

September 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 dated September 16, 1982 from NRC Region I to Long Island Lighting Company (LILCO) regarding Inspection 50-322/82-13. A copy of LILCO's August 12, 1982 letter referenced in the Region I letter is also enclosed.

Sincerely,

Bernard M. Bordenick
Counsel for NRC Staff

Enclosure:
As Stated

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DATE	:09/30/82	:	:09/30/82	:	:	:	:	:

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
LONG ISLAND LIGHTING COMPANY)
)
(Shoreham Nuclear Power Station,)
Unit 1))

Docket No. 50-322
(OL)

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SEP 16 1982

Docket No. 50-322

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

Gentlemen:

Subject: Inspection 50-322/82-13

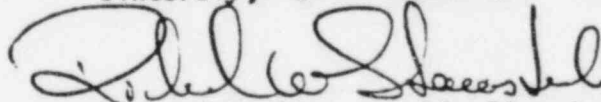
This refers to your letter dated August 12, 1982, in response to our letter dated July 14, 1982. Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

We have reviewed the information provided in your letter for Item A of Appendix A. Region I does not concur with your evaluation of this item, but intends to forward it to our Office of Nuclear Reactor Regulation for review.

Our review of the deviation in Appendix B, along with the information that you provided, has confirmed the validity of the deviation. It stands as written. Based on discussions on August 31, 1982 between Mr. J. Higgins of our office and Mr. J. Smith of your staff, we understand that you will amend the FSAR to include the subject information.

Your cooperation with us in these matters is appreciated.

Sincerely Original Signed By:



Richard W. Starostecki, Director
Division of Project and Resident
Programs

cc:

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Director, Power Division
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State of New York
Shoreham Hearing Service List

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Long Island Lighting Company

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SEP 16 1982

bcc:
Region I Docket Room (with concurrences)
L. Narrow, Region I



LONG ISLAND LIGHTING COMPANY

175 EAST OLD COUNTRY ROAD · HICKSVILLE, NEW YORK 11801

MILLARD S. POLLOCK
VICE PRESIDENT - NUCLEAR

SNRC-750

August 12, 1982

Mr. Richard W. Starostecki, Director
Division of Project and Resident Programs
U. S. Nuclear Regulatory Commission, Region I
631 Park Avenue
King of Prussia, PA 19406

NRC Inspection No. 82-13
Shoreham Nuclear Power Station, Unit No. 1
Docket No. 50-322

Dear Mr. Starostecki:

This letter responds to your letter of July 14, 1982, which forwarded the report of the routine inspection of activities authorized by NRC License No. CPPR-95 conducted by Mr. Higgins and others of your office on May 11-June 18, 1982. Your letter stated that it appeared that several of our activities were not conducted in full compliance with the NRC requirements, and that one other activity appeared to be in deviation from FSAR commitments.

The apparent noncompliances and our responses follow:

Apparent Noncompliance with 10CFR50 Appendix B
Criterion III, 10CFR50.55a(h),
and FSAR Paragraph 7.3.2.1.4.19

10CFR50, Appendix B, Criterion III requires that measures be established to assure that regulatory requirements as specified in the license application are correctly translated into specifications, procedures and instructions.

10CFR50.55a(h) states that protection systems shall meet the requirements of Institute of Electrical and Electronics Engineers Standard 279 (IEEE-279). Paragraph 4.19 of IEEE-279 requires that protective actions be indicated and identified down to the channel level.

Shoreham Final Safety Analysis Report (FSAR) paragraph 7.3.2.1.4.19 discusses the implementation of paragraph 4.19 of IEEE-279 and states that each sensor relay for the Low Pressure Coolant Injection (LPCI) system actuates an annunciator and an indicator light.

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Mr. Richard W. Starostecki, Director

August 12, 1982

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Contrary to the above, regulatory requirements were not correctly translated into specifications, procedures and instructions in that the protective action relay for the low reactor pressure (410 psig), LPCI injection valve, opening permissive is not annunciated and has no indicator light.

