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LEMPGES, T. E. Niagara Mohawk Power Corp.
RECIP. NAME RECIPIENT AFFILIATION
ADENSAM, E. G. BWR Project Directorate 3

SUBJECT: Forwards suppl to 840410 response to Generic Ltr 83-28. Topics addressed include post-trip review program description, post-trip data & info capability, equipment classification & vendor interface re reactor trip sys parts.

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NIAGARA MOHAWK

NIAGARA MOHAWK POWER CORPORATION/300 ERIE BOULEVARD WEST, SYRACUSE, N.Y. 13202/TELEPHONE (315) 474-1511

December 20, 1985
(NMP2L 0566)

Ms. Elinor G. Adensam, Director
BWR Project Directorate No. 3
U.S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Washington, DC 20555

Dear Ms. Adensam:

Re: Nine Mile Point Unit 2
Docket No. 50-410

Attached are six additional responses (Sections 1.1, 2.1, 2.2, 2.2.2, 3.1, 3.2 and 4.5) concerning Generic Letter 83-28. These responses are in addition to the previous responses sent to the Nuclear Regulatory Commission on April 10, 1984 (G.K. Rhode (NMPC) to A. Schwencer (NRC)).

Very truly yours,

T. E. Lempges
Vice President
Nuclear Generation

TEL/TL:rla
1156G
Attachments

xc: R. A. Gramm, NRC Resident Inspector
Project File (2)

A055
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A00.

EB (LIAW)
PSB (L. HULMAN)
EICSB (SRINIVASAN)
RSB (ACTING)
FOB (VASSALLO)
AD - G. LAINAS (Ltr only)

ATTACHMENT

# ADDITIONAL INFORMATION CONCERNING GENERIC LETTER 83-28

## I. POST-TRIP REVIEW (PROGRAM DESCRIPTION AND PROCEDURE SECTION 1.1)

### Position

Licensees and applicants shall describe their program for ensuring that unscheduled reactor shutdowns are analyzed and that a determination is made that the plant can be restarted safely. A report describing the program for review and analysis of such unscheduled reactor shutdowns should include, as a minimum:

1.1.1. The criteria for determining the acceptability of restart.

Response:

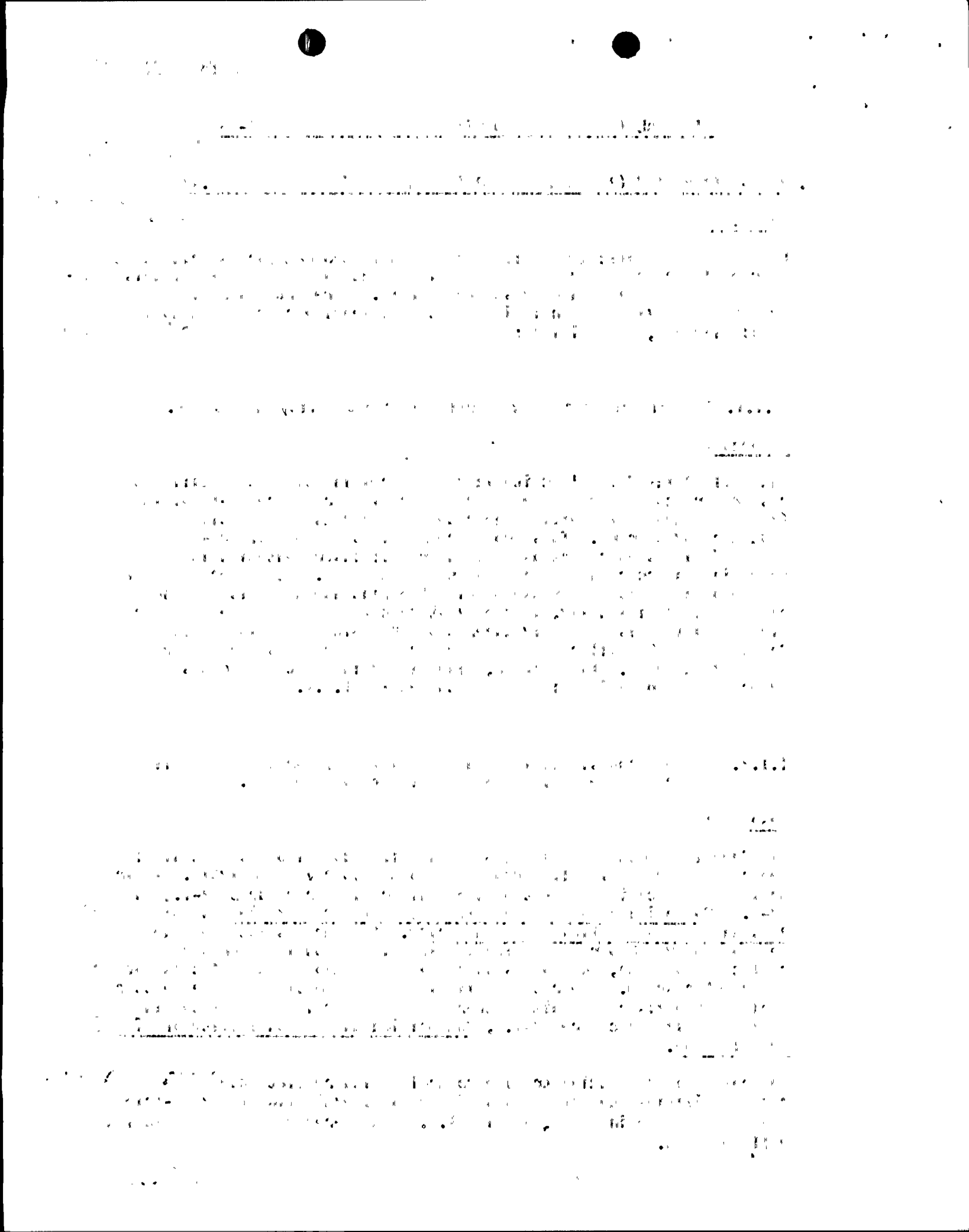
Nine Mile Point Unit 2's criteria for determining the acceptability of restart are contained in the Interim Operating Procedure N2-IOP-101A (Plant Startup) which will be upgraded to a permanent operating procedure by startup. This procedure requires the use of pre-startup checkoff sheets which are used to ensure all instrumentation is operating in accordance with plant specifications. The order to start up the plant is issued by the Station Superintendent or his designated alternate. Additionally, in the event that the cause of the scram or plant transient is not fully understood, the Site Operations Review Committee (SORC) will review the scram reports prepared per Niagara Mohawk Procedures. In addition, Nine Mile Point Unit 2 endorses the BWR Owners' Group position with regard to Section 1.1.1.

