

March 2, 1987

Docket No. 50-220

Mr. Charles V. Mangan
Senior Vice President
Niagara Mohawk Power Corporation
301 Plainfield Road
Syracuse, New York 13212

Dear Mr. Mangan:

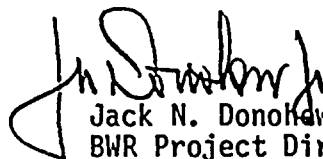
SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - GENERIC LETTER 83-28, ITEM 2.2
(PART 1) (TAC 53692)

Re: Nine Mile Point Nuclear Station, Unit No. 1

In letters dated November 8, 1983 and December 31, 1985, you submitted responses to Item 2.2 (Part 1) of Generic Letter 83-28. The staff has reviewed the available information and finds that it needs the information and/or clarification requested in the enclosure in order to complete its review. You should provide the requested information on a schedule to be negotiated with your NRC Project Manager.

The reporting and/or recordkeeping requirements contained in this letter affect fewer than ten respondents; therefore, OMB clearance is not required under PL 96-511.

Sincerely,



Jack N. Donohew, Jr., Acting Director
BWR Project Directorate #1
Division of BWR Licensing

8703110256 870302
PDR ADDOCK 05000220
P PDR

Enclosure:
Information Request

cc w/enclosure:
See next page

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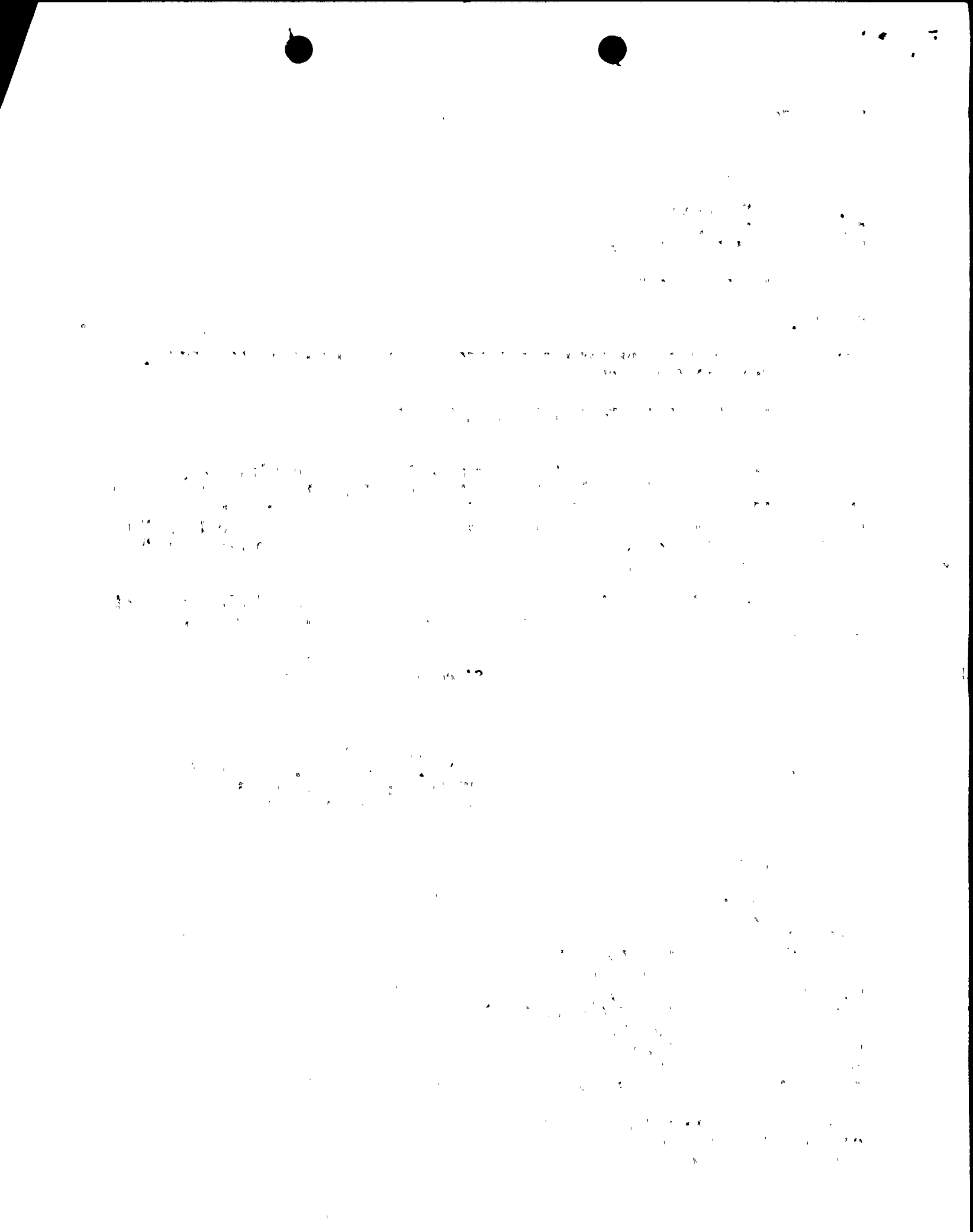
Docket File
NRC-PDR
Local PDR
BWD1 Reading
JKelly
NThompson
JPartlow
ACRS (10)

