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INFORMAL REPORT

CONFORMANCE TO GENERIC LETTER 83-28, ITEM 2.2.2--VENDOR INTERFACE PROGRAMS FOR ALL OTHER SAFETY-RELATED COMPONENTS: ST. LUCIE-1 AND -2

Alan C. Udy

EG&G Idaho

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DISCLAIMER

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TECHNICAL EVALUATION REPORT

CONFORMANCE TO GENERIC LETTER 83-28, ITEM 2.2.2-- VENDOR INTERFACE PROGRAMS FOR ALL OTHER SAFETY-RELATED COMPONENTS: ST. LUCIE-1 AND -2

Docket Nos. 50-335/50-389

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ABSTRACT

This EG&G Idaho, Inc., report provides a review of the submittals from the Florida Power and Light Company regarding conformance to Generic Letter 83-28, Item 2.2.2, for Unit Nos. 1 and 2 of the St. Lucie Station.

Docket Nos. 50-335/50-389
TAC Nos. 53718/53719

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 Engineering and System Technology, by EG&G Idaho, Inc., NRR and I&E Support Branch.

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Docket Nos. 50-335/50-389
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CONFORMANCE TO GENERIC LETTER 83-28, ITEM 2.2.2-- VENDOR INTERFACE PROGRAMS FOR ALL OTHER SAFETY-RELATED COMPONENTS: ST. LUCIE-1 AND -2

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 unit 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[1]) 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 responses submitted by the Florida Power and Light Company, the licensee for the St. Lucie Station, for Item 2.2.2 of Generic Letter 83-28. The documents reviewed as a part of this evaluation are listed in the references at the end of this report.

2. REVIEW CONTENT AND FORMAT

Item 2.2.2 of Generic Letter 83-28 requests the licensee or applicant to submit, for the staff review, a description of their programs for interfacing with the vendors of all safety-related components including supporting information, in considerable detail, as indicated in the guideline section for each case within this report.

These guidelines treat cases where direct vendor contact programs are pursued, treat cases where such contact cannot practically be established, and establish responsibilities of licensees/applicants and vendors that provide service on safety-related components or equipment.

As previously indicated, the cases of Item 2.2.2 are 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 their vendor interface program for safety-related components and equipment are drawn.

3. ITEM 2.2.2 - PROGRAM DESCRIPTION

3.1 Guideline

The licensee or applicant response should describe their program for establishing and maintaining interfaces with vendors of safety-related components which ensures that vendors are contacted on a periodic basis and that receipt of vendor equipment technical information (ETI) is acknowledged or otherwise verified.

This program description should establish that such interfaces are established with their NSSS vendor, as well as with the vendors of key safety-related components such as diesel generators, electrical switchgear, auxiliary feedpumps, emergency core cooling system (ECCS) pumps, batteries, battery chargers, and valve operators, to facilitate the exchange of current technical information. The description should verify that controlled procedures exist for handling this vendor technical information which ensure that it is kept current and complete and that it is incorporated into plant operating, maintenance and test procedures as is appropriate.

3.2 Evaluation

The licensee for St. Lucie responded to these requirements with submittals dated November 8, 1983,[2] March 1, 1984,[3] October 30, 1984,[4] September 9, 1986[5] and October 2, 1986.[6] These submittals include information that describes their vendor interface programs. 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. We have reviewed the information submitted and note the following.

The licensee's response states that they actively participate in the Nuclear Utility Task Action Committee (NUTAC) program. The Vendor Equipment Technical Information Program (VETIP) was developed by NUTAC. VETIP includes interaction with the NSSS vendor and with other electric utilities. However, the licensee has not described their vendor interface program with the NSSS

vendor nor with vendors of other safety-related equipment. They do state however, that they do not have a formal program for interfacing with all vendors of safety-related equipment. The guidelines for Section 2.2.2 of the generic letter state that formal vendor interfaces should be established with the NSSS vendor and with vendors of other safety-related equipment. The licensee reports that new or revised procedures that fully implement the NUTAC/VETIP program are in use.

3.3 Conclusion

We conclude that the licensee's response regarding program description is not complete. The licensee should verify that vendor contacts are established on a regular basis with the NSSS vendor and with vendors of other safety-related equipment (such as diesel generator and Class 1E switchgear manufacturers) to ensure that vendor information is current and up to date.