1.1.2. The responsibilities and authorities of personnel who will perform the review and analysis of these events.

Response:

The Superintendent Operations, Station Shift Supervisor and technical department personnel will perform the post-trip review analysis. Their duties are specifically stated in Administrative Procedures AP-1.2 and AP-1.3, Composition and Responsibility of Unit Organization and Personnel Responsibilities and Authority. They are assisted by the Reactor Analyst Department which is directly responsible for the collection of data, and to assist in the evaluation as to the cause of the reactor scram. The responsibilities and authorities of the Reactor Analyst Supervisor and Unit Reactor Analyst Supervisor are stated in the Administrative Procedure AP-1.1, Composition and Responsibility of Site Organization.

Our review of the administrative controls which regulate the responsibilities and authorities of personnel evaluating the Post-Trip Review, meet the intent of Section 1.1.2 and therefore no further action will be taken.



1.1.3 The necessary qualifications and training for the responsible personnel.

Response:

The analysis of unscheduled shutdowns at Nine Mile Point Unit 2 will be performed by a select group of trained and qualified individuals. The education, training, and job related experience of these people provide the basis for the evaluation needed to make the post-trip review and restart recommendation.

The qualifications and training for the positions of Station Superintendent, Superintendent Operations, and Unit Reactor Analyst Supervisor comply with the requirements of ANSI/ANS 3.1-1978 and 10CFR55. The Station Shift Supervisor and Shift Technical Advisor also meet the requirements of NTP-10 (Training of Licensed Operator Candidates) and NTP-11 (Licensed Operator Retraining).

