



LONG ISLAND LIGHTING COMPANY

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MILLARD S. POLLOCK
VICE PRESIDENT - NUCLEAR

SNRC-775

October 7, 1982

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. 82-15
Shoreham Nuclear Power Station, Unit No. 1
Docket No. 50-322

Dear Mr. Starostecki:

This letter responds to your letter of August 30, 1982, which forwarded the report of the routine inspection of activities authorized by NRC License No. CPPR-95, conducted by Mr. Higgins and others of your office on June 19-July 31, 1982. Your letter stated that it appeared that several of our activities were not conducted in full compliance with the NRC requirements. The apparent noncompliances and our responses follow:

- A. Apparent Noncompliance with 10CFR50
Appendix B Criterion XI, FSAR Section
17.2.11, and QA Manual Section 11

10CFR50, Appendix B, Criterion XI, FSAR paragraph 17.2.11, and the LILCO Quality Assurance Manual, Section 11 all require that a test program be established to assure that testing is performed in accordance with written test procedures and that test results are documented.

Startup Manual, paragraph 4.2.2, states that each test will be performed in strict conformance with the approved test procedure and that all test data will be accurately and properly recorded.

CG.000.004-5, "Instrument and Control Component Checkout and Calibration", steps 3.3.10 and 7.2 require that the station calibration procedure be used for the calibration of safety-related instruments. Step 3.3.14 specifies that the desired instrument setting and required accuracy be entered on the data sheet prior to issuance to the technician for calibration performance.

CG.000.022-5, "480 VAC MCC Cubicle and Control Circuit Checkout", step 7.4, requires several mechanical checks on auxiliary relays and provides a space on the data sheet for documenting these checks.

Contrary to the above Checkout and Initial Operations Tests, for the Reactor Protection, Core Spray, High Pressure Coolant Injection, Reactor Building, Closed Loop Cooling Water Systems, and the Emergency Diesel Generators, were not performed and documented in strict conformance with the approved test procedures as follows:

1. Test results did not agree with the specified desired values of the procedure, no tolerances were given and the test results were accepted in eleven instances.
2. Specified tolerances were exceeded and test results were accepted in four instances.
3. No station calibration procedures were specified on nine completed and approved CG.000.004 Data Sheets for safety-related instruments.
4. There was no setting or accuracy specified for the reset points on two completed and approved CG.000.004 Data Sheets.
5. The relay mechanical checks portion of the approved CG.000.022 Data Sheet was not completed in one instance.

Corrective Action and Results

For the five concerns identified above, the following results have been achieved:

1. For the eleven instances noted where test results did not agree with the specified desired values, six (6) instances were verified as valid findings. For these six (6) instances the required tolerances were obtained and the original results were found to be within these limits and acceptable. No retesting was required.

The five instances that are not considered valid findings were reviewed and found to be not applicable.

2. For the four instances noted where specified tolerances were exceeded and test results accepted, all instances were verified as valid findings. For these four

instances, two findings were within the required tolerance, after the tolerance was determined, and no retesting was required. The two remaining findings required retesting of the subject components which was satisfactorily completed.

3. For the nine instances noted where station calibration procedures were not specified on completed and approved data sheets, all nine were verified as valid findings. Documentation has been added to the C&IO file referencing the applicable station procedures or vendor manual. For all nine, the test results were reviewed against the applicable station procedures or vendor manuals and found to be acceptable.
4. For the two instances noted where no setting or accuracy was specified on the completed and approved data sheets, both cases have the setting and accuracy stated. No further action is required.
5. For the one instance noted where the mechanical checks portion of the approved data sheet was not filled in, a subsequent package was issued and retesting was completed satisfactorily.

Corrective Action and Results

LILCO Startup Management held a staff meeting on September 17, 1982. The need for each test engineer to properly record and document all testing was reviewed. In addition to the present reviews of C&IO test results by the test engineer, and lead startup engineer, a final documentation review will be conducted by an independent reviewer within the startup organization prior to placing future completed test results into the Project Resource Center.

