



Long
Island
Power
Authority

Shoreham Nuclear Power Station
P.O. Box 628
North Country Road
Wading River, N.Y. 11792

FEB 28 1994

LSNRC-2158

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

ATTN: Director, Office of Nuclear
Material Safety and Safeguards

Decommissioning Plan Change Notification:
Deletion of Annual Retraining on General Employee Training (GET)
Shoreham Nuclear Power Station - Unit 1
Docket No. 50-322

Ref: 1) Order Approving the Decommissioning Plan and
Authorizing Decommissioning of Shoreham Nuclear
Power Station, Unit 1, dated June 11, 1992
2) Long Island Power Authority Shoreham Nuclear Power
Station Decommissioning Plan, submitted
December 29, 1990

Ladies and Gentlemen:

In accordance with Condition 4(a), 4(b) and 4(c) of Ref. 1, LIPA hereby submits notification of a pending change to the Shoreham Decommissioning Plan (Ref. 2) as amended. It is LIPA's understanding that, unless directed otherwise, LIPA is authorized to implement the change described herein after 30 days of the date of this notification.

In Section 2.4.1 of Ref. 2, LIPA stated that the decommissioning staff will be retrained on GET annually. However, as discussed in Enclosure 1, LIPA has determined that this annual retraining is no longer warranted and will be deleted.

Enclosure 1 is the safety evaluation for this change to the Shoreham Decommissioning Plan. This safety evaluation has been reviewed and approved by LIPA's Site Review Committee (SRC). Evidence of this review, i.e., SRC Meeting Minutes, are included as Enclosure 2.

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Should there be any questions regarding the above information,
please feel free to contact me or the members of my staff.

Very truly yours,

A handwritten signature in black ink, appearing to read 'A. J. Bortz', with a long horizontal flourish extending to the right.

A. J. Bortz
Resident Manager

rap/kc
Enclosures

cc: L. Bell
C.L. Pittiglio
T.T. Martin
R. Nimitz

SHOREHAM NUCLEAR POWER STATION
SAFETY EVALUATION CHECKLISTCHECKLIST APPLICABLE TO: Proposed Change to SAP to Delete
Annual Retraining on GETSAFETY EVALUATION - PART A

Does the item to which this checklist is applicable represent:

Yes No A change to the station or procedures as described in the DSAR/DP; or
a test or experiment not described in the DSAR/DP?If the answer to the above is "Yes", attach a detailed description of the item being
evaluated and an identification of the affected section(s) of the DSAR/DP.

Does the item to which this checklist is applicable represent:

Yes No A decommissioning activity?If the answer to the above is "No", mark the next two questions as N/A and continue with
Parts B and C. Otherwise, answer the following questions.Yes N/A No Does the proposed decommissioning activity deviate from the DP?Yes N/A No Is the proposed activity a new decommissioning activity not
previously addressed in the DP?If the answer to both of the above two questions is "No", complete Parts B, C and D. If
the answer to either of the above two questions is "Yes", attach a detailed description of
the item being evaluated and an indication of the affected sections of the DP and complete
Parts B, C and D.SAFETY EVALUATION - PART BYes No Will this item require a change to the Station Technical
Specifications?If the answer to the above is "Yes", identify the specification(s) affected and/or attach
the applicable page(s) with the change(s) indicated.

SAFETY EVALUATION - PART C

As a result of the item to which this evaluation is applicable:

- Yes ___ No Will the probability of occurrence of an accident previously calculated in the DSAR/DP be increased?
- Yes ___ No Will the consequences of an accident previously evaluated in the DSAR/DP be increased?
- Yes ___ No Will the probability of malfunction of equipment previously calculated in the DSAR/DP be increased?
- Yes ___ No Will the consequences of a malfunction of equipment previously evaluated in the DSAR/DP be increased?
- Yes ___ No Will the possibility be created for an accident of different type than any previously evaluated in the DSAR/DP?
- Yes ___ No Will the possibility be created for a malfunction of a different type than any previously evaluated in the DSAR/DP?
- Yes ___ No Will the margin of safety as defined in the basis for any Technical Specification be reduced?