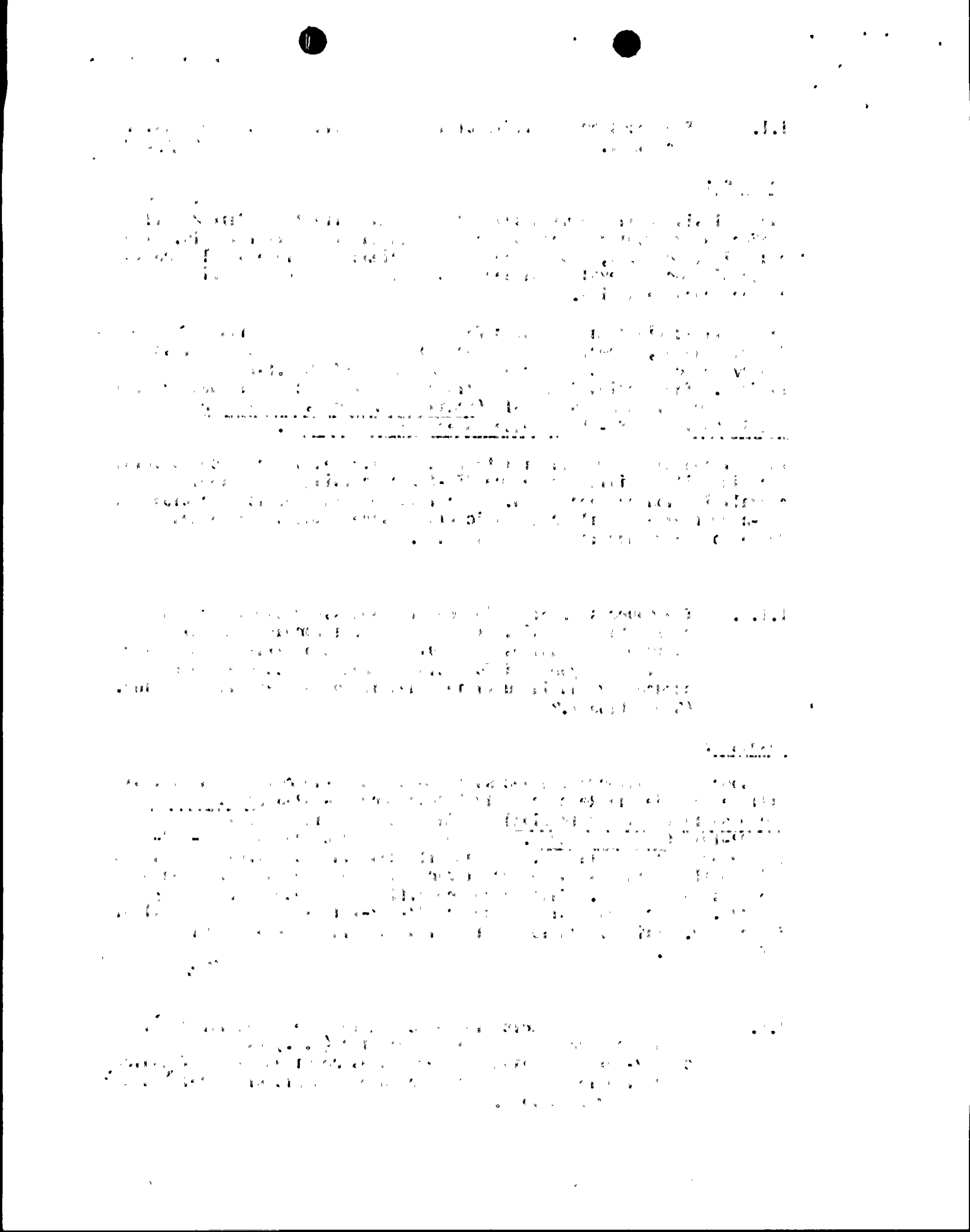
In addition to all the initial training requirements for these positions per Nine Mile Training Procedure NTP-11, retraining and periodic requalification are performed. Retraining examines plant operations and off-normal events while requalification ensures that the recommended degree of knowledge is being maintained.

1.1.4. The sources of plant information necessary to conduct the review and analysis. The sources of information should include the measures and equipment that provide the necessary detail and type of information to reconstruct the event accurately and in sufficient detail for proper understanding. (See Action 1.2)

Response:

The sources of information necessary to conduct the review and analysis will be provided in Reactor Analyst Procedure N2-RAP-6 (Post Reactor Scram Analysis and Evaluation) and Interim Operating Procedure N2-IOP-101A (Plant Startup). The Reactor Analyst Procedure N2-RAP-6 is in the process of being written and will contain data collection sheets which will provide the necessary information to make an evaluation of the cause of a scram. This procedure will be completed prior to startup. Interim Operating Procedure N2-IOP-101A is currently available for review. This evaluation will include the information provided by a GETARS system.

1.1.5 The methods and criteria for comparing the event information with known or expected plant behavior (e.g., that safety-related equipment operates as required by the Technical Specifications or other performance specifications related to the safety function).



Response:

The individuals responsible for the event analysis are qualified per ANSI/ANS 3.1-1978. At their disposal will be records of previous reactor trips and the Final Safety Analysis Report Data which are used at their discretion for comparing the transient to expected responses.

Since Nine Mile Point Unit 2 will have sufficient data capability for comparing these events, and the operating personnel are trained and qualified to perform this evaluation, no further action will be taken at this time.

1.1.6 Criteria for Determining the Need for Independent Assessment

Response:

In the event that the scram report, Post Reactor Scram Analysis and Evaluation procedure, and/or the startup checkoff sheets reveal a condition that is not understood, the station superintendent will not authorize restart. Instead, the appropriate staff members (representing the Site Operations Review Committee) will be requested to assist in the evaluation of the event.

Additionally, Administrative Procedure AP-3.4.1 (Administration of Technical and Safety Reviews) provides further guidance for determining the need for independent assessment.

II. POST-TRIP REVIEW - DATA AND INFORMATION CAPABILITY (1:2)

Niagara Mohawk will provide a response to this section by fuel load.

III. EQUIPMENT CLASSIFICATION AND VENDOR INTERFACE

(Reactor Trip System Components) (Section 2.1)

Niagara Mohawk does not currently plan to develop a specific list of components that would comprise a reactor trip system. The reactor trip function is accomplished at Nine Mile Point Unit 2 by utilizing redundant plant process instrumentation that input to a one-out-of-two twice logic system. These signals initiate a reactor trip (rapid control rod insertion i.e. scram) by deenergizing solenoid operated scram pilot valves that vent air from the reactor scram valves. Additional information is available in our current FSAR Section 7.2, "Reactor Protection (Trip) System (RPS) Instrumentation and Control."