Nine Mile File
CJamerson
RBernero
OGC-BETH (Info Only)
EJordan
BGrimes
ATOalston
JZwolinski

DBL:BWD1
CJamerson
2/27/87

DBL:BWD1JK
JKelly:jg
3/2/87

DBL:BWD1
JDonohew
3/2/87



Mr. C. V. Mangan
Niagara Mohawk Power Corporation

Nine Mile Point Nuclear Station,
Unit No. 1

cc:

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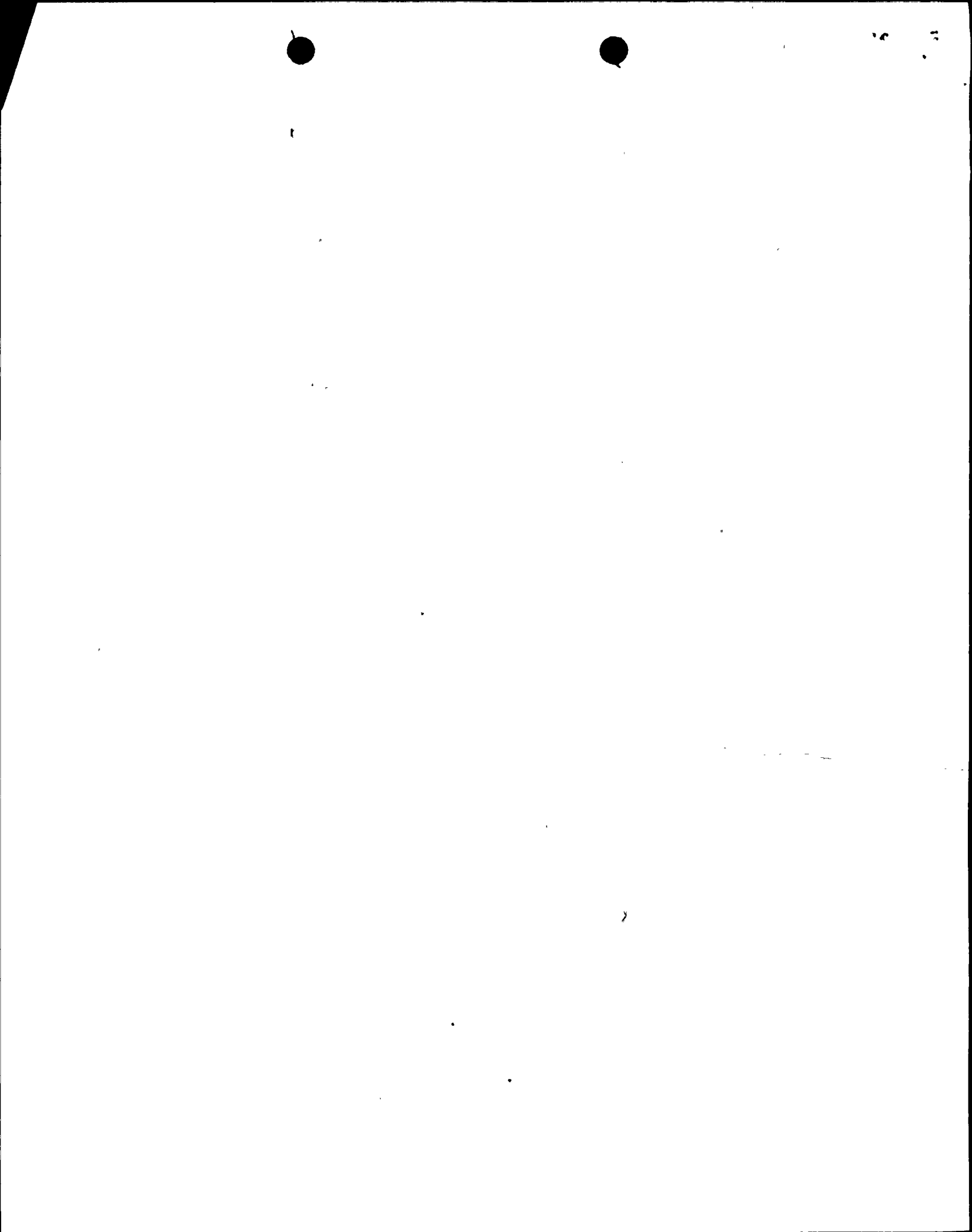
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ENCLOSURE

