

## LONG ISLAND LIGHTING COMPANY

SHOREHAM NUCLEAR POWER STATION P.O. BOX 618, NORTH COUNTRY ROAD • WADING RIVER, N.Y. 11792

JGHN D. LEONARD, JR. VICE PRESIDENT - OFFICE OF CONPORATE BERVICES AND VICE PRESIDENT - OFFICE OF NUCLEAR

## DEC 1 1 1990

SNRC-1775

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

> Response to Generic Letter 89-10, Supplement 3 Shoreham Nuclear Power Station - Unit 1 Docket No. 50-322

- Ref: (1) Generic Letter 89-10, Supplement 3, "Consideration of the Results of NRC-Sponsored Tests of Motor-Operated Valves," October 25, 1990.
  - (2) LILCO letter SNRC-1621 dated September 27, 1989 to the U.S. Nuclear Regulatory Commission from W.E. Steiger, Jr.; subject: Deferral of Certain Regulatory Activities.
  - (3) LILCO letter SNRC-1671 dated January 30, 1990 to the U.S. Nuclear Regulatory Commission from W.E. Steiger, Jr.; subject: Response to Generic Letter 89-10.
  - (4) Generic Letter 89-10, "Safety Related Motor-Operated Valve Testing and Surveillance - 10 CFR 50.54(f)," June 28, 1989.

## Gentlemen:

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The Long Island Lighting Company (LILCO) has reviewed Generic Letter 89-10, Supplement 3 (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) and SNRC-1671 (reference 3), LILCO has determined that the requested actions of Generic Letter 89-10, Supplement 3 as they pertain to SNPS will be indefinitely deferred. The deferred status of Generic Letter 89-10, Supplement 3 will be tracked on LILCO's computerized administrative tracking system.

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Generic Letter 89-10, Supplement 3 requests Boiling Water Reactor (BWR) licensees to assess the applicability of the data from the NRC-sponsored motor-operated valve (MOV) tests, to determine the "as-is" capability of the High Pressure Coolant Injection (HPCI), Reactor Core Isolation Cooling (RCIC), and Reactor Water Cleanup (RWCU) MOVs described in Generic Letter, Supplement 3, and to identify any deficiencies in those MOVs. Additionally, BWR licensees are requested to perform a plant-specific safety assessment to verify that the generic safety assessments performed by the NRC Staff and the BWR Owners' Group are applicable, and notify the NRC Staff that a plant-specific safety assessment report is available on the for Staff review.

Currently at Shoreham, the requirements and recommended actions of Generic Letter 89-10 (reference 4) have been indefinitely deferred as reported in SNRC-1671. This deferral is based on the present non-operating and defueled status of the plant whereby the timely remote actuation of MOVs under design basis conditions is no longer a significant concern.

Therefore, LILCO is hereby informing the Commission of its intent to indefinitely defer implementation of the recommendations and requested actions, and subsequent reporting requirements, of Generic Letter 89-10, Supplement 3. No safety significant concerns are presented as a result of this deferral since no MOVs are required to perform a safety significant function in SNPS' current status. The technical justification for deferral is based on the plant's current non-operating and defueled condition, and the resulting absence of any design basis event requiring timely remote MOV actuation, as noted in SNRC-1671. LILCO assures the Commission that this deferred action will be tracked via the LILCO Administrative Tracking System (LATS).

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

Very truly yours,

J. D. Leonard, Jr. Vide Pre-ident - Office of Corporate Services and Vice President - Office of Nuclear

MP/ap

cc: S. Brown T. T. Martin B. Norris

## AFFIDAVIT

STATE OF NEW YORK )

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COUNTY OF SUFFOLK )

I, JOHN D. LEONARD, JR., being duly sworn, depose and say that I am the Vice President, Office of Corporate Services and Vice President, Office of Nuclear 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-1775) 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.

Leonard

Sworn to before me this

11th day of December 1990 Dames A. Little

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