The components that contribute to the reactor trip function are contained in several systems rather than one reactor trip system. Those systems whose components contribute to the reactor trip function include reactor protection system, reactor vessel instrumentation system, neutron monitoring system and control rod drive system. Therefore, a new system identified as the reactor trip system would cause unnecessary inconsistencies with existing Nine Mile Point Unit 2 system nomenclature. This would require extensive revision to existing documentation and a training program with no resultant enhancement of safety.

However, Niagara Mohawk will review maintenance procedures to ensure that safety classification information is included with the appropriate maintenance documentation.

Niagara Mohawk will review General Electric Service Information letters pertaining to the reactor trip components. Appropriate changes to equipment or procedures deemed necessary will be incorporated.

As a part of the startup of Nine Mile Point Unit 2, vendor manuals are being compiled for the appropriate NMP2 equipment. The task will be complete prior to startup. The permanent update program will be completed prior to commercial operation and will be onsite for your review.

IV. EQUIPMENT CLASSIFICATION AND VENDOR INTERFACE

(Programs For All Safety-Related Components) (2.2)

2.2.1.3 A description of the process by which station personnel use this 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 10CFR50, Appendix B, apply to safety-related components.

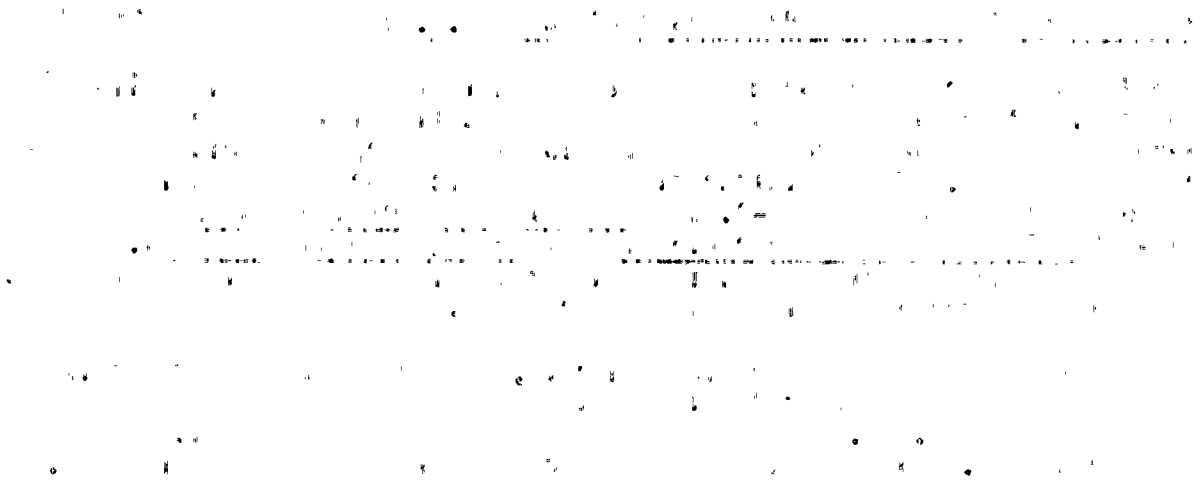
Response:

The following is a description of the process of determining if an activity is safety related. The supervisor of the department responsible for the activity has the responsibility to utilize the Equipment Classification List (Q-List) to determine the equiment classification. Documents such as work requests and purchase requisitions are reviewed and approved by the Quality Assurance Department. Activities such as surveillance or preventative maintenance are covered by procedures which are reviewed per technical specification requirements. The final administrative control before work occurs is the requirement that the Shift Supervisor grant permission. Based on the training, experience and knowledge of Technical Specifications required to fill the position, the Shift Supervsor can determine if the correct practices are to be used. This control includes signoffs in the procedures, work requests and markups (tags) to be used. It is the intent of the process at Nine Mile Point Unit 2 to have checks and balances in the system to assure that an error on the part of an individual will not result in "non-safety related practices" being applied to safety-related equipment.

V. VENDOR INTERFACE PROGRAM "RESPONSE" (Section 2:2:2)

The Vendor Interface Program currently being implemented at Nine Mile Point Unit 2 consists of procedures and data collection requirements necessary to perform a complete evaluation on vendor/engineering recommendations. The Administrative and Technical procedures which support this program are AP-3.4.2 (Operations Experience Assessment) and TDP-5 (Administration of Operational Engineering Assessment Items). These procedures provide an engineering evaluation for tracking an item until it is incorporated into plant operations.

In addition to our administrative controls, Niagara Mohawk was an active participant in the Nuclear Utility Task Action Committee formed to address Section 2.2.2. Niagara Mohawk is currently in compliance with their response. Therefore, no further action wil be taken at this time.