If the answer to any of the preceding is "Yes", an unreviewed safety question is involved. Justify the conclusion that an unreviewed safety question is or is not involved. Attach additional pages as necessary.

SAFETY EVALUATION - PART D

This section shall be completed if the item being evaluated is a decommissioning activity.

Will the proposed decommissioning activity have an adverse effect on:

- Yes ___ No ___ Nuclear safety?
- Yes ___ No ___ Compliance with regulatory requirements?
- Yes ___ No ___ Safe fuel storage?
- Yes ___ No ___ Security?
- Yes ___ No ___ Interfacing with operational systems?
- Yes ___ No ___ Contamination control?
- Yes ___ No ___ Isolation from clean systems?

N/A

If the answer to any of the preceding is "Yes", a general safety concern is involved.

The justification for answering the applicable Parts (A-D) above should be documented using the safety evaluation format shown in Appendix 12.2. Refer to Section 6.1 of this procedure for additional guidance.

PREPARED BY: Rout a Parly

DATE: 2/23/94

REVIEWED BY: Stephen Solomon

DATE: 2/25/94

Note: If this safety evaluation is the result of a Station Procedure Change Notice (SPCN), no review is required.

SAFETY EVALUATION - PART E

The SRC Secretary shall ensure this part is completed after SRC approval.

An information copy of this completed safety evaluation (including all attachments) has been sent to the IRP Chairman.

RP / 2/23/94
Initials Date

An information copy of this completed safety evaluation (including all attachments) has been sent to Quality Systems.

RP / 2/28/94
Initials Date

SAFETY EVALUATION TO SUPPORT DELETION OF ANNUAL RETRAINING ON GET

Purpose: The purpose of this safety evaluation is to determine if an unreviewed safety question is involved with the proposed deletion of annual General Employee Training (GET) retraining. This annual retraining is required for members of the decommissioning staff by section 4.1 of the Shoreham Decommissioning Plan.

DISCUSSION

The content of initial GET is discussed in Section 2.4.1 of the Shoreham Decommissioning Plan (SDP). This section states that employees at Shoreham will receive GET in the following subject areas, commensurate with their job duties:

- (1) General description of the plant and facilities
- (2) Job-related policies, procedures and instructions
- (3) Radiological health and safety
- (4) Emergency Plan
- (5) Industrial safety
- (6) Fire protection
- (7) Security
- (8) Quality Assurance

This section further states that individuals who have routine access to radiologically controlled areas, or who will routinely handle radioactive materials or equipment, (i.e., "decommissioning staff") will also be retrained on GET at least annually. The intent of annual GET requalification is to refresh the decommissioning staff in the above subjects, to provide updates which address major changes, and to strengthen any weaknesses identified with the initial GET.

The currently remaining major physical project activities will be largely completed in the second quarter of 1994. Fuel disposition, fuel channel disposition, liquid radwaste system decommissioning, and removal of the activated portions of the reactor bioshield wall are all expected to be completed by that time, thereby allowing major staff reductions. However, many of the existing decommissioning staff personnel who support this already ongoing work are due to receive GET requalification prior to completion of these activities.

Only the ongoing termination survey work and relatively limited decommissioning, such as decontamination of the Spent Fuel Pool Storage Pool and connected piping, will remain to be completed following completion of the above activities. Thus, while there may still be a need for some radiologically controlled areas onsite and some remaining radioactive materials, these will be of limited scope and safety significance.

In view of the above circumstances, there is considered to be little benefit to requalification of previously trained decommissioning staff personnel at this point in the project. While any new personnel would still require initial GET covering the subjects listed above (as applicable), it is believed that the GET which has already been provided, combined with other forms of training and routine information provided to the decommissioning staff as described below, adequately meet the intent of annual GET requalification for the limited remaining decommissioning activities at SNPS.

