



# LONG ISLAND LIGHTING COMPANY

SHOREHAM NUCLEAR POWER STATION

P.O. BOX 618, NORTH COUNTRY ROAD • WADING RIVER, N.Y. 11792

Direct Dial Number

October 29, 1982

SNRC-783

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

SER Item #9 - Environmental Qualification  
Shoreham Nuclear Power Station - Unit 1  
Docket No. 50-322

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- Reference:
- (1) Letter from NRC (A. Schwencer) to LILCO (M. S. Pollock) dated 9/20/82 forwarding a Safety Evaluation Report on Environmental Qualification
  - (2) Letter SNRC-767 dated 9/9/82

Dear Mr. Denton:

Based on the Reference 1 letter and discussions with members of your staff on 10/20/82, clarification is hereby being provided for several items relevant to the environmental qualification issue. This clarification is as follows:

1. Status of Equipment in the TMI Action Item Program - The Reference (2) letter, Exhibit 5, Item 6, provided a summary of LILCO's review of the qualification status of all equipment required to be qualified by the TMI Action Plan. It should be noted that a typographical error was noted on page 2 of 4 of this exhibit, and a corrected page is included as Attachment 1 to this letter. This revised page should clarify any remaining misunderstanding.
2. Wetting of Equipment - A review of the various leakage paths associated with Reactor Building piping failures was performed to ensure no impact to safety related equipment essential for safe shutdown and decay heat removal. This review supported the response to FSAR Appendix 3C Section 3C5 and the SDV analysis submitted on 5/13/82 via SNRC-703. Encompassed in the study were potential wetting effects (by water up to 212°F) due to spraying, dripping, and/or cascading water passing through open hatches, penetrations, or stairwells. Appendix 3C will be modified in a future revision to state the scope of the flooding study as outlined above.

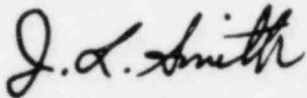
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3. Replacement Equipment - Section 5 of the Environmental Qualification Report dealing with replacement of 1E items will be revised as noted in Attachment 2. In addition, the QA program for the operations phase will comply with the guidance contained in Regulatory Guide 1.33, Revision 2 dated February, 1978 and, therefore, ANSI N18.7-1976/ANS-3.2, with certain clarifications as documented in LILCO letter SNRC-718. This commitment will be incorporated in Chapters 13 and 17 and in Appendix 3B of the FSAR in a future amendment.

It is LILCO's understanding that, except for interim justifications for mechanical and electrical equipment not yet qualified and GE Series 200 electrical penetrations, all items on SER Item Number 9, Environmental Qualification, are closed.

If you have any questions, please contact this office.

Very truly yours,



J. L. Smith  
Manager, Special Projects  
Shoreham Nuclear Power Station

RSH:mp

cc: J. Higgins  
All parties

2. Necessity of <sup>significant</sup> system modification
3. Necessity of complicating human/equipment interface
4. Inferior overall performance.

Alternatives are:

1. Replacement devices qualified to NUREG 0588 Category II
2. Best available (based on EQSR status)

At the module or component level for complex devices, the primary consideration is to maintain the design and functional integrity of the "qualified unit". The individual components or modules do not have a separate qualification status. If the components manufactured according to QA procedures, specifications and/or special reviewed procedures were used in the assembly of the equipment which was subsequently qualified, then in-kind replacement parts which meet the same requirements; i.e., "equal to or better than", assure the continued qualification status of the maintained equipment. The principle followed is not to jeopardize the integrity of the "unit".

The Shoreham Spare Parts Procurement Procedure will be amended to more specifically include equipment environmental qualification considerations.

This page is derived from Rev. 3 of the Environmental Qualification Report for Class 1E Equipment for Shoreham Nuclear Power Station.

5. Is all EOP display instrumentation included in EQR?

A: The EOP display instrumentation is included in the EQR as part of Reg. Guide 1.97, Rev. 2 study as type "A" parameters.

6. What is the status of the equipment in the TMI action item program?

A: The safety-related Class 1E Electrical Equipment required for those system commitments and additions for NUREG-0737 are incorporated in Shoreham's Environmental Qualification Program.

A review of the Shoreham TMI Action Plan responses (FSAR Volume 16) was conducted. The equipment identified as a result of this review is listed below and included in the EQSR, except mechanical components. Equipment required by R.G. 1.97 is identified by the designation "RG" in the EQSR.

TMI Items Addressed  
In Environmental Qualification Program

REF: FSAR Volume 16  
(Response to NUREG-0737)

Shoreham responses to the following of NUREG-0737 section reviewed:

I.D.1 Control Room Design Reviews

I.D.2 Plant Safety Parameter Display Console

II.B.3 Post Accident Sampling (1296)  
No Class 1E harsh environment equipment in these systems.

II.D.3 SRV Position Indication  
1B21\*PT153A-L

II.F.1 Accident Monitoring Sampling

1Z93\*PT003A,B Containment Pressure Monitoring

1Z93\*PT004A,B

1Z93\*LT001A,B Suppression Pool Level

1Z93\*LT012A,B

1D21\*RE085A,B Containment High Range Radiation Monitor

Other Class 1E equipment is located in a nonharsh environment.