VI. POST MAINTENANCE TESTING (REACTOR TRIP SYSTEM COMPONENTS) (SECTION 3.1)

Niagara Mohawk is revising Administrative Procedure AP-5 (Procedure for Repairs) which will require that post-maintenance testing be performed on applicable safety-related equipment. This procedure will be revised by startup. Technical specifications will also be reviewed to ensure that post-maintenance testing be performed on applicable safety-related equipment.

Niagara Mohawk will review General Electric Service Information letters for test guidance on reactor trip system components and incorporate the appropriate changes into procedures.

The technical specifications will be reviewed to ensure that post-maintenance test procedures will not degrade safety. These actions will be completed prior to startup.

VII. POST-MAINTENANCE TESTING (ALL OTHER SAFETY-RELATED COMPONENTS) (3.2)

Niagara Mohawk is revising Administrative Procedure AP-5 (Procedure for Repair) which will require that post-maintenance testing be performed on applicable safety-related equipment. This procedure will be revised by startup. Technical specifications will also be reviewed to ensure that post-maintenance testing be performed on applicable safety-related equipment.

Niagara Mohawk will review General Electric Service Information letters for test guidance on safety-related systems and incorporate the appropriate changes into procedures.

Technical specifications will be reviewed to ensure that post-maintenance test procedures will not degrade safety. These actions will be completed prior to startup.

VIII. REACTOR TRIP SYSTEM RELIABILITY (SYSTEM FUNCTIONAL TESTING) (SECTION 4.5)

Niagara Mohawk will perform testing of backup scram valves (including initiating circuitry) during refueling outages in lieu of on-line testing. This guidance was provided in a letter dated March 19, 1985, from Mr. A. Schwencer to B. G. Hooten. This response satisfies the concerns of Section 4.5.

TABLE 1

STATUS OF GENERIC LETTER 83-28
REGULATORY ACTION ITEMS
NINE MILE POINT UNIT 2

| SECTION | TITLE | DECEMBER 1985 SCHEDULE/STATUS | COMMENTS |
|---|---|---|---|
| 1.1 | Post-Trip Review (program description and procedure) | | |
| 1.1.1 | Criteria for Determining Acceptability of Restart | Procedures to be implemented for startup. | Response in 12/20/85 letter to NRC. |
| 1.1.2 | Responsibilities and Authorities of personnel who will perform the Review and Analysis of these events | Procedures to be implemented for startup. | Response in 12/20/85 letter to NRC. |
| 1.1.3 | Qualifications and Training for the responsible Personnel | Procedures to be implemented for startup. | Response in 12/20/85 letter to NRC. |
| 1.1.4 | Source of plant information necessary to conduct the review | Procedures to be implemented for startup. | Response in 12/20/85 letter to NRC. |
| 1.1.5 | Methods and Criteria for comparing event information with known or expected plant behavior | Complete | Response in 12/20/85 letter to NRC. |
| 1.1.6 | Criteria for Determining the need for Independent Assessment | Procedures to be implemented for startup. | Response in 12/20/85 letter to NRC. |

TABLE 1

STATUS OF GENERIC LETTER 83-28
REGULATORY ACTION ITEMS
NINE MILE POINT UNIT 2

| SECTION | TITLE | DECEMBER 1985 SCHEDULE/STATUS | COMMENTS |
|---|---|---|---|
| 1.2 | Post-Trip Review - Data and Information Capability | A report will be submitted to the NRC prior to startup which describes the post-trip review and data and information capability for Nine Mile Point Unit 2 by fuel load. | |
| 1.2.1 | Capability of Assessing Sequence of Events (on-off indications) | (See Section 1.2) | |
| 1.2.1.1 | Description of Equipment (e.g. plant computer, dedicated computer, strip chart) | (See Section 1.2) | |
| 1.2.1.2 | Parameters Monitored | (See Section 1.2) | |
| 1.2.1.3 | Time Discrimination Between Events | (See Section 1.2) | |
| 1.2.1.4 | Format for Displaying Data and Information | (See Section 1.2) | |

TABLE 1

STATUS OF GENERIC LETTER 83-28
REGULATORY ACTION ITEMS
NINE MILE POINT UNIT 2

| SECTION | TITLE | DECEMBER 1985 SCHEDULE/STATUS | COMMENTS |
|---|---|---|---|
| 1.2.1.5 | Capability for Retention of Data and Information | (See Section 1.2) | |
| 1.2.1.6 | Power Source(s) (e.g., Class IE, Non-Class IE, Non-Interruptable) | (See Section 1.2) | |
| 1.2.2 | Capability for assessing the time history of analog variables needed to determine the cause of unscheduled reactor shutdowns, and the functioning of safety related equipment | (See Section 1.2) | |
| 1.2.2.1 | Brief Description of Equipment (e.g., Plant Computer, Dedicated Computer, Strip Charts) | (See Section 1.2) | |
| 1.2.2.2 | Parameters Monitored, Sampling Rate and Basis for Selecting Parameters and Sampling Rate | (See Section 1.2) | |
| 1.2.2.3 | Duration of Time History (Minutes Before Trip and Minutes After Trip) | (See Section 1.2) | |
| 1.2.2.4 | Format for Displaying Data Including Scale (Readability of Time Histories) | (See Section 1.2) | |