4. PROGRAM WHERE VENDOR INTERFACE CANNOT PRACTICABLY BE ESTABLISHED

4.1 Guideline

The licensee/applicant response should describe their program for compensating for the lack of a formal vendor interface where such an interface cannot be practicably established. This program may reference the NUTAC/VETIP program, as described in INPO 84-010, issued in March 1984. If the NUTAC/VETIP program is referenced, the response should describe how procedures were revised to properly control and implement this program and to incorporate the program enhancements described in Section 3.2 of the NUTAC/VETIP report. The use of the NUTAC/VETIP program, instead of either a formal interface with each vendor of safety-related equipment or a program to periodically contact each vendor of safety-related equipment, will not relieve the licensee/applicant of his responsibility to obtain appropriate vendor instructions and information where necessary to provide adequate confidence that a structure, system or component will perform satisfactorily in service and to ensure adequate quality assurance in accordance with Appendix B to 10 CFR Part 50.

4.2 Evaluation

The licensee provided a brief description of the vendor interface program. Their description references the NUTAC/VETIP program. The licensee states that plant instructions and procedures are being used to assure that the VETIP program is properly controlled and implemented.

VETIP is comprised of two basic elements related to vendor equipment problems; the Nuclear Plant Reliability Data System (NPRDS) and the Significant Event Evaluation and Information Network (SEE-IN) programs. VETIP is designed to ensure that vendor equipment problems are recognized, evaluated and corrective action taken.

Through participation in the NPRDS program, the licensee submits engineering information, failure reports and operating histories for review under the SEE-IN program. Through the SEE-IN program, the Institute of Nuclear Power Operations (INPO) reviews nuclear plant events that have been reported through the NPRDS programs, Nuclear Network and NRC reports. Based on the significance of the event, as determined by the screening review, INPO issues a report to all utilities outlining the cause of the event, related problems and recommends practical corrective actions. These reports are issued in Significant Event Reports, and Significant Operating Experience Reports and as Operations and Maintenance Reminders. Upon receipt of these documents, the licensee, as part of the NUTAC/VETIP program, evaluates the information to determine applicability to the facility. This evaluation is then documented and corrective actions taken as determined necessary. This evaluation is stated to be covered by procedures.

The licensee's response states that procedures exist to review and evaluate incoming equipment technical information and to incorporate it into existing procedures.

4.3 Conclusion

We find that the licensee's response to this concern is adequate and, therefore, acceptable.

5. RESPONSIBILITIES OF LICENSEE/APPLICANT AND VENDOR THAT PROVIDE SERVICE ON SAFETY-RELATED EQUIPMENT

5.1 Guideline

The licensee/applicant response should verify that the responsibilities of the licensee or applicant and vendors that provide service on safety-related equipment are defined such that control of applicable instructions for maintenance work on safety-related equipment are provided.

5.2 Evaluation

The licensee's response commits to implement the NUTAC/VETIP program. They further state that they have revised their programs and procedures to adequately implement the internal handling of vendor-supplied services portion of the VETIP program. The VETIP guidelines include implementation procedures for the internal handling of vendor services.

5.3 Conclusion

We find that the information contained in the licensee's submittals is sufficient for us to conclude that the licensee's and vendor's responsibilities are defined and controlled appropriately. Therefore, the information provided by the licensee for this item is acceptable.

6. CONCLUSION

Based on our review of the licensee's response to the specific requirements of Item 2.2.2, we find that the information provided by the licensee to resolve the concerns of this program do not meet the requirements of Generic Letter 83-28.

The licensee should show that a program of regular vendor contact has been established (Section 3.3).

7. REFERENCES

1. Letter, NRC (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, Florida Power & Light Company (J. W. Williams, Jr..) to NRC (D. G. Eisenhut), "Generic Letter 83-28," November 8, 1983, L-83-554.

3. Letter, Florida Power & Light Company (J. W. Williams, Jr.) to NRC (D. G. Eisenhut), "Generic Letter 83-28 Section 2.2.2," March 1, 1984, L-84-50.

4. Letter, Florida Power & Light Company (J. W. Williams, Jr.) to NRC (D. G. Eisenhut), "Generic Letter 83-28 Section 2.2.2," October 30, 1984, L-84-306.

5. Letter, Florida Power & Light Company (C. O. Woody) to NRC (A. C. Thadani), "Generic Letter 83-28; Item 2.2 and 4.5.3," September 9, 1986, L-86-364.

6. Letter, Florida Power & Light Company (C. O. Woody) to NRC (A. C. Thadani), "Generic Letter 83-28, Items 2.2 and 4.5.3," October 2, 1986, L-86-396.

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