that procedures governing safety-related activities are classified as safety-related and that these procedures have specific considerations for safety-related activities incorporated in them. Thus, safety-related activities are identified as such.

#### 3.3 Conclusion

We have reviewed the licensee's information and, in general, find that the licensee's response is adequate.

#### 4. ITEM 2.2.1.1 - IDENTIFICATION CRITERIA

##### 4.1 Guideline

The applicant or licensee should confirm that their program used for equipment classification includes criteria used for identifying components as safety-related.

##### 4.2 Evaluation

The licensee states that components that are part of safety-related systems are classified as safety-related. Component and system function, interfaces, General Design Criteria 10 CFR 50, ANSI N18.2 and applicable regulatory guides are cited as additional basis for classification of a component as safety-related.

##### 4.3 Conclusion

We find that the licensee has confirmed that they have identified the criteria used in the identification of safety-related components, thus meeting the requirements of Item 2.2.1.1.

## 5. ITEM 2.2.1.2 - INFORMATION HANDLING SYSTEM

### 5.1 Guideline

The licensee or applicant should confirm that the program for equipment classification includes an information handling system that is used to identify safety-related components. The response should confirm that this information handling system includes a list of safety-related equipment and that procedures exist which govern its development and validation.

### 5.2 Evaluation

The licensee's submittal identifies the Q-list as the information handling system that lists safety-related structures, systems, components and parts. The description states that the Q-list is developed, reviewed, approved and controlled in accordance with Quality Assurance Program procedures. The station manager maintains the Q-list. Changes to the Q-list are the responsibility of the managers of the Nuclear Engineering Department, the Safety Department, the Technical Department and the Project Manager.

### 5.3 Conclusion

We find that the information contained in the licensee's submittals is sufficient for us to conclude that the licensee's information handling system for equipment classification meets the guideline requirements. Therefore, the information provided by the licensee for this item is acceptable.

## 6. ITEM 2.2.1.3 - USE OF EQUIPMENT CLASSIFICATION LISTING

### 6.1 Guideline

The licensee's or applicant's description should confirm that their program for equipment classification includes criteria and procedures governing the use of the equipment classification information handling system to determine that an activity is safety-related and what procedures for maintenance, surveillance, parts replacement and other activities defined in the introduction to 10 CFR 50, Appendix B, apply to safety-related components.

### 6.2 Evaluation

The licensee states that procedures are written in consultation with the Q-list to determine if an activity is safety-related. The procedure (and this is audited by the Quality Assurance Department) then is identified as safety-related or non-safety-related. The licensee describes how each station organization verifies that a given procedure is current.

### 6.3 Conclusion

We find that the licensee's description of plant administrative controls and procedures meets the requirements of this item and is, therefore, acceptable.

## 7. ITEM 2.2.1.4 - MANAGEMENT CONTROLS

### 7.1 Guideline

The applicant or licensee should confirm that the management controls used to verify that the procedures for preparation, validation and routine utilization of the information handling system have been followed.

### 7.2 Evaluation

The licensee's response states that their Quality Assurance Program serves as the method of managerial control. These controls identify management responsibilities and are stated to require strict adherence to procedures, applicable interdisciplinary reviews and control of documentation. Quality assurance reviews, surveillances and audits assure that the programs and their implementation are correct.

### 7.3 Conclusion

We find that the management controls used by the licensee assure that the information handling system is maintained, is current and is used as intended. Therefore, the licensee's response for this item is acceptable.

## 8. ITEM 2.2.1.5 - DESIGN VERIFICATION AND PROCUREMENT

### 8.1 Guideline

The applicant's or licensee's submittal 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 the applicant's/licensee's receipt of testing documentation to support 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.

### 8.2 Evaluation

The licensee's submittal specifies that Material Control Procedures S0123-XI-1.0, 2.0 and 2.1 require the application of the proper technical and quality requirements. Inspections and audits imposed by these procedures are used to assure the appropriate design and manufacture. The environmental qualification package must be completed, by remedial action if necessary, before an item is used in plant operation.

### 8.3 Conclusion

The licensee's response for this item is considered to be complete. The information provided addresses the concerns of this item and is acceptable.

9. ITEM 2.2.1.6 - "IMPORTANT TO SAFETY" COMPONENTS

9.1 Guideline

Generic Letter 83-28 states that the licensee's equipment classification program 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 the licensee to furnish this information as part of their response, review of this item will not be performed.

## 10. CONCLUSION

Based on our review of the licensee's response to the specific requirements of Item 2.2.1, we find that the information provided by the licensee to resolve the concerns of Items 2.2.1.1, 2.2.1.2, 2.2.1.3, 2.2.1.4 and 2.2.1.5 meet the requirements of Generic Letter 83-28 and is acceptable. Item 2.2.1.6 was not reviewed as noted in Section 9.1.

## 11. 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 (M. O. Medford) to Director, Office of Nuclear Reactor Regulation, NRC (D. M. Crutchfield), "Generic Letter 83-28: Required Actions Based on Generic Implications of Salem ATWS Events," November 28, 1983.

BIBLIOGRAPHIC DATA SHEET

SEE INSTRUCTIONS ON THE REVERSE

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