Date of Full Compliance

Full compliance will be achieved on November 1, 1982.

- B. Apparent Noncompliance with 10CFR50
Appendix B Criterion V, FSAR Section
17.2.5, and QA Manual Section 5

10CFR50, Appendix B, Criterion V, Shoreham FSAR paragraph 17.2.5, and the LILCO Quality Assurance Manual Section 5 require that activities affecting quality be accomplished in accordance with documented instructions and procedures. Startup Manual, paragraph 8.4.4 states that when a test is

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stopped and then re-released for performance, the Lead Startup Engineer documents which prerequisites must be established on Startup Form 8.4.

Startup Form 8.4, dated June 18, 1982, for PT.654.007, called for the performance of the valve lineup specified in Appendix 12.4 of PT.654.007. Appendix 12.4 specified:

Valve T23-01V-0008A - closed
Valve T23-01V-7002A - open

PT.654.007, Appendix 12.3, step 7 specifies that valve 3005A be opened.

Contrary to the above on June 19, 1982, while on step 9 of Appendix 12.3 of PT.654.007:

1. No new Appendix 12.4 valve lineup had been filled out, and
2. Valve T23-01V-008A was open.
Valve T23-01V-7002A was closed.
Valve 3005A was in the mid-position.

Corrective Action and Results

PT.654.007 was recalled and revised to incorporate the exceptions taken. The revised procedure was approved on July 29, 1982 and released for the performance of the test on August 9, 1982. The Joint Test Group then reviewed the test results, approving them on September 10, 1982.

Actions to Prevent Recurrence

The Test Engineers involved in conducting PT.654.007 were reinstructed by the Lead Startup Engineer-HVAC and the Assistant Startup Manager in the proper methods of conducting/ following approved preoperational test procedures. This was further enhanced at a general staff meeting held on September 17, 1982, when the Startup Manager emphasized the need to perform preoperational tests in accordance with the approved test procedures, and that deviations must be documented in accordance with the appropriate "test change notice" or "exception" methods specified in the Startup Manual.

Date of Full Compliance

All items of this violation have been resolved.

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C. Apparent Noncompliance with 10CFR50
Appendix B Criterion V, FSAR Section
17.1.5A, and QA Manual Section 5

10CFR50, Appendix B, Criterion V, Shoreham FSAR paragraph 17.1.5A, and the LILCO Engineering Quality Assurance Manual, Section 5 all require that activities affecting quality be accomplished in accordance with documented instructions and procedures.

Quality Control Instruction QCI No. FS1-F11.5-001A, "As-Built Piping Systems Inspection", steps 5.2.1 and 5.3, require that the piping systems installation be inspected by Field Quality Control (FQC) to verify the accuracy of the approved "As-Built" isometrics and that any discrepant conditions be reported via a Deficiency Correction Order.

Contrary to the above:

1. The T48 (Primary Containment Atmosphere Control) System was inspected and accepted by FQC on June 15, 1982 to verify the accuracy of the approved "As-Built" isometric T48-IC-979 (line GR103-2-1).
2. On July 3, 1982 a temporary hanger, which was welded to a primary containment embedment plate, remained in place on line GR103-2-1 of the Primary Containment Atmosphere Control System. This hanger had apparently been installed prior to June 15, 1982.
3. No Deficiency Correction Order has been written to report and subsequently remove the temporary hanger.

Corrective Action and Results

The temporary support located on 1T48*GR103-2-1, IC-979, has been identified on DCO #17273. The support has been removed and the DCO closed.

Steps Taken to Prevent Recurrence

The FQC As-Built Line Walk Group has been instructed to more closely monitor the removal of temporary pipe supports during line walks to verify the accuracy of "As-Built" isometrics.

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Date of Full Compliance

Full Compliance has been achieved.

Very truly yours,

M. S. Pollock

M. S. Pollock
Vice President-Nuclear

cc: Mr. J. Higgins
All Parties