LILCO Position

LILCO does not agree that the finding described above constitutes a violation. The reason is that the low reactor pressure relay is not subject to the annunciator and indicator light requirements defined in IEEE-279 paragraph 4.19. Specifically, FSAR paragraphs 7.3.2.1.3.19 and 7.3.2.1.4.19 deal with SENSOR relays. Sensor relays are defined as incident detection relays, i.e., for reactor vessel low water level and high drywell pressure. Since the low reactor pressure signal referred to in this report is used as a permissive interlock and not for incident detection, it is not required to be directly indicated either by annunciation or illumination. This method of control function indication is consistent with that used elsewhere at Shoreham. Further, this aspect was similarly addressed to the Resident Inspector via a Licensing response, dated July 7, 1982, pertaining to NRC Item No. 81-12-04, dated August 6, 1981.

Apparent Noncompliance with 10CFR50 Appendix B
Criterion XI and 1) Startup Manual, 2) Procedure CG.000.007-5,
and 3) FSAR Paragraph 14.1

10CFR50, Appendix B, Criterion XI requires that a test program be established to assure that all testing is performed in accordance with written test procedures and that test results are documented.

1. Startup Manual paragraph 7.6.1 states that all C&IO testing shall be documented.

Contrary to this requirement, as of May 13, 1982, there was no documentation available for the C&IO testing of Residual Heat Removal System relays Ell*K45A and B.

Corrective Action and Results

A new C&IO package was initiated and issued on May 27, 1982, for the retest of relays Ell*K45A and Ell*K45B. The retesting has been completed and the C&IO package is in the process of being filed in the Project Resource Center.

Actions to Prevent Recurrence

The Test Engineers involved have been instructed to insure the completeness of their C&IO files in the Project Resource Center prior to the "release for performance" of their pre-operational tests.

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Date of Full Compliance

The C&IO package will be filed in the Project Resource Center by August 23, 1982.

2. Procedure CG.000.007-5, "Low Voltage Control Circuits" paragraph 1.2 states that continuity checks are done to verify that circuits are wired in accordance with the latest wiring diagram. Paragraph 7.5 requires that the diagram be yellow lined to indicate that the checks are completed.

Contrary to this requirement, continuity checks and yellow lining did not verify that circuits were wired in accordance with the latest wiring diagram in that the arrangement yellow lined on Elementary Diagram 1.61-1361, Yellow Line Master dated April 5, 1982, was not the arrangement actually installed.

Corrective Actions and Results

E&DCR-P-36309B was issued to change drawing 1.61-1361 to indicate a separate timer-relay configuration as opposed to the normal integrated time-delay relay configuration. A C&IO package was initiated and issued to retest (yellow-line) the circuit in accordance with E&DCR-P-36309B. This retest has been completed and the C&IO package is in the process of being filed in the Project Resource Center.

Actions to Prevent Recurrence

The approved standard representation for time-delay relays was shown on drawing 1.61-1361. The Test Engineer's circuit testing had included the actual installed circuit but was documented in the manner drawing 1.61-1361 provided. Any future drawing discrepancies found through testing will be brought to the attention of engineering for resolution.

Date of Full Compliance

The C&IO package will be filed in the Project Resource Center by August 23, 1982.

3. FSAR paragraph 14.1 states that the initial test program assures that operating procedures have been evaluated. Startup Distribution memorandum, dated April 8, 1981, titled "Review of Alarm Response Procedures", states that when annunciator windows are blue dotted an ARP must be issued to the control room and that missing values are to be entered. Startup Instruction No. 1, Rev. 5 and 6, paragraph 5 further requires that station alarm response procedures (ARPs) be reviewed and updated with "Later" items filled in and trip and reset values specified. Startup Manual paragraph 8.6.1 states that the system turnover packages from the Startup Group to the Plant

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Mr. Richard W. Starostecki, Director

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Staff will include marked up, reviewed copies of station procedures.

Contrary to the above requirements as of June 17, 1982 ARPs, whose annunciator windows were blue dotted, did not have all missing values entered with all "Later" items filled in and trip and reset values specified, for example: ARP Nos. 206, 355, 1060, 1076, 1126, 1310, 1322, and 3122. Additionally, the system turnover packages from the Startup Group to the Plant Staff did not include marked up, reviewed copies of ARPs Nos. 171, 260, 261, 286-2, 3030 and 3068, and the effective control room copies of these ARPs either had not been reviewed and updated by Startup or had "Later" items not filled in or had trip or reset values not specified.

