



LONG ISLAND LIGHTING COMPANY

SHOREHAM NUCLEAR POWER STATION

P.O. BOX 618, NORTH COUNTRY ROAD • WADING RIVER, N.Y. 11792

WILLIAM E. STEIGER, JR.

ASSISTANT VICE PRESIDENT—NUCLEAR OPERATIONS

SNRC-1671

JAN 30 1990

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Response to Generic Letter 89-10
Shoreham Nuclear Power Station - Unit 1
Docket No. 50-322

- Ref: (1) Generic Letter 89-10, "Safety-Related Motor-Operated Valve Testing and Surveillance - 10CFR50.54(f)", June 28, 1989.
- (2) LILCO letter SNRC-1621 dated September 27, 1989 to U.S. Nuclear Regulatory Commission from W.E. Steiger, Jr.; subject: Deferral of Certain Regulatory Activities.
- (3) LILCO letter SNRC-1664 dated January 5, 1990 to U.S. Nuclear Regulatory Commission from W.E. Steiger, Jr.; subject: License Change Application Operating License NPF-82.
- (4) LILCO (A.F. Earley, Jr.) letter dated September 19, 1989 to U.S. NRC (T. Murley); subject: LILCO's Response to the August 28, 1989 letter from NRC to LILCO.

Gentlemen:

The Long Island Lighting Company (LILCO) has reviewed Generic Letter 89-10 (reference 1) as it relates to the Shoreham Nuclear Power Station (SNPS). Commensurate with SNPS' current non-operating and defueled condition, and consistent with the information previously submitted to the Commission by SNRC-1621 (reference 2), LILCO has determined that the requirements and recommended actions of Generic Letter 89-10 as they pertain to SNPS will be indefinitely deferred. The deferred status of this Generic Letter request will be tracked on LILCO's computerized administrative tracking system.

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Generic Letter 89-10 imposes specific requirements upon licensees in order to ensure that all safety-related motor-operated valves (MOV's) will operate as required under design basis conditions. In Shoreham's current non-operating, defueled condition, i.e., with the reactor vessel defueled and the low activity fuel stored in the Spent Fuel Storage Pool, the safety significance of timely remote actuation of plant MOV's is substantially reduced. As described in SNPS "Defueled Safety Analysis Report" (Attachment 3 to reference 3), many of the design basis accident scenarios are no longer considered credible events (e.g., loss of coolant accident, loss of feedwater, closure of main steam isolation valves, etc.).

In the current defueled condition, most MOV's at SNPS are located in plant systems currently designated non-operational (i.e. FUNCTIONAL or PROTECTED; see reference 4). As a result of Technical Specifications or operational requirements, approximately 40% of the safety-related MOV's are maintained OPERABLE in eight systems. These systems are Reactor Building Service Water (RBSWS), Reactor Building Standby Ventilation (RBSVS)/CRAC Chilled Water, Reactor Water Clean-up (RWCUS), Reactor Building Standby Ventilation (RBSVS), Miscellaneous HVAC, Diesel Generator Ventilation, Control Room Air Conditioning and Radwaste. With SNPS in its current defueled state, the original design basis capability of several of these systems far exceeds present requirements and failures of MOV's in these systems would not present safety significant concerns (see Attachment 3 of Reference 3). For example, the RBSWS, RBSVS/CRAC Chilled Water and RBSVS are designed to remove heat loads associated with full power operation. In the present plant condition, heat loads are substantially reduced. This allows for increased flexibility to accommodate present heat removal requirements. Moreover, some MOV's will no longer be exposed to the high differential pressures associated with full power operation. MOV's such as containment isolation valves and valves in the Reactor Water Cleanup system fall into this category. Indeed, in Shoreham's current defueled condition, most of the original design basis criteria do not apply and would be inappropriately used in this context.

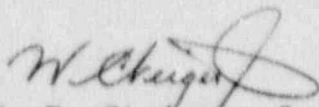
With the plant in a defueled state, LILCO recognizes the importance of maintaining water level in the Spent Fuel Storage Pool. However, because of the low decay heat level associated with the spent fuel, a very small makeup flow rate is required. This allows for an extended period of time (several days) in which compensatory actions can be taken to restore pool level if water level dropped below technical specification limits and the primary makeup capability is unavailable. This extended time interval in conjunction with negligible radiation levels in the Reactor Building will permit repair or local operation of most MOV's, or performance of other actions necessary to restore pool level. Loss of remote manual or automatic valve operation is therefore not considered safety significant.

Finally, in accordance with item 1 (Reporting Requirements) of Generic Letter 89-10, LILCO is hereby informing the Commission of its intent to indefinitely defer implementation of the Generic Letter's recommendations and requirements for SNPS. The technical justification for deferral is based on the plant's current defueled status, and the resulting absence of any design basis event requiring timely remote MOV actuation, as noted above.

LILCO assures the Commission that the deferred action will be tracked and, should the present SNPS situation change, the requirements and recommended actions of Generic Letter 89-10 will be addressed.

If additional information or further discussion is required, please do not hesitate to contact my office.

Very truly yours,



W. E. Steiger, Jr.
Assistant Vice President
Nuclear Operations

MP/ap

cc: S. Brown
W. T. Russell
F. Crescenzo

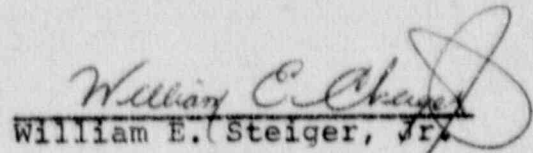
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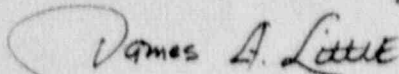
: SS:

COUNTY OF SUFFOLK)

I, WILLIAM E. STEIGER, JR., being duly sworn, depose and say that I am the Assistant Vice President - Nuclear Operations for the Long Island Lighting Company. I am authorized on the part of said Company to sign and file with the U.S. Nuclear Regulatory Commission the enclosed letter (SNRC-1671) for the Shoreham Nuclear Power Station. This response was prepared under my supervision and direction; and the statements contained therein are true and correct to the best of my knowledge, information and belief.


William E. Steiger, Jr.

Sworn to before me this
30th day of January 1990



JAMES A. LITTLE
NOTARY PUBLIC, State of New York
No. 4886267, Suffolk County
Term Expires May 18, 1991