REQUEST FOR ADDITIONAL INFORMATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO ITEM 2.2 (PART 1) OF GENERIC LETTER 83-28
EQUIPMENT CLASSIFICATION (ALL OTHER SAFETY-RELATED COMPONENTS)
NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT NUCLEAR STATION, UNIT NO. 1
DOCKET NO. 50-220

The licensee for Nine Mile Point Nuclear Station, Unit No. 1 responded to Item 2.2 (Part 1) of Generic Letter 83-28 in submittals dated November 8, 1983, and December 31, 1985. The staff has reviewed these responses and finds additional information is needed for some of the sub-items of Item 2.2 (Part 1). The review guidelines used by the staff for these sub-items are listed below, followed by a brief evaluation of the licensee's submittals, and a summation of the additional information requested by the staff.

Item 2.2.1 - Program

Guideline

Licensees and applicants should submit a program description that provides assurance that all safety-related components are designated as safety-related in all plant documents, drawings, procedures, and in information handling systems that are used in accomplishing safety-related activities such as work orders for repair, maintenance, and surveillance testing and orders for procurement of replacement parts.

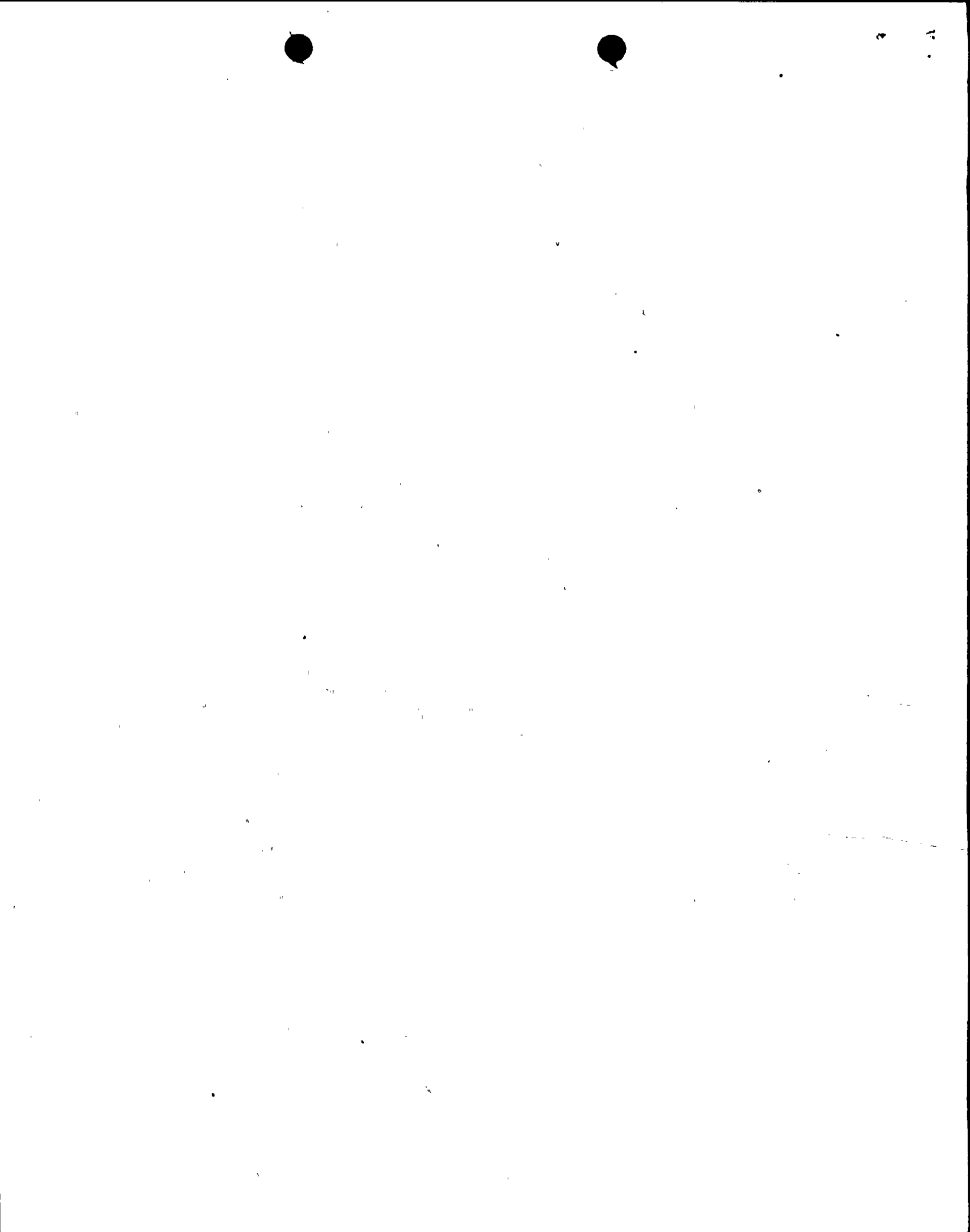
Evaluation

The licensee states that the Equipment Classification List (O-list) is the information handling system referred to. However, the licensee has not stated that all safety-related components are identified as such on all plant documents, drawings and procedures. The licensee should verify that all safety-related parts and components are identified as such on all plant documents, drawings, and procedures used in accomplishing safety-related activities.

Item 2.2.1.1 - Identification Criteria

Guideline

The criteria for identifying components as safety related should be presented. This should include a description of the means for handling sub-components or parts and procedures for initiating the identification of components as safety related or non safety related if no previous classification existed.



Evaluation

The licensee states that Engineering Procedure EP 020 is used to determine whether a component or part is safety related, but does not provide a description of this procedure. The licensee's response also refers to Regulatory Guide 1.26, Revision 3 dealing with quality group classification. The licensee should describe the criteria used in the classification of safety-related structures, systems, components and parts along with a detailed description of the procedural controls governing the inclusion or deletion of components, sub-components and parts to its listing of safety-related items.

Item 2.2.1.2 - Information Handling System

Guideline

The licensee's description of the information handling system for component classification should confirm that a listing of safety-related equipment detailed to the component level has been compiled that includes such components as switches, motors, relays, transmitters, pumps, pipes, fittings, tanks, and valves. The description should show (a) how the listing was originally prepared; (b) how new safety-related items are entered; (c) how changes in classification of listed items are made; (d) how listed items are verified; (e) how unauthorized changes to the listing are prevented; and (f) how the listing will be maintained and distributed to users as an official, single, consistent, and unambiguous version.