TABLE 1

STATUS OF GENERIC LETTER 83-28
REGULATORY ACTION ITEMS
NINE MILE POINT UNIT 2

| SECTION | TITLE | DECEMBER 1985 SCHEDULE/STATUS | COMMENTS |
|---|---|---|---|
| 1.2.2.5 | Capability for Retention of Data, Information and Physical Evidence (Both Hardware & Software) | (See Section 1.2) | |
| 1.2.2.6 | Power Source(s) (e.g., Class IE, Non-Class noninterruptable) | (See Section 1.2) | |
| 1.2.3 | Other Data and Information Provided to Assess the cause of Unscheduled Reactor Shutdowns | (See Section 1.2) | |
| 1.2.4 | Schedule for any Planned Changes to Existing Data and Information Capability | (See Section 1.2) | |
| 2.1 | Equipment Classification and Vendor Interface (Reactor Trip System Components) | | |
| | Review Maintenance Procedures (mechanical, electrical and I&C) to ensure classification information is included with the appropriate maintenance documentation. | Prior to startup | Response in 12/20/85 letter to NRC |
| | Complete investigation of SIL's pertaining to Reactor Trip Function Components and change procedures and equipment, as necessary | Prior to startup | Response in 12/20/85 letter to NRC |

TABLE 1

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NINE MILE POINT UNIT 2

| SECTION | TITLE | DECEMBER 1985 SCHEDULE/STATUS | COMMENTS |
|---|---|---|---|
| | Compile vendor manuals for appropriate NMP2 equipment | Prior to startup | Response in 12/20/85 letter to NRC |
| | Permanent update program will be completed prior to commercial operation | Prior to startup | Response in 12/20/85 letter to NRC |
| 2.2 | Equipment classification and vendor interface (programs for all safety-related components) | | |
| 2.2.1 | Describe the program for ensuring safety-related components are identified as safety-related in appropriate documentation | Complete | Response in 4/10/83 letter to NRC |
| 2.2.1.1 | Criteria for identifying components as safety-related (review engineering procedures to ensure a method exists for identifying safety-related components and services) | Procedure review to be completed prior to startup | Response in 4/10/83 letter to NRC |
| 2.2.1.2 | Description of the information handling system used to identify safety related components | Complete | Response in 4/10/83 letter to NRC |

TABLE 1

STATUS OF GENERIC LETTER 83-28
REGULATORY ACTION ITEMS
NINE MILE POINT UNIT 2

| SECTION | TITLE | DECEMBER 1985 SCHEDULE/STATUS | COMMENTS |
|---|---|---|---|
| 2.2.1.3 | Description of the process by which station personnel use this information handling system to determine that an activity is safety-related and what procedures for maintenance, surveillance parts replacement and other activities defined in 10CFR50, Appendix B, apply to safety-related components | Complete | Response in 12/20/85 letter to NRC |
| 2.2.1.4 | Description of the management controls utilized to verify that the procedures for preparation, validation and routine utilization of the information handling system have been followed | Complete | Response in 4/10/83 letter to NRC |
| 2.2.1.5 | Demonstrate that the appropriate design verification and qualification testing is specified for procurement of safety-related components | Ensure engineering procedures ensure that applicable reg-regulatory requirements design bases and quality requirements are met when obtaining material and services | Response in 4/10/83 letter to NRC |
| 2.2.1.6 | Licensees and applicants need only to submit for staff review the equipment classification program for safety-related components | Complete | Response in 4/10/84 letter to NRC |
| 2.2.2 | Vendor Interface Program | Procedures to be implemented prior to startup. | Response in 12/20/85 letter. |



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TABLE 1

STATUS OF GENERIC LETTER 83-28
REGULATORY ACTION ITEMS
NINE MILE POINT UNIT 2

| SECTION | TITLE | DECEMBER 1985 SCHEDULE/STATUS | COMMENTS |
|---|---|---|---|
| 3.1 | Post Maintenance Testing (Reactor Trip System Components) | | |
| 3.1.1 | Revise administrative procedures to ensure post-maintenance testing for Reactor Trip Components prior to startup | Review to be completed prior to startup | Response in 12/20/85 letter to NRC |
| | Review Tech Specs to ensure post-maintenance testing for Reactor Trip components prior to startup | Review to be completed prior to startup | Response in 12/20/85 letter to NRC |
| 3.1.2 | Review of SIL's recommendations to ensure appropriate test guidance is included in procedures | Review to be completed prior to startup | Response in 12/20/85 letter to NRC |
| 3.1.3 | Identify any post-maintenance test requirements in technical specifications which can be demonstrated to degrade rather than enhance safety | Review to be completed prior to startup | Response in 12/20/85 letter to NRC |
| 3.2 | Post-Maintenance Testing (all other safety-related components) | | |