As the decommissioning project progresses, the required scope and content of GET diminishes. For example, there is no longer a Defueled Emergency Preparedness Plan in effect at SNPS; there will be no nuclear security/safeguards requirements applicable at SNPS once fuel disposition is complete; nor will there be a requirement to protect fuel from the effects of fire after that time. The decommissioning activities themselves inherently serve to systematically reduce, and eventually eliminate, the extent of radiological hazards which may exist. As these decommissioning activities wind down, any fire hazards which may be associated with them are also eliminated. In addition, LIPA has received exemptions from the NRC with regard to important regulatory changes which would otherwise have warranted treatment in GET requalification, such as the new 10 CFR 20 (radiation protection) and 10 CFR 120 (training rule). These exemptions, however, permit previous GET information on these subjects to remain valid.

With respect to personnel awareness of major changes to the facility configuration, GET requalification is superfluous. Decommissioning staff personnel are kept informed of major changes to the facility on an ongoing basis, primarily through the nature of the decommissioning project itself (decontamination and dismantlement) and the workers' direct involvement in planning and accomplishing the changes. Decommissioning progress and milestones are tracked on various schedules, are reviewed at many levels at numerous planning meetings, and are otherwise routinely communicated via memoranda and discussions throughout the organization.

It is important to note that considerable training or other indoctrination continues to be given, as appropriate, in other forums beyond GET, which are aimed at ensuring the safe and proper performance of specific jobs and addressing hazards or potential problems which may be associated with such jobs. Examples of this training include confined space entry training, fire technology, fire watch/fire patrol training, hazardous material transportation training, etc. In addition, prior to the workers embarking on significant field work activities in the current industrial safety-oriented environment (as well as a radiation exposure environment), various forms of indoctrination are employed as appropriate, including pre-job briefings, pre-shift daily briefings, Radiation Work Permit entry briefings, ALARA briefings, and "tailboard" safety meetings. Fire/safety drills and weekly station alarm tests

are conducted. For major evolutions, dry-runs are performed, as appropriate. Other, more generalized policy-oriented training is also given on an as-needed basis. An example of this type of training includes periodic "all-hands" briefings by the Resident Manager and/or other senior managers.

All of the above training and other indoctrinations are in addition to the experience and qualifications requirements upon which station management bases its personnel assignments, including contractors, to various positions and work activities at SNPS.

Lastly, the current Radiation Protection Program, which is independent of GET, has been extremely successful in minimizing personnel radiation exposures at SNPS. During 1993, only 20 people received any measurable radiation exposure and the total collective dose for the year was 0.337 person-rem. Only one minor skin contamination and two clothing contaminations were reported in 1993. With respect to the extent that GET may have contributed to these extremely low figures, it is believed that the previous GET provided within the last year would continue to provide any such benefits over the remaining limited time (i.e., several months) of decommissioning activities.

UNREVIEWED SAFETY QUESTION DETERMINATION

The probability of occurrence, or the consequences of an accident, or malfunction of equipment important to safety previously evaluated in the safety analysis report will not be increased. The accidents analyzed in Chapter 15 of the DSAR (Loss of AC Power, Liquid Radwaste Tank Rupture and Fuel Handling Accident) will not be affected by this proposed change to the SDP. The Loss of AC Power will not in itself result in any release of radioactivity. The Liquid Radwaste Tank Rupture accident is no longer relevant due to the decommissioning of the liquid radwaste systems. The Fuel Handling Accident is still credible but its consequences are less than those described in the DSAR due to decay of the fission product gases and due to shipment of over half of the fuel to another utility. Furthermore, the annual retraining in GET is "general" and not job-specific or technical training. GET was meant to supply basic information that would be applicable to the majority of site personnel. The absence of annual retraining on GET would not deprive the SNPS workers of knowledge that is necessary to prevent one of the above accidents.

