



LONG ISLAND LIGHTING COMPANY

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MILLARD S. POLLOCK
VICE PRESIDENT - NUCLEAR

SNRC-795

December 16, 1982

50-322

Mr. T. H. Novak
Deputy Director for Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Novak:

The Long Island Lighting Company is firmly committed to the construction and operation of a safe and reliable Shoreham Nuclear Power Station. The management of LILCO throughout the construction phase has always supported good quality practices in all aspects of engineering, procurement, construction and equipment operation. This position will be maintained without exception for the life of the plant.

Our testimony before the Atomic Safety and Licensing Board demonstrated that the Shoreham design and construction program were exemplary. I can assure you, as a corporate officer, that throughout its operational phase, the quality of plant operations, maintenance, design changes and plant modifications, to name just a few, will be at least as good as has been built into the construction program. We understand from the NRC Staff's testimony before the ASLB that LILCO and the Staff have different views on the meaning of "important to safety" in GDC-1. Although the Staff has not yet established a list of equipment "important to safety", it is the Staff's view that the term is broader than the safety related category. GDC-1 requires that quality standards and programs commensurate with the safety function performed be applied to systems, structures and components important to safety. Since LILCO has applied quality standards and programs to all plant structures, systems and components commensurate with their importance to safety and reliable operation, LILCO has met GDC-1 as interpreted by the Staff witnesses. Moreover, LILCO's commitment, as set out below, should provide you with the assurance that LILCO will continue to meet this interpretation of GDC-1 in the future.

Specific quality programs as herein defined have been and will continue to be applied to all plant components and systems as a function of their importance to safe and reliable operation. As explained in our ASLB testimony, appropriate quality standards

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have been specified in the original design documents for all features of the plant. These quality standards shall be maintained throughout the life of the plant in all activities. For example, in the area of procurement, LILCO has procedurally mandated quality and technical requirements for the procurement of items and services so that they are purchased to requirements equal to or exceeding those of the original equipment. This is accomplished by requiring purchase to the original specification or to the codes and standards used for the original item or service. In the area of quality assurance, also as explained in our ASLB testimony, LILCO has required the implementation of appropriate quality assurance controls during the design and construction phase for all plant items consistent with their importance to safe and reliable operation. For the operational phase of Shoreham, LILCO will continue to require the implementation of quality assurance controls in accordance with the commensurate regulations, specifically Appendix B to 10 CFR50 for safety related plant items. For the remaining plant items the quality assurance controls will include, as appropriate to overall plant safety and reliability, assurance of proper design requirements, procurement controls, receipt inspection, inspections of various plant activities, records and audits. The quality standards and assurance controls commensurate with the function of the equipment will be maintained. Thus, quality standards commensurate with the function of the equipment will be maintained.

We have a well conceived and implemented corrective and preventive maintenance program which covers both safety related and non-safety related systems and components. Some of the systems currently in place are:

- (a) Preventive Maintenance (PM) Program - Consists of routine periodic maintenance activities performed on station mechanical, electrical and electronic equipment to ensure its continued operation. Routine preventive maintenance includes such items as: lubrication, greasing, filter changes, testing and general inspections. The PM program is computerized and provides weekly and monthly schedules for the planning of the work activities.
- (b) Corrective Maintenance Program - Consists of non-routine maintenance activities. This program is performed using the Maintenance Work Request (MWR). The Maintenance Work Request is an administrative maintenance control document used in conjunction with a computer record system to initiate, plan, track and report station maintenance

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with precise supervisory control on all station components, equipment and structures. The MWR specifies the appropriate quality controls to be applied to a particular maintenance activity.

- (c) Equipment History Program - Provides trending performance for Shoreham equipment to anticipate potential failure frequency and establish preventive maintenance criteria.
- (d) NOMIS - Run by NUS Corporation (a consultant) - This system provides an exchange service with all operating nuclear facilities for equipment performance information.
- (e) Stores Inventory - Tracks current stock and required environmental controls and other storage requirements.

Our maintenance personnel review and incorporate, as appropriate, information from INPO (O&MR, NOTEPAD, NPRDS), Service Information Letters, Technical Information Letter, I&E publications, and manufacturer's submittals. These personnel are well trained through seminars, vendor workshops and on-site training.

I trust this letter provides the assurances of LILCO's dedication to maintaining a safe and reliable facility that the NRC is seeking and that your conclusions will be conveyed to the Atomic Safety and Licensing Board.

Very truly yours,



M. S. Pollock
Vice President - Nuclear

MSP/lac

cc: Mr. Jim Higgins
All Parties