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REGULATORY ACTION ITEMS
NINE MILE POINT UNIT 2

| SECTION | TITLE | DECEMBER 1985 SCHEDULE/STATUS | COMMENTS |
|---|---|---|---|
| 3.2.1 | Revise administrative procedures to ensure post-maintenance testing for safety-related equipment | Review to be complete prior to startup | Response in 12/20/85 letter to NRC |
| | Review Technical Specifications to ensure post-maintenance testing for safety-related equipment | Review to be complete prior to startup | " |
| 3.2.2 | Review of SIL's to ensure appropriate test guidance is included in procedures. | Review to be complete prior to startup | " |
| 3.2.3 | Identify any post-maintenance test requirements in technical specifications which can be demonstrated to degrade rather than enhance safety | " | " |
| 4.5 | Reactor Trip System Reliability (System Functional Testing) | Complete | Response in 12/20/85 letter to NRC |
| | Functional Testing of scram pilot valves and backup scram valves. | " | " |
| | Evaluate existing intervals for on-line functional testing required by technical specifications | " | " |

NIAGARA MOHAWK

FROM T. Loomis

S. Nicolas
R. Randall
D. LoSurdo

DISTRICT Syracuse

DATE January 2, 1986 FILE CODE

SUBJECT Commitments in Regard to Generic Letter 83-28

Attached is a draft listing of the commitments required to complete the actions identified in Generic Letter 83-28. Please review this listing and provide any comments or corrections by January 6, 1986. It is my intention to forward this list to the NMP2 site management for a formal assignment of responsibilities.

T. Loomis
Licensing Engineer

TL:ja
Attachment
xc: A. F. Zallnick, Jr
Project File (2)

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NINE MILE POINT UNIT 2

| SECTION | TITLE | DECEMBER 1985 SCHEDULE/STATUS | COMMENTS |
|---|---|---|---|
| 1.1 | Post-Trip Review (program description and procedure) | | |
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| 1.1.2 | Responsibilities and Authorities of personnel who will perform the Review and Analysis of these events | Procedures to be implemented for startup. | Response in 12/20/85 letter to NRC. |
| 1.1.3 | Qualifications and Training for the responsible Personnel | Procedures to be implemented for startup. | Response in 12/20/85 letter to NRC. |
| 1.1.4 | Source of plant information necessary to conduct the review | Procedures to be implemented for startup. | Response in 12/20/85 letter to NRC. |
| 1.1.5 | Methods and Criteria for comparing event information with known or expected plant behavior | Complete. | Response in 12/20/85 letter to NRC. |
| 1.1.6 | Criteria for Determining the need for Independent Assessment | Procedures to be implemented for startup. | Response in 12/20/85 letter to NRC. |

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| 1.2 | Post-Trip Review - Data and Information Capability | A report will be submitted to the NRC prior to startup which describes the post-trip review and data and information capability for Nine Mile Point Unit 2 by fuel load. | |
| 1.2.1 | Capability of Assessing Sequence of Events (on-off indications) | (See Section 1.2) | |
| 1.2.1.1 | Description of Equipment (e.g. plant computer, dedicated computer, strip chart) | (See Section 1.2) | |
| 1.2.1.2 | Parameters Monitored | (See Section 1.2) | |
| 1.2.1.3 | Time Discrimination Between Events | (See Section 1.2) | |
| 1.2.1.4 | Format for Displaying Data and Information | (See Section 1.2) | |

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| SECTION | TITLE | DECEMBER 1985 SCHEDULE/STATUS | COMMENTS |
|---|---|---|---|
| 1.2.1.5 | Capability for Retention of Data and Information | (See Section 1.2) | |
| 1.2.1.6 | Power Source(s) (e.g., Class IE, Non-Class IE, Non-Interruptable) | (See Section 1.2) | |
| 1.2.2 | Capability for assessing the time history of analog variables needed to determine the cause of unscheduled reactor shutdowns, and the functioning of safety related equipment | (See Section 1.2) | |
| 1.2.2.1 | Brief Description of Equipment (e.g., Plant Computer, Dedicated Computer, Strip Charts) | (See Section 1.2) | |
| 1.2.2.2 | Parameters Monitored, Sampling Rate and Basis for Selecting Parameters and Sampling Rate | (See Section 1.2) | |
| 1.2.2.3 | Duration of Time History (Minutes Before Trip and Minutes After Trip) | (See Section 1.2) | |
| 1.2.2.4 | Format for Displaying Data Including Scale (Readability of Time Histories) | (See Section 1.2) | |

