



**Idaho
National
Engineering
Laboratory**

*Managed
by the U.S.
Department
of Energy*



*Work performed under
DOE Contract
No. DE-AC07-76ID01570*

EGG-NTA-7622
April 1987

INFORMAL REPORT

CONFORMANCE TO GENERIC LETTER 83-28, ITEM 2.2.2--
VENDOR INTERFACE PROGRAMS FOR ALL OTHER SAFETY-
RELATED COMPONENTS: PALISADES

Alan C. Udy

Prepared for the
U.S. NUCLEAR REGULATORY COMMISSION

8706300691 870501
PDR ADDCK 05000255
P PDR

DISCLAIMER

This book was prepared as an account of work sponsored by an agency of the United States Government. Neither the United States Government nor any agency thereof, nor any of their employees, makes any warranty, express or implied, or assumes any legal liability or responsibility for the accuracy, completeness, or usefulness of any information, apparatus, product or process disclosed, or represents that its use would not infringe privately owned rights. References herein to any specific commercial product, process, or service by trade name, trademark, manufacturer, or otherwise, does not necessarily constitute or imply its endorsement, recommendation, or favoring by the United States Government or any agency thereof. The views and opinions of authors expressed herein do not necessarily state or reflect those of the United States Government or any agency thereof.

TECHNICAL EVALUATION REPORT

CONFORMANCE TO GENERIC LETTER 83-28, ITEM 2.2.2--
VENDOR INTERFACE PROGRAMS FOR ALL OTHER SAFETY-RELATED COMPONENTS:
PALISADES

Docket No. 50-255

Alan C. Udy

Published April 1987

Idaho National Engineering Laboratory
EG&G Idaho, Inc.
Idaho Falls, Idaho 83415

Prepared for the
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Under DOE Contract No. DE-AC07-76ID01570
FIN No. D6001

ABSTRACT

This EG&G Idaho, Inc., report provides a review of the submittals from the Consumers Power Company regarding conformance to Generic Letter 83-28, Item 2.2.2, for the Palisades Plant.

Docket No. 50-255

TAC No. 53699

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.

The U.S. Nuclear Regulatory Commission funded this work under the authorization B&R No. 20-19-10-11-3, FIN No. D6001.

Docket No. 50-255

TAC No. 53699

CONTENTS

ABSTRACT ii

FOREWORD iii

1. INTRODUCTION 1

2. REVIEW CONTENT AND FORMAT 2

3. ITEM 2.2.2 - PROGRAM DESCRIPTION 3

 3.1 Guideline 3

 3.2 Evaluation 3

 3.3 Conclusion 4

4. PROGRAM WHERE VENDOR INTERFACE CANNOT PRACTICABLY BE ESTABLISHED 5

 4.1 Guideline 5

 4.2 Evaluation 5

 4.3 Conclusion 6

5. RESPONSIBILITIES OF LICENSEE/APPLICANT AND VENDORS THAT PROVIDE SERVICE ON SAFETY-RELATED EQUIPMENT 7

 5.1 Guideline 7

 5.2 Evaluation 7

 5.3 Conclusion 7

6. CONCLUSION 8

7. REFERENCES 9

VENDOR INTERFACE PROGRAMS FOR ALL OTHER SAFETY-RELATED COMPONENTS:

PALISADES

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, 1983¹) 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 Consumers Power Company, the licensee for the Palisades Plant, 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 the Palisades Plant responded to these requirements with submittals dated November 7, 1983,² May 31, 1984,³ May 15, 1985⁴ and July 26, 1985.⁵ These submittals include information that describes their past and current 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. Typical

NSSS vendor contact with the licensee includes Combustion Engineering ADP Infobulletins. The licensee also states that a new administrative procedure has requirements for ordering, receipt, proper use and handling of vendor information.

One of the VETIP implementation responsibilities is to seek assistance and equipment technical information from the vendors of safety-related equipment (other than the NSSS vendor) when the licensee's evaluation of an equipment problem or an equipment technical information problem concludes that such interaction is necessary or would be beneficial. The licensee states that they comply with this NUTAC implementation requirement. However, Section 2.2.2 of the generic letter states that formal vendor interfaces should be established with vendors besides the NSSS vendor. The licensee has not indicated that any formal interface program has been established with vendors other than the NSSS vendor.

3.3 Conclusion

We conclude that, with the exception of interaction with the vendors of other safety-related equipment, the licensee's response regarding program description is complete and, therefore, acceptable. The licensee should establish a program to periodically contact vendors of key components (such as auxiliary feedwater pumps, safety-related batteries, ECCS pumps and safety-related valve operators) to facilitate the exchange of current technical information. In the case of the diesel generator and safety-related electrical switchgear vendors, the licensee should establish a formal interface similar to that with the NSSS vendor, if practicable.

