ENCLOSURE 1

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

SAFETY EVALUATION REPORT
DIABLO CANYON NUCLEAR POWER PLANT, UNITS 1&2
DOCKET NO. 50-275/323
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 handing 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 Diablo Canyon Nuclear Power Plant, Units 1&2 submitted response to Generic Letter 83-28, Item 2.2.1 in a submittal dated June 30, 1987. We have evaluated this response and find that it is acceptable.

2.0 EVALUATIONS AND CONCLUSIONS

In these sections the licensee's response 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 states that the criteria for the identification of systems, structures and components as safety-related is developed in the Nuclear Engineering Manual Procedure (NEMP) 3.1, "Classification of Structures, Systems, and Components." These criteria also appear in the Q-List which lists all safety related structures, systems, and components. The criteria state that a component is considered to be safety-related if it is required to assure (following a design basis event): (1) the integrity of the reactor coolant pressure boundary, (2) the capability to shut down the reactor and to maintain it in a safe shutdown condition, and (3) the capability to prevent or to mitigate consequential offsite exposures.

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 submittals identify the hard copy Q-list as the information handling system that lists safety-related structures, systems, components and parts. It was developed in accordance with NEMP 3.1. The Plant Information Management System (PIMS) is a computerized data base which will eventually replace the Q-list. Currently the two systems co-exist with the Q-list as the governing document. The licensee briefly described the methods used for the development of these systems. The Quality Control and Quality Support departments are validating the data base. The licensee states that approved procedures are followed to modify either the Q-list or the PIMS.

Conclusion:

We conclude this description of the licensee's information handling system shows that it meets the staff requirements 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 describes the use of the PIMS and the Q-list in facilitating and tracking the status of the safety-related work activities identified above. The licensee has shown how procedures to be used in the above activities are identified as safety-related. NPG Procedure 5.6 is the controlling procedure for classifying replacement parts by use of the Q-list. NEMP 3.12, "Spare and Replacement Parts Evaluation," is followed if replacement parts cannot meet the original design requirements.

Conclusion:

We conclude that the licensee has described plant administrative controls and procedures which meet the staff requirements for this item and are 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's response states that their Quality Assurance (QA) Manual serves as the method of managerial control and meets the requirements of 10 CFR 50, Appendix B. The QA Manual is the basis for the Nuclear Engineering Manual which provides the procedural controls over equipment classification. Quality Assurance approves these procedures and provides regular audits to ensure that they are used properly.

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:

Procurement of safety-related components and parts is controlled by NPG Procedures 5.2 through 5.12, NEMP 3.12, 4.1, and 4.2. These procedures control safety classification, specification of technical requirements, receipt inspection, documentation review, and the supplier's quality assurance program including required testing and documentation of testing.

Conclusion:

We find the licensee's procedures meet 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 a submittal dated June 30, 1987. This submittal describe 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, Pacific Gas and Electric Company (J. D. Shiffer) to NRC, "Generic Letter 83-28, Items 2.2.1 and 2.2.2," June 30, 1987, DCL-87-156.