Corrective Actions and Results

All Startup personnel have been reminded to review and update ARPs in accordance with Startup Instruction #1. Additionally, the Tagging Coordinator has performed reviews of the IOI - ARP book and he will continue these reviews on a bi-weekly basis to insure all "Later" and missing values are corrected.

The procedure for turnover package transmittal to Plant Staff has been revised and now specifically requires that review and comment of ARPs be included. The Plant Staff also reviews and updates ARPs at the time of their acceptance of the system.

Actions to Prevent Recurrence

The Assistant Startup Manager now reviews and initials ARPs issued under the IOI program to insure all "Later" and missing values have been addressed.

As stated above, ARP review and comment is a requirement of the Turnover to Plant Staff package, and the Startup Manager insures this upon his approval of Turnover to Plant Staff packages.

Date of Full Compliance

Full compliance with Interim Operating Instruction issued ARPs will be achieved by August 30, 1982.

Full compliance with review and comment of ARPs to Plant Staff will occur as system turnovers take place.

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Apparent Noncompliance with 10CFR50 Appendix B
Criterion V, FSAR Paragraph 17.2.5, and
the LILCO Quality Assurance Manual

10CFR50, Appendix B, Criterion V, Shoreham FSAR paragraph 17.2.5, and the LILCO Operational Quality Assurance Manual Section 5.3.1 all require that activities affecting quality be accomplished in accordance with documented instructions and procedures. Startup Manual, paragraph 4.4.2 states that, if leads are lifted or jumpers installed, then the lead or jumper must be tagged with a "Wire Lifted/Temporary Jumper Tag".

Contrary to this requirement on May 13 and 14, 1982, the following leads were lifted or jumpers installed with no tags:

Panel 601 - TB CC unnumbered lead lifted by fuse block
TB HH lead CC75 lifted

Panel MXP - TB 17 points 73 and 74 were jumpered and had a lead lifted
TB 5 points 57 and 58 were jumpered and had a lead lifted

Panel 617 - Relay K94A had a jumper between points CR 13 and CF 13

Remote Shutdown Panel - Jumper arrangement installed on C61-TE-103.

Corrective Actions and Results

Lifted leads and jumpers noted by the Inspector have been identified in accordance with the LILCO Startup Manual, paragraph 4.4.2.

The responsible Test Engineers have been reinstructed in the proper application of Startup Manual, paragraph 4.4.2. In addition, the main control room panels, the remote shutdown panel, and Cat. I panels in the relay room (Control Building El. 44') were surveyed by Startup personnel to assure that temporary jumpers and lifted leads are tagged unless they are spares. Deficiencies found were corrected.

Actions to Prevent Recurrence

To assure compliance on a continuing basis, the above-mentioned panels will be resurveyed once a week by Startup personnel to insure Startup Manual, paragraph 4.4.2 is being followed. If deficiencies are found, they will be red tagged (for tracking purposes) and corrective action including reterminating (for lifted leads), determinating (for temporary jumpers) or "permanent" tagging will take place as soon as practical.

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Date of Full Compliance

All deficiencies noted by the Inspector have been corrected. The survey program, stated above, is underway.

Apparent Noncompliance with FSAR
Paragraph 7.3.1.1.4.1.b.ii

The Shoreham FSAR, paragraph 7.3.1.1.4.1.b.ii states that the recirculation pump discharge valves close automatically on receipt of a Low Pressure Coolant Injection (LPCI) initiation signal.

Contrary to the above, the recirculation pump discharge valves actually require both a LPCI initiation and a confirmatory low reactor pressure (310 psig) signal, not described in the FSAR, in order to close automatically.

LILCO Position

LILCO disagrees that this item is a deviation from the FSAR. The low reactor pressure permissive is shown on G.E. elementary drawings 791E418TF sheets 6 and 9 and on S&W elementary drawings. These drawings and other safety-related schematics and diagrams were submitted as part of the FSAR application to the NRC for review as early as February 1976 (LILCO letter SNRC-82).

As stated in the first response, the low pressure signal is a permissive and need not be addressed in FSAR paragraph 7.3.1.1.4.1.b.ii.

Corrective Action and Results

Since this condition is not a deviation from FSAR commitments, no corrective action is necessary.

Very truly yours,

M. S. Pollock

M. S. Pollock
Vice President-Nuclear

cc: Mr. J. Higgins
All Parties

