



LONG ISLAND LIGHTING COMPANY

175 EAST OLD COUNTRY ROAD · HICKSVILLE, NEW YORK 11801

MILLARD S. POLLOCK
VICE PRESIDENT - NUCLEAR

SNRC-730

July 19, 1982

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

NRC Inspection No. 82-11
Shoreham Nuclear Power Station, Unit No. 1
Docket No. 50-322

Dear Mr. Martin:

This letter responds to your letter of June 18, 1982, which forwarded the report of the routine inspection of activities authorized by NRC License No. CPPR-95, conducted by Mr. H. Nicholas of your office on May 11-14, 17-20, 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 XI, 10CFR50 Appendix A
Criterion 18, and SNPS FSAR Section 8.3.2.1

10CFR50, Appendix B, Criterion XI, requires a test program with written test procedures to demonstrate that systems and components will perform satisfactorily in service, incorporating the requirements and acceptance limits contained in applicable documents.

10CFR50, Appendix A, Criterion 18, requires that electrical power systems important to safety shall be designed to be tested periodically for operability and functional performance. SNPS FSAR Section 8.3.2.1 states that a battery performance test will be performed every five years and that a battery service test will be performed every eighteen months.

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Contrary to the above, as of May 20, 1982, service testing had not been performed on three batteries due to be tested by August 1981, August 1981 and March 1982, respectively.

LILCO Position

LILCO does not agree that the finding cited above violates the requirements of: 1) 10CFR50, Appendix B, Criterion XI; 2) 10CFR50, Appendix A, Criterion 18; and 3) SNPS FSAR Section 8.3.2.1. The reasons for this position are as follows:

- 1) LILCO conducted the initial performance and service tests in 1980, as stated in the report, using approved written test procedures. During the subsequent preoperational testing phase, LILCO has provided for periodic maintenance and testing (such as greasing of terminals, checking for corrosion, testing specific gravity, etc.) specifically to prevent deterioration of the batteries or to detect deterioration should it occur. Written and approved Interim Operating Instructions are used for this function. Therefore, LILCO has satisfied the conditions of 10CFR50, Appendix B, Criterion XI.
- 2) The cited batteries have been designed to permit appropriate periodic testing as required by 10CFR50, Appendix A, Criterion 18.
- 3) SNPS FSAR Section 8.3.2.1 states that a battery service test will be performed during each refueling outage or at some other outage with intervals between tests not to exceed 18 months. This periodicity was intended to apply during the operations phase not the preoperations phase.

Actions to be Taken to Avoid Future Violations

The batteries will be subject to service testing in accordance with the Plant Staff surveillance program which commences prior to entering into the initial fuel load plant condition per Technical Specifications. When the surveillance program is initiated, scope and frequency of battery service will satisfy the Technical Specification capacity test requirements.

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When Action Will Be Completed

Action will be completed at the time the surveillance program is initiated which is prior to entering into an initial fuel load plant condition.

Very truly yours,

M. S. Pollock

M. S. Pollock
Vice President-Nuclear

cc: Mr. J. Higgins
All Parties

