LILCO
LONG ISLAND LIGHTING

LONG ISLAND LIGHTING COMPANY

175 EAST OLD COUNTRY ROAD · HICKSVILLE, NEW YORK 11801

MILLARD S. POLLOCK
VICE PRESIDENT-NUCLEAR

SNRC-560

April 27, 1981

Mr. Eldon J. Brunner, Acting Director
Division of Resident and Project Inspection
U.S. Nuclear Regulatory Commission, Region I
631 Park Avenue
King of Prussia, PA 19406

NRC Inspection No. 81-02
Shoreham Nuclear Power Station, Unit No. 1
Docket No. 50-332

Dear Mr. Brunner:

This letter responds to your letter of April 1, 1981 which forwarded the report of the routine inspection of activities authorized by NRC License No. CPPR-95, conducted by Mr. Higgins of your office from February 1 to March 8, 1981. Your letter stated that it appeared that one of our activities was not conducted in full compliance with NRC requirements. The apparent noncompliance of our response follows:

Apparent Noncompliance with 10CFR50, Appendix B, Criterion V, and 10CFR50, Appendix A, Criteria 55-57

Contrary to the above, the requirement that containment isolation valves be located as close to containment as practical was not prescribed by documented instructions, procedures, or drawings for the small bore piping containment isolation valves. As a result, the following outside containment isolation valves were not located as close to containment as practical:

Valves 1C11*01V-1028 A and B were installed 10 to 15 feet from the containment penetration; and,

Valves 1P50*MOV-103 A and B were installed approximately 40 feet from the containment penetration.

Comment

We do not consider that the valve installation conditions described above are nonconforming. We have completed a field inspection and engineering evaluation of the location of the CIVs outside containment for the CRD to recirculation pump purge lines (1C11*01V-1028 A and B) and for the instrument air lines (1P50*MOV-103 A and B). The results of this investigation have led to the conclusion that the intent of General Design

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Criteria 55-57, requiring CIVs to be located "as close as practical" to containment, and Criterion V, requiring activities affecting quality to be prescribed by documented instructions, procedures or drawings, have been fulfilled at Shoreham. Approved fabrication and installation drawings were utilized and site quality control verification applied in each case.

The two 3/4 inch CIVs for the CRD to recirculation pump purge lines are installed in accordance with approved engineering drawings 42.11-001C and 2C. Site quality control organizations utilize these documents to verify that "as installed" locations agree with the engineered locations. These drawings show the CIVs located 10 to 15 feet from the containment penetration as noted by your inspector. We have reevaluated these locations with our engineers and have found them to be located as close as practical to the containment penetrations in light of other important considerations such as maintainability, seismic support design and accessibility for inservice inspection and testing.

The two 1 1/2 inch CIVs for the instrument air line (1P50*MOV-103A and B) are installed in accordance with approved engineering isometric drawings K01CP-1 and K01BW-1. These drawings are used by site quality control organizations to verify that engineered locations have been maintained in the "as installed" condition.

As the inspector has noted, 1P50*MOV-103A is located approximately 40 feet from the containment penetration. Approval to relocate this valve from its original location 28 feet from the penetration was granted on E&DCR F-27713. 1P50*MOV-103A is a large valve relative to the run pipe and, as a result, the design of the seismic support system and proximity to a maintenance, inspection, and testing platform dictated that this location be accepted. 1P50*MOV-103B is located approximately 28 feet from the containment penetration. Again, this location was chosen based on maintenance, inservice inspection and testing accessibility and the ability to provide adequate seismic support for the valve and associated piping.

To summarize, our evaluation of this matter indicates that the Criteria of 10CFR50 have been adequately fulfilled. Activities affecting quality are prescribed by the above referenced drawings and are verified by quality assurance organizations. When all factors governing the design location of the CIVs in question are evaluated, it can be shown that they are located as close as practical to the containment penetrations.

In view of the above, no corrective or preventive action is considered necessary.

Very truly yours,

Millard S. Pollock

Millard S. Pollock
Vice President-Nuclear

A F F I D A V I T

STATE OF NEW YORK)
: ss.:
COUNTY OF NASSAU)

MILLARD S. POLLOCK, being duly sworn, deposes and says that I am a Vice President of Long Island Lighting Company, the owner of the facility described in the caption above. I have read the Notice of Violation dated April 1, 1981 and also the response thereto prepared under my direction dated April 27, 1981. The facts set forth in said response are based upon reports and information provided to me by the employees, agents, and representatives of Long Island Lighting Company responsible for the activities described in said Notice of Violation and in said response. I believe the facts set forth in said response are true.

Millard S. Pollock
MILLARD S. POLLOCK

Sworn to before me this
27th day of April, 1981.

Rosa Lee Oliveros

ROSA LEE OLIVEROS
Notary Public, State of New York
No. 30-4709203
Qualified in Nassau County
Commission expires Mar. 30, 1982