

LONG ISLAND LIGHTING COMPANY

SHOREHAM NUCLEAR POWER STATION
P.O. BOX 604, NORTH COUNTRY ROAD • WADING RIVER, N.Y. 11792

SNRC-849 February 25, 1983

Mr. Richard W. Starostecki, Director Division of Project and Resident Programs U.S. Nuclear Regulatory Commission, Region I 631 Park Avenue King of Prussia, PA 19406

> NRC Inspection No. 83-02 Shoreham Nuclear Power Station, Unit No. 1 Docket No. 50-322

Dear Mr. Starostecki:

This letter responds to your letter of January 19, 1983 (CAL 83-01), which identified NRC Housekeeping concerns during your Special Team Inspection conducted by NRC Region I representatives on January 10th - 15th, 1983 at the Shoreham Nuclear Power Station of activities authorized by NRC License No. CPPR-95. Your letter contained a list of specific housekeeping attributes that we have incorporated into a supplemental site program for the Reactor Building, Control Building, and Screenwell. Your letter also requested, by February 24, 1983, a report detailing program status, results to-date, additional Management oversight initiated, and any additional actions taken to improve housekeeping at Shoreham.

The initial phase of the general cleanup of the Plant (Reactor Building, Control Building, and Screenwell) referenced in your letter has been completed except for the Primary Containment (Drywell) which is scheduled to be complete by February 28, 1983. Rough cleaning of all buildings is complete and we are in various stages of hand cleaning (vacuuming and washing down) in all areas. The effort will continue to a point prior to Fuel Load at which time Plant Maintenance will assume housekeeping responsibility.

The following response covers specific items listed in your letter and summarizes our overall housekeeping program for the buildings identified:

(1) Assignment of personnel for full-time housekeeping activities until housekeeping has improved to a satisfactory level.

Response

Approximately fifty-five (55) additional craft personnel

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(1) Response (Continued)

have been added on a permanent basis for housekeeping activities only. This is in addition to the existing twenty-five (25) crafts making a total of approximately eighty (80) people specifically working on housekeeping. In addition, a full-time UNICO Supervisor, reporting to the Chief Safety Supervisor, has been assigned to ensure adequate attention is given to the effort.

(2) Establishment of specific eating areas.

Response

Specific eating areas have been designated by site memorandum dated January 28, 1983, and issued to all site organizations and Contractors. Signs have been posted in all buildings to clearly identify the eating areas.

(3) Additional instruction to Plant personnel and all nonmanual Construction personnel regarding housekeeping policies and procedures.

Response

All Construction manual and selected non-manual personnel will have completed re-educational sessions on house-keeping policies and procedures by February 25, 1983. As of February 23, 1983, ninety (90) percent of the people have attended the sessions. Plant personnel are aware of housekeeping requirements via Plant procedures and instructions.

(4) Housekeeping inspections by Plant Staff and Construction Engineers.

Response

Since NRC CAL 83-01 housekeeping inspections by Construction have been and will continue to be done (and documented) twice a week for each building. Items identified by Plant Staff personnel are being referred to UNICO for correction.

(5) Surveillance and audit of housekeeping by Field Quality
Assurance personnel with emphasis on the issuance of "stop
work" orders for those areas not meeting cleanliness zone
requirements.

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(5) Response

Surveillance and audit of housekeeping activities by Field Quality Assurance has been and will continue to be performed once a week in one of the buildings under this program. LILCO feels that there are no areas (past, present, or future) that have been or will be in such a degraded state as to warrant "stop work" orders. However, we will comply if our Field Quality Assurance organization feels housekeeping conditions are of a nature to warrant such a directive.

(6) Review of the above activities by LILCO Management.

Response

The LILCO Manager of Construction and Engineering makes a formal and documented weekly tour and inspection in addition to normal day-to-day tours of the plant. This formal tour has been conducted for the past four (4) weeks and will continue until housekeeping has been upgraded to the satisfaction of the NRC. Other parties in the tour include Mr. J. Higgins, NRC Resident Inspector, a LILCO Field Quality Assurance representative, and the UNICO Management and Supervision responsible for the housekeeping effort. In addition to the Management attention of this tour, the General Superintendent and Chief Safety Supervisor each make at least two (2) additional unannounced inspections of these buildings every week. LILCO would like to point out that each week there is noticeable improvement from the previous week and Mr. J. Higgins, NRC Resident Inspector, concurs with this observation. We recognize also that further improvement is required.

Shoreham Construction Site Instructions (CSI 13.2) cover all of the above attributes including the following specific items:

- (a) A daily walk through on each shift for standing water in each Building/Area/Elevation. Any standing water observed will be cleaned up immediately.
- (b) All buildings will be considered a Zone V area which requires good Construction housekeeping practices. Areas/ Elevations within the buildings will be identified (posted) as Zones I through IV as required by Construction, LILCO Startup or LILCO Plant Staff activities. This will be completed by 2/28/83.

LONG ISLAND LIGHTING COMPANY Mr. Richard W. Starostecki February 25, 1983 Page Four Additional trash and scrap barrels have been placed in buildings at all Elevations. These will be emptied on a daily basis or as required. The LILCO Manager of Construction and Engineering has (d) held a meeting with all Contractor Site Senior Management and emphasized the importance of the housekeeping effort/program. Inspection and removal of all scrap and debris from cable (e) trays has been initiated. Inspections are conducted for proper protection of permanent plant equipment, including removal of all ladders, scaffolds, etc. from resting on spring cans, piping, ducts, cable trays, etc. and blocking access to same. I would like to take this opportunity to point out that there is still a substantial amount of work being performed by our Construction, Startup, and Plant Staff organizations which will obviously result in dirt and debris being produced. There are presently one thousand five hundred nineteen (1,519) manual craft personnel on the jobsite and much of the remaining work is "dirt producing" (insulating, grinding, fireproofing, etc.). In light of this level of activity, it is impossible to keep all areas perfectly clean at all times. There will continue to be items noted by NRC and the Field Quality Assurance organization and we will take immediate action to resolve them as soon as they are identified. With implementation of the program as outlined, I believe we are in compliance with CAL 83-01. If you require any additional information, please advise. Very truly yours, W. J. Museler Manager of Construction and Engineering Shoreham Nuclear Power Station WJM/mm cc: Mr. J. Higgins Parties Listed in Attachment 1

ATTACHMENT 1

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