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| 1.2.3 | Other Data and Information Provided to Assess the cause of Unscheduled Reactor Shutdowns | (See Section 1.2) | |
| 1.2.4 | Schedule for any Planned Changes to Existing Data and Information Capability | (See Section 1.2) | |
| 2.1 | Equipment Classification and Vendor Interface (Reactor Trip System Components) | | |
| | Review Maintenance Procedures (mechanical, electrical and I&C) to ensure classification information is included with the appropriate maintenance documentation. | Prior to startup | Response in 12/20/85 letter to NRC |
| | Complete investigation of SIL's pertaining to Reactor Trip Function Components and change procedures and equipment, as necessary | Prior to startup | Response in 12/20/85 letter to NRC |

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| | Permanent update program will be completed prior to commercial operation | Prior to startup | Response in 12/20/85 letter to NRC |
| 2.2 | Equipment classification and vendor interface (programs for all safety-related components) | | |
| 2.2.1 | Describe the program for ensuring all safety-related components are identified as safety-related in appropriate documentation | Complete | Response in 4/10/83 letter to NRC |
| 2.2.1.1 | Criteria for identifying components as safety-related (review engineering procedures to ensure a method exists for identifying safety-related components and services) | Procedure review to be completed prior to startup | Response in 4/10/83 letter to NRC |
| 2.2.1.2 | Description of the information handling system used to identify safety related components | Complete | Response in 4/10/83 letter to NRC |

TABLE 1

STATUS OF GENERIC LETTER 83-28
REGULATORY ACTION ITEMS
NINE MILE POINT UNIT 2

| SECTION | TITLE | DECEMBER 1985 SCHEDULE/STATUS | COMMENTS |
|---|---|---|---|
| 2.2.1.3 | Description of the process by which station personnel use this information handling system to determine that an activity is safety-related and what procedures for maintenance, surveillance parts replacement and other activities defined in 10CFR50, Appendix B, apply to safety-related components | Complete | Response in 12/20/85 letter to NRC |
| 2.2.1.4 | Description of the management controls utilized to verify that the procedures for preparation, validation and routine utilization of the information handling system have been followed | Complete | Response in 4/10/83 letter to NRC |
| 2.2.1.5 | Demonstrate that the appropriate design verification and qualification testing is specified for procurement of safety-related components | Ensure engineering procedures ensure that applicable reg- regulatory requirements design bases and quality requirements are met when obtaining material and services | Response in 4/10/83 letter to NRC |
| 2.2.1.6 | Licensees and applicants need only to submit for staff review the equipment classification program for safety-related components | Complete | Response in 4/10/84 letter to NRC |
| 2.2.2 | Vendor Interface Program | Procedures to be implemented prior to startup. | Response in 12/20/85 letter. |

TABLE 1

STATUS OF GENERIC LETTER 83-28
REGULATORY ACTION ITEMS
NINE MILE POINT UNIT 2

| SECTION | TITLE | DECEMBER 1985 SCHEDULE/STATUS | COMMENTS |
|---|---|---|---|
| 3.1 | Post Maintenance Testing (Reactor Trip System Components) | | |
| 3.1.1 | Revise administrative procedures to ensure post-maintenance testing for Reactor Trip Components prior to startup | Review to be completed prior to startup | Response in 12/20/85 letter to NRC |
| | Review Tech Specs to ensure post-maintenance testing for Reactor Trip components prior to startup | Review to be completed prior to startup | Response in 12/20/85 letter to NRC |
| 3.1.2 | Review of SIL's recommendations to ensure appropriate test guidance is included in procedures | Review to be completed prior to startup | Response in 12/20/85 letter to NRC |
| 3.1.3 | Identify any post-maintenance test requirements in technical specifications which can be demonstrated to degrade rather than enhance safety | Review to be completed prior to startup | Response in 12/20/85 letter to NRC |
| 3.2 | Post-Maintenance Testing (all other safety-related components) | | |

TABLE 1

STATUS OF GENERIC LETTER 83-28
REGULATORY ACTION ITEMS
NINE MILE POINT UNIT 2

| SECTION | TITLE | DECEMBER 1985 SCHEDULE/STATUS | COMMENTS |
|---|---|---|---|
| 3.2.1 | Revise administrative procedures to ensure post-maintenance testing for safety-related equipment | Review to be complete prior to startup | Response in 12/20/85 letter to NRC |
| | Review Technical Specifications to ensure post-maintenance testing for safety-related equipment | Review to be complete prior to startup | " |
| 3.2.2 | Review of SIL's to ensure appropriate test guidance is included in procedures. | Review to be complete prior to startup | " |
| 3.2.3 | Identify any post-maintenance test requirements in technical specifications which can be demonstrated to degrade rather than enhance safety | " | " |
| 4.5 | Reactor Trip System Reliability (System Functional Testing) | Complete | Response in 12/20/85 letter to NRC |
| | Functional Testing of scram pilot valves and backup scram valves. | " | " |
| | Evaluate existing intervals for on-line functional testing required by technical specifications | " | " |