



LONG ISLAND LIGHTING COMPANY

SHOREHAM NUCLEAR POWER STATION

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

Direct Dial Number

October 28, 1982

SNRC-781

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

SER Item II.F.2 - Inadequate Core Cooling (ICC)
Shoreham Nuclear Power Station - Unit 1
Docket No. 50-322

Dear Mr. Denton:

In Supplement No. 1 to the Safety Evaluation Report (SSER 1), Item II.F.2, the staff required LILCO to provide documentation addressing the inclusion of thermocouples in the final ICC monitoring system and to perform a study regarding the placement and number of thermocouples to detect ICC.

The BWR Owners' Group (BWROG), of which LILCO is a member, is in the process of conducting a generic study on the topic of ICC detection with a final report expected in the next few weeks. LILCO, in order to improve the reliability of the Shoreham RPV water level measurement systems, will conform to the applicable recommendations, if any, resulting from that study, and will continue to support the BWROG effort and their discussions with the staff on this issue.

It is LILCO's position, however, that based on the Shoreham specific study performed by Sol Levy, Inc., entitled "Review of Shoreham Water Level Measurement System", report number SLI-8221, forty (40) copies of which are attached hereto, the existing plant design does not pose an unacceptable risk due to possible water level measurement failures. It is, therefore, safe to operate Shoreham during the interim period prior to implementation of any improvements in water level measurement which may be identified by the generic study.

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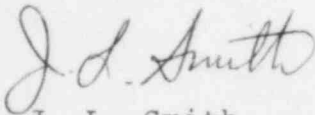
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It is LILCO's judgement that the proper way to detect ICC is by water level measurement rather than unproven alternative means, as described in Section 5 of the Owners' Group Report (Sections 3 and 5 of the BWROG report have been submitted to all parties involved in the Shoreham ASLB Hearings). It should be emphasized here that incore thermocouples are not considered to be an acceptable alternative to water level measurement for the detection of ICC in a BWR. LILCO should, therefore, be relieved of any current requirement for incore thermocouples and requests that such a requirement, as contained on page 22-71 of SSER No. 1, be deleted.

If you have any questions, please contact this office.

Very truly yours,



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

RWG:mp

Attachment

cc: J. Higgins
All parties