



LONG ISLAND LIGHTING COMPANY

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ANDREW W. WOFFORD
VICE PRESIDENT

SNRC 435

September 27, 1979

Mr. Robert T. Carlson, Chief
Reactor Construction & Engineering Support Branch
U. S. Nuclear Regulatory Commission, Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

NRC Inspection No. 79-07
Shoreham Nuclear Power Station - Unit No. 1
Docket No. 50-322

Dear Mr. Carlson:

This letter responds to your letter of August 21, 1979, which forwarded the report of the inspection of activities authorized by NRC License No. CPPR-95, conducted by Mr. Toth of your office on May 22-25, 1979. The letter stated that it appeared that certain of our activities were not conducted in full compliance with NRC requirements. The apparent noncompliances and our responses follow:

I. Apparent Noncompliance with 10CFR50, Appendix B
Criterion V, and FSAR Paragraph 17.1.5A

Contrary to the above, beam support welds numbered 17 and 17A were accepted by RCI quality control on November 15, 1978 although fitup gaps of 3/16 inch existed in the completed welds. Similar fitup gaps existed in three or more other similar beam supports.

General Comment

All prior fabrication welding on the RPV pedestal, the CRD support beams and the support beam clips was performed to the requirements of the AWS Code. Consistent with this the installation contractor employed welders qualified to ASME Section IX and selected welding practices for installation welding which fulfilled

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Mr. Robert T. Carlson
U. S. Nuclear Regulatory Commission, Region I

September 27, 1979
Page 2

the requirements of AWS D1.1. This AWS Code provides criteria for acceptance which permits gaps between the two members of the base material of up to 3/16 inch. The Code also requires that, when the gap exceeds 1/16 inch, the size of the weld be increased by the approximate amount of gap at the root of the fillet.

Corrective Action and Results

All such beam support welds are being reinspected to assure conformance to AWS D1.1. In the event that any nonconformances are identified by this inspection, corrective action will be accomplished as specified by the Nuclear Steam Supply System supplier.

Steps Taken to Prevent Recurrence

No specific preventive action is required at this time as no further welding of this nature is presently contemplated. Should a requirement develop for such welding, appropriate acceptance criteria relative to fit-up will be published and applied.

Date Full Compliance Will Be Achieved

Full compliance will be achieved by November 1, 1979.

II. Apparent Noncompliance with 10CFR50, Appendix B, Criterion XVI, and FSAR Paragraph 17.1.16B

Contrary to the above, as of May 25, 1979 S&W specification SH1-159 and associated change EDCR-F19039 permit installation of raceway which do not conform to the minimum separation criteria, and permit subsequent installation of cables in the nonconforming raceways. Documentation of each nonconformance is provided by Specification SH1-159, and future disposition of the condition is controlled by the E&DCR control system. However, corrective action to prevent repetition has not been taken and additional nonconforming installations are being made.

General Comment

We take exception to the inspection finding that the conditions identified and reported constitute a nonconformance. Shoreham Specification SH1-159, with the associated E&DCR F-19039, permit such installation in instances where the specified separation by distance criteria cannot be met. Further, Regulatory Guide 1.75, Physical Independence of Electric Systems, also allows for alternative methods of compliance.

1796 030

Mr. Robert T. Carlson
U. S. Nuclear Regulatory Commission, Region I

September 27, 1979
Page 2

The basic separation criteria are not waived or changed, but remain a plant design basis. Therefore, no change to the FSAR is required.

Corrective Action and Results

Each nonconforming condition is described and documented on an E&DCR, and specific analyses are being performed to determine the safety implications in each case. Where the results of these analyses so indicate, any necessary rework will be performed. Final acceptance in each instance will be predicated upon proper disposition of the applicable E&DCR in accordance with approved procedures.

Date Full Compliance Will Be Achieved

Full compliance, including final disposition of all E&DCR's and completion of any necessary rework is not expected until after completion of cable installation at the site.

III. Apparent Noncompliance With 10CFR50, Appendix B, Criterion V, and FSAR Paragraphs 17.1.5A and 3.12.2.2.3

Contrary to the above, on May 24, 1979, installed and inspected RCIC system instrument tubing was separated by less than one foot and was not provided with physical barriers at the connection to pipe spool 1 inch - SLP-9-151-2-1.

Corrective Action and Results

The RCIC system instrument tubing lines have been relocated to conform to the redundant lines separation criteria of Shoreham Specification SH1-343.

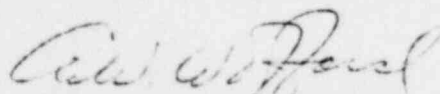
Steps Taken to Prevent Recurrence

Inspection responsibility for separation criteria of SH1-343 has been transferred from the installation contractor to Field Quality Control. Further, a system for color coding of redundant lines has been instituted to make deviations from the four foot separation requirement more readily apparent to the inspector during line walks.

Date Full Compliance Will Be Achieved

Full compliance has been achieved.

Very truly yours,



A. W. Wofford
Vice President

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