

August 30, 1982

In the Matter of  
Long Island Lighting Company  
(Shoreham Nuclear Power Station, Unit 1)  
Docket No. 50-322 (OL)

NOTE TO ATTACHED SERVICE LIST

Enclosed is a copy of a letter from NRC Region I to Applicant dated August 9, 1982. The subject of the letter is Applicant's June 25, 1982 response to Inspection Report No. 50-322/82-08.

Sincerely,

Bernard M. Bordenick  
Counsel for NRC Staff

Enclosure:  
As Stated

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U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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Appeal Board Panel\*  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

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COURTESY COPY LIST

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AUG 9 1982

Long Island Lighting Company  
ATTN: Mr. M. S. Pollock  
Vice President - Nuclear  
175 East Old Country Road  
Hicksville, New York 11801

Gentlemen:

Subject: Inspection 50-322/82-08

This refers to your letter dated June 25, 1982, in response to our letter dated May 27, 1982.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

We have reviewed the information provided in your letter dated June 25, 1982, regarding the classification of Item A.2 as a Violation. It is our position that integrated systems tests, such as the Reactor Pressure Boundary Leak Test require review and approval in accordance with commitments described in FSAR, Section 14.1 and the Startup Manual, Section 4.2. Based on our review, Item A.2 remains a Violation.

Based on discussions between Mr. E. Youngling of your staff and Mr. J. Higgins of our staff on July 27, 1982, we understand the following. Individual system tests will be performed using the appropriate type of test procedure such as preoperational test procedure, an acceptance test procedure or a Checkout and Initial Operations Test procedure. Individual system operation will be accomplished utilizing the Startup Interim Operating Instructions (IOIs) or the permanent Station Procedures. Additionally, significant integrated systems tests will be controlled using one of the above procedure types. The Joint Test Group will review planned integrated systems tests to determine if they are significant and as such require additional procedural coverage.

Your cooperation with us in this matter is appreciated.

Sincerely,

*Richard W. Starostecki*  
Original Signed By: *[Signature]*  
Richard W. Starostecki, Director  
Division of Project and Resident  
Programs

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OFFICE ▶							
SURNAME ▶							
DATE ▶							

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cc:

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Jeffrey L. Futter, Esq.  
T. F. Gerecke, Manager, QA Department  
J. Rivello, Plant Manager  
Public Document Room (PDR)  
Local Public Document Room (LPDR)  
Nuclear Safety Information Center (NSIC)  
NRC Resident Inspector  
State of New York

bcc:

Region I Docket Room (with concurrences)  
R. Gilbert, DOL, NRR  
G. Rhoads, SRI



# LONG ISLAND LIGHTING COMPANY

175 EAST OLD COUNTRY ROAD · HICKSVILLE, NEW YORK 11801

MILLARD S. POLLOCK  
VICE PRESIDENT - NUCLEAR

SNRC-720

June 25, 1982

Mr. Richard W. Starostecki, 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. 82-08  
Shoreham Nuclear Power Station, Unit No. 1  
Docket No. 50-322

Dear Mr. Starostecki:

This letter responds to your letter of May 27, 1982, which forwarded the report of the routine inspection of activities authorized by NRC License No. CPPR-95, conducted by Mr. Higgins of your office on March 30-May 10, 1982. Your letter stated that it appeared that one of our activities was not conducted in full compliance with the NRC requirements. The apparent noncompliance and our response follow.

Apparent Noncompliance with 10CFR50, Appendix B, Criterion VI, and FSAR Sections 17.1.6A, 17.1.6D and 17.2.6

1. The LILCO Startup Manual, section 1.3, states that the Startup Manual is a controlled document. The LILCO Startup Manual, section 4.17.3 and 4.17.4, states that Startup Instructions are approved by the Lead Startup Engineer and included in Appendix 4A of the Startup Manual.

Contrary to the above, on April 27, 1982, Rev. 2 to Startup Instruction No. 2, dated April 8, 1982, which was not approved by the Lead Startup Engineer, was inserted in the Resource Center Startup Manual (Controlled Copy No. 36-1) and the approved Rev. 1 to Startup Instruction No. 2 was removed. Rev. 1 was still contained in Control Room and Quality Assurance Startup Manuals (Controlled Copies No. 22 and 43).

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Corrective Action and Results

Startup Instruction No. 2, Revision 2, was approved by the Lead Startup Engineer, Electrical, and issued on April 29, 1982. Distribution of this revision to all controlled copies of the LILCO Startup Manual on site was completed on April 30, 1982.

Steps Taken to Prevent Recurrence

A copy of the revised Startup Instruction was placed in the Project Resource Center copy of the LILCO Startup Manual by the Project Resource Center Test Engineer prior to its being approved by the Lead Startup Engineer. It was verified that this condition did not exist in any other copies of the Manual. To prevent recurrence, responsibility for incorporating revisions into all controlled copies of the Startup Manual has been assigned to the Administrative Aide to the Startup Manager.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

2. The Shoreham FSAR, section 14.1, and the LILCO Startup Manual, section 4.2, describe the organization and system used for preparation, review, approval and execution of all test procedures for the preoperational phase.

Contrary to the above, on April 26, 1982, during the pre-operational phase, the Inservice Reactor Pressure Boundary Leak Test was performed using a procedure not reviewed and approved per the above system.

General Comment

LILCO does not concur with the classification of this finding as a Violation. The Inservice Reactor Pressure Boundary Leak Test being conducted on April 26, 1982, was not a required test, but an informational test performed in accordance with good engineering practice to assure LILCO that construction and installation of the system was satisfactory to date.

In accordance with Startup Manual Section 5.3.8, 7.3 and Startup Instruction No. 1 "Preparation of Interim Operating Instructions" the approved station procedure SP22.009.01 (Rev. 0) "Inservice Reactor Pressure Boundary Leak Test"



Mr. Richard W. Starostecki  
June 25, 1982  
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had been marked up by a Test Engineer to fit the existing plant conditions for this activity. This instruction was reviewed and approved by the Lead Startup Engineer - NSSS and the Assistant Startup Manager. The review and approval by the Assistant Startup Manager was one level of management higher than required by Startup Instruction No. 1. However, the marked up instruction was issued without the correct transmittal form and modification to the instruction number to indicate a Startup Station Procedure or SSP. The technical content of the procedure was correct.

The formal Operational Hydrottest will be performed subsequent to fuel load in accordance with Shoreham Technical Specification, Section 4.0.5.

Nevertheless the following corrective steps have been taken to prevent recurrence.

Steps Taken to Prevent Recurrence

The use of the proper Interim Operating Instruction transmittal and numbering designations were reviewed with the Lead Startup Engineer - NSSS and the Assistant Startup Manager. Future Interim Operating Instructions will be transmitted and numbered properly. No further action is required as there was no technical impact on the procedure used.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

Very truly yours,

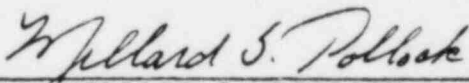
*M. S. Pollock*

M. S. Pollock  
Vice President-Nuclear

cc: Mr. J. Higgins  
All Parties

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 May 27, 1982, and also the response thereto prepared under my direction dated June 25, 1982. 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

Sworn to before me this  
25<sup>th</sup> day of June, 1982.

Rosa Lee Oliveros

ROSA LEE OLIVEROS  
Notary Public, State of New York  
No. 30-4708263  
Qualified in Nassau County  
Commission expires Mar. 30, 1984