The probability of occurrence, or the consequences of an accident, or malfunction of equipment important to safety previously evaluated in the Shoreham Decommissioning Plan (SDP) will not be increased. The ten accidents analyzed in Section 3.4 of the SDP are:

- Waste Container Drop
- Combustible Waste Fire
- Contaminated Sweeping Compound Fire
- Vacuum Filter-Bag Rupture

Oxyacetylene Explosion
Explosion of Liquid Propane Gas (LPG) Leaked from a Front-End
Loader (Forklift)
Contamination Control Envelope Rupture
Fuel Damage Accident
Effects of Natural Catastrophes
Breach of Physical Security Measures

The consequences of these accidents, as described in the SDP, will not be increased because: the decommissioning process has reduced the amount of radioactivity on site, or the accident scenario is not applicable, or, because more than half of the fuel has been shipped offsite. Furthermore, none of these accident scenarios are initiated in such a manner that their probability of occurrence could be increased by the deletion of annual retraining in GET. The absence of annual retraining on GET would not deprive the SNPS workers of knowledge that is necessary to prevent these accidents either.

The possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report or the Shoreham Decommissioning Plan (SDP) will not be created. The proposed change does not implement any new actions nor does it affect the way that any system is already operated. The proposed change is only a deletion of annual retraining and, as previously described, this training is covered by other LIPA practices or else will become obsolete during the time that this retraining would be held. The lack of GET retraining won't cause a person to create a new type of accident.

The margin of safety as defined in the basis for any technical specification will not be reduced. None of the bases will be affected by the deletion of annual retraining on GET. The personnel performing work on systems or equipment covered by technical specifications will still be required to be technically qualified to do their jobs. Their technical qualifications are not affected by the absence of annual GET retraining. (The technical specifications are expected to be eliminated upon completion of fuel removal.)

The proposed change will not result in environmental impacts different from and exceeding those set forth in the Supplement to Environmental Report December, 1990. This document does not discuss GET. Furthermore, it does not rely on annual retraining in GET for its conclusions on environmental impacts.

CONCLUSION

An unreviewed safety question is not involved by the deletion of annual retraining on GET. The proposed change will not result in environmental impacts different from and exceeding those set forth in the Supplement to Environmental Report, December 1990. However, it will be necessary to change the SDP.

MEETING MINUTESSite Review Committee MeetingDate Issued 2/28/94Attending:

A. Bortz - Chairman
 S. Schoenwiesner - Member
 L. Britt - Member
 T. Garvey - Member
 F. Petschauer - Member

R. Pauly - Alt Member
 P. Picciano - Alt Member
 A. Downs - Guest
 D. Filipowicz - Guest

Meeting Called to Order by Chairman:Date: February 25, 1994Time: 2:51 P.M.Meeting: 94-016Approval of Previous Minutes:

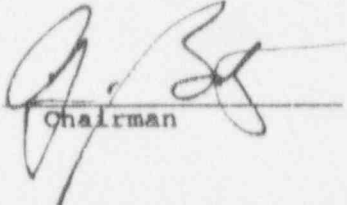
N/A

New Items

94-016-01 Safety Evaluation to Support Deletion of Annual Retraining on GET. Based on a presentation by S. Schoenwiesner, LRCD, this item has been reviewed in accordance with 10CFR50.59 and SRC has determined that there are no unreviewed safety questions. This item does not result in environmental impacts different from and exceeding those set forth in the licensee's Supplement to Environmental Report December 1990. This item was approved as revised.

Item Closed

94-016-02 Within the third quarter of 1994, the SRC shall review the basis for item 94-016-01 and confirm the completion of those activities which are projected for completion within the second quarter of 1994. Reinstatement of GET requalification shall be considered if completion of these activities has not occurred.

Item OpenMeeting Adjourned by Chairman:Time: 3:15 P.M.


 Chairman