Evaluation

The licensee describes how the Q-list was originally prepared in accordance with Engineering Procedure EP 020. The Q-list for Unit 1 is included as an appendix to that procedure. Engineering Procedure EP 190 provides the means for new safety-related items to be entered into the Q-list or to change the classification of existing entries of the Q-list. The licensee's submittal does not describe how the listed items are verified as correctly entered, how unauthorized changes to the Q-list are prevented, nor how the listing is maintained and distributed as an official, single, consistent and unambiguous document. The licensee should provide additional information describing how the listed items are verified, how unauthorized changes are prevented and how the listing is maintained and controlled as an official, single, consistent and unambiguous version as indicated in guideline items (d), (e) and (f) above.

Item 2.2.1.3 - Use of Equipment Classification Listing

Guideline

The licensee's description should show how station personnel use the equipment classification information handling system to determine: (a) when an activity is safety related, and (b) what procedures are to be used for maintenance work, routine surveillance testing, accomplishment of design changes, performance of engineering support work, accomplishment of setpoint changes, and performance of special tests or studies.



Evaluation

The licensee's response describes the utilization of the Q-list to determine when an activity is safety-related. The licensee states that procedural checks and balances are utilized to preclude non-safety-related procedures being applied to safety-related equipment. However, the licensee did not describe how the Q-list was consulted to determine the correct use of procedures for such activities as those listed in the Guideline above. The licensee should address how the equipment classification information handling system is used by station personnel to trigger the use of the appropriate procedures for the accomplishment of such activities as design changes, performance of engineering support work, the accomplishment of setpoint changes and in the performance of special tests and studies.

Item 2.2.1.5 - Design Verification and Procurement

Guideline

The licensee's submittal should show that the specifications for procurement of replacement safety-related components and parts require that the supplier include in their documentation, verification of design capability and evidence of testing that qualifies the components and parts for service under the expected conditions over the service life.

Evaluation

The licensee states that engineering procedures, such as EP 90, "Controlled Design and Design Verification" and EP 100, "Control of Procurement Activities," contain requirements concerning design verification and qualification testing. The requirement for the vendor to submit evidence of testing is not specifically addressed by the licensee. The licensee should describe how procurement specifications specifically require the supplier to include verification of design capability and evidence of testing that qualifies the components and parts for service under the expected conditions over the life of the component or part.