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. It should also be noted that the lack 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 stated that plant instructions and procedures are currently in place 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, through Nuclear Network and by NRC reports. Based on the significance of the event, as determined by the screening review, INPO issues a summary report to all utilities outlining the cause of the event and related problems. This report recommends practical corrective actions. These reports are issued as Significant Event Reports, as Significant Operating Experience Reports and as Operations and Maintenance Reminders. Upon receipt of these documents, the licensee evaluates the information to determine applicability to the facility. This evaluation is documented and corrective actions are taken as determined necessary.

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 acceptable. This finding is based on the understanding that the licensee's commitment to implement the VETIP program includes the implementation of the enhancements described in Section 3.2 of the NUTAC/VETIP program to the extent that the licensee can control or influence the implementation of these recommendations.

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 their present and revised programs and procedures adequately implement this program. The VETIP guidelines include implementation procedures for the internal handling of vendor services.

5.3 Conclusion

We find the licensee's commitment to implement the VETIP recommendations acceptable, with the understanding that the licensee's commitment includes the objective for "Internal Handling of Vendor Services" described on page 23 of the March 1984 NUTAC report.

6. CONCLUSION

Based on our review of the licensee's response to the specific requirements of item 2.2.2 for Palisades, we find that the licensee's interface program with its NSSS supplier, its internal handling of vendor-supplied services, along with the licensee's commitment to implement the NUTAC/VETIP program, is acceptable. This is based on the understanding that the licensee's commitment to implement the NUTAC/VETIP program includes the enhancements described in Section 3.2 of the report to the extent that the licensee can control or influence such enhancements.

In addition, the licensee should establish a program to periodically contact vendors of key components (such as auxiliary feedwater pumps, safety-related batteries, ECCS pumps and safety-related valve operators) to facilitate the exchange of current technical information. In the case of the diesel generator and safety-related switchgear vendors, a formal interface, such as that established with the NSSS vendor, should be established, if practicable.

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, Consumers Power Company (D. J. Vandewalle) to NRC (D. G. Eisenhut), "Response to Generic Letter 83-28, Required Actions Based on Generic Implications of Salem ATWS Events," November 7, 1983.
3. Letter, Consumers Power Company (D. J. Vandewalle) to NRC (D. G. Eisenhut), "Response to Generic Letter 83-28, Vendor Interface," May 31, 1984.
4. Letter, Consumers Power Company (B. D. Johnson) to NRC, "Supplemental Response to Generic Letter 83-28 Issue 2.1 and Issue 2.2," May 15, 1985.
5. Letter, Consumers Power Company (J. L. Kuemin) to NRC, "Supplemental Response to Generic Letter 83-28; Issues 2.1, 2.2 (Vendor Interface), 3.1 (Post Maintenance Testing), 3.1.3 and 3.2.3 (Technical Specifications)," July 26, 1985.
6. Vendor Equipment Technical Information Program, Nuclear Utility Task Action Committee on Generic Letter 83-28, Section 2.2.2, March 1984, INPO 84-010.

BIBLIOGRAPHIC DATA SHEET

EGG-NTA-7622

SEE INSTRUCTIONS ON THE REVERSE

2. TITLE AND SUBTITLE

CONFORMANCE TO GENERIC LETTER 83-28, ITEM 2.2.2--
VENDOR INTERFACE PROGRAMS FOR ALL OTHER SAFETY-
RELATED COMPONENTS: PALISADES

3. LEAVE BLANK

4. DATE REPORT COMPLETED

MONTH

YEAR

April

1987

6. DATE REPORT ISSUED

MONTH

YEAR

April

1987

5. AUTHOR(S)

Alan C. Udy

7. PERFORMING ORGANIZATION NAME AND MAILING ADDRESS (Include Zip Code)

EG&G Idaho, Inc.
P. O. Box 1625
Idaho Falls, ID 83415

8. PROJECT/TASK/WORK UNIT NUMBER

9. FIN OR GRANT NUMBER

D6001

10. SPONSORING ORGANIZATION NAME AND MAILING ADDRESS (Include Zip Code)

Division of PWR Licensing - A
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

11a. TYPE OF REPORT

b. PERIOD COVERED (Inclusive dates)

12. SUPPLEMENTARY NOTES

13. ABSTRACT (200 words or less)

This EG&G Idaho, Inc., report provides a review of the submittals from the Consumers Power Company regarding conformance to Generic Letter 83-28, Item 2.2.2, for Palisades.

14. DOCUMENT ANALYSIS • KEYWORDS/DESCRIPTORS

b. IDENTIFIERS/OPEN-ENDED TERMS

15. AVAILABILITY STATEMENT

Unlimited
Distribution

16. SECURITY CLASSIFICATION

(This page)

Unclassified

(This report)

Unclassified

17. NUMBER OF PAGES

18. PRICE