



LONG ISLAND LIGHTING COMPANY

175 EAST OLD COUNTRY ROAD · HICKSVILLE, NEW YORK 11801

MILLARD S. POLLOCK
VICE PRESIDENT-NUCLEAR

SNRC-724

July 1, 1982

Mr. Thomas T. Martin, Director
Division of Engineering and Technical Programs
U.S. Nuclear Regulatory Commission, Region I
631 Park Avenue
King of Prussia, PA 19406

NRC Inspection No. 82-10
Shoreham Nuclear Power Station, Unit No. 1
Docket No. 50-322

Dear Mr. Martin:

This letter responds to your letter of May 24, 1982, which forwarded the report of the routine inspection of activities authorized by NRC License No. CPPR-95, conducted by Mr. Pullani of your office on April 26-29, 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 follows:

Apparent Noncompliance with 10CFR50, Appendix B, Criterion XII, and the LILCO Startup Manual, Section 4.4.3

Contrary to the above, on April 28, 1982, Flow Measuring and Test Equipment Panel 42-4, used for the Local Leak Rate Testing of Primary Containment Isolation Valve MOV-03iC, was not properly calibrated, in that:

1. Original records of calibration either by the licensee, the manufacturer, or an approved testing laboratory were not available at the site as of the date of the test.
2. Instead of the required calibration, an "accuracy check" was performed periodically using a procedure which was not approved as of the date of the test.

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3. PT. 654.003, Revision 1, Primary Containment Leak Rate Test - Type C, the procedure used for the testing of MOV-031C, requires in Steps 3.3 and 8.6 that certain corrections be applied to the test results if the temperature or pressure of air used for the test differs from the temperature or pressure of air used for the calibration. The "accuracy check" had no provisions for recording the calibration temperature.

It was further determined that all other Flow Measuring and Test Equipment Panels used for Local Leak Rate Tests performed prior to April 28, 1982, were not properly calibrated.

LILCO Position

LILCO does not concur with the classification of Severity Level V Violation that was assigned to this finding. LILCO maintains that proper calibration of the local leak rate test (LLRT) Flow Measuring and Test Equipment (hereafter referred to as LLRT rotometer) had been performed as specified for this type of equipment. This equipment is not classified QA Category I and also is not part of the Shoreham Measuring and Test Equipment (M&TE) program as assumed in the Notice of Violation of the Inspection No. 50-322/82-10 report.

The apparent violation is described in the report in three parts so the LILCO explanations and actions are presented below in the same order:

1. Calibration Records

Explanation

The LLRT rotometers are specific to the Primary Containment Integrated Leak Rate Test System. Therefore, a process called calibration verification had been performed per Startup Manual Section 7.6.4, Test Performance, and CG.000.004, Instrument or Control Component Checkout and Calibration, instead of per Startup Manual Section 4.4.3, Measuring and Test Equipment, and Station Procedure 41.003.01, Control of I&C Measuring and Test Equipment.

CG.000.004 Section 7.3.3 states for nonsafety-related equipment "when specific procedures or a vendor manual are not available for basic instruments ... the Test Engineer may direct the Control Technician to perform the checkout/calibration in accordance with standard calibration methods

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and good work practices". Written direction was provided by the Test Engineer, as required above, for the calibration verification of the LLRT rotometers using approved data sheets per CG.000.004. Records of the Local Leak Rate Test (LLRT) rotometer calibration verifications have been on file with the Test Engineer. These calibration records will become part of the LLRT results data in PT.654.002 Primary Containment Leak Rate Test Type B and PT.654.003 Primary Containment Leak Rate Test Type C.

Current Action and Results

It is LILCO's intention to insure calibration via our own calibration program using standards and methods traceable to the National Bureau of Standards (NBS), or the use of an offsite calibration facility. Currently, LLRT rotometers are being calibrated by an offsite calibration facility with standards traceable to NBS.

Steps Taken to Prevent Recurrence

See "Steps Taken" paragraph for item 3 regarding Station Procedure 46.050.44.

2. "Accuracy Check"

Explanation

The "accuracy check" referred to was in fact the calibration verification described above. CG.000.004 permits the Test Engineer to provide necessary instructions and, in this case, written direction was available.

Current Action and Results

Currently, LLRT rotometers are being calibrated by an offsite calibration facility to standards traceable to NBS.

Steps Taken to Prevent Recurrence

See "Steps Taken" paragraph for item 3 regarding Station Procedure 46.050.44.

3. Calibration Temperature

Explanation

LILCO agrees that during this test there were no provisions

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for measuring calibration facility air supply temperature. However, a check was performed with results as indicated below:

Current Action and Results

The onsite calibration facility instrument air supply temperature was verified to be no higher than 73°F. A conservative value of 75°F was therefore used in the temperature correction of the indicated leak rates. This conservative correction was applied to all valves that were tested with LLRT rotometers for which temperatures were not recorded during calibration verification. The results of this correction have proved to be less than 0.5% of the indicated results. If applied to the total maximum allowable leak rate, the error would be less than 1 SCFH.

Currently, LLRT rotometers are being calibrated by an off-site facility to standards traceable to the NBS and with temperature data being recorded for each recalibration.

Steps Taken to Prevent Recurrence

Shoreham Station Procedure 46.050.44, Leak Rate Test Panel Rotometer Calibration, has been drafted and will be approved by the Review of Operations Committee by July 1, 1982. This procedure is written to insure continuity between the Startup preoperational test program and the Plant Staff surveillance program and requires recording calibration temperature during each LLRT rotometer calibration verification. All future LLRT indicated leak rates will be corrected for the rotometer calibration air temperatures. This does not invalidate leak rate testing or rotometer calibration performed under CG.000.004.

Date Action will be Completed

Station Procedure will be in effect by July 1, 1982.

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 24, 1982, and also the response thereto prepared under my direction dated July 1, 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
MILLARD S. POLLOCK

Sown to before me this
1st day of *July*, 1982.

Rosa Lee Oliveros

ROSA LEE OLIVEROS
Notary Public, State of New York
No. 01-4700268
Qualified in Nassau County
Commission expires Mar. 30, 19*84*