



LONG ISLAND LIGHTING COMPANY

175 EAST OLD COUNTRY ROAD · HICKSVILLE, NEW YORK 11801

MILLARD S. POLLOCK
VICE PRESIDENT - NUCLEAR

SNRC-802

December 1, 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. 82-26
Shoreham Nuclear Power Station, Unit No. 1
Docket No. 50-322

Dear Mr. Starostecki:

This letter responds to your letter of October 29, 1982, which forwarded the report of the routine inspection of activities authorized by NPC License No. CPPR-95, conducted by Messrs. J. C. Higgins and P. Hannes of your office on September 9-October 13, 1982. Your letter stated that it appeared that one of our activities was not conducted in full compliance with the NRC requirements. The apparent noncompliance and our response follows:

Apparent Noncompliance with 10CFR50
Appendix B Criterion VI, FSAR Section
17.1.6A, and QA Manual Section 6

10CFR50, Appendix B, Criterion VI, FSAR paragraph 17.1.6A, and the LILCO Engineering Quality Assurance Manual paragraphs 6.3.2 and 6.3.4 require that measures be established to control the issuance of drawings, including the prompt incorporation of changes and a review for adequacy before release.

Engineering and Design Coordination Report (E&DCR) No. F-6085B, dated June 20, 1979 indicated wiring changes to be made on drawings 1.61-154 and 1.61-156.

Contrary to the above, measures did not ensure the prompt incorporation of changes into drawings in that Revision C to drawings 1.61-154 and 1.61-156, issued in 1981, indicated that E&DCR No. F-6085B had been incorporated, when in fact the wiring changes of the E&DCR were not incorporated into these drawings.

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Comments

General Electric Field Disposition Instructions (FDI's) are authorized for use at the Shoreham site by E&DCRs. Physical incorporation of FDI's onto General Electric Drawings is accomplished by General Electric. Revisions to GE drawings are reviewed by SWEC upon receipt to determine whether the FDI/E&DCR has been incorporated into the drawing. If the FDI/E&DCR is determined to have been incorporated, the incorporated E&DCR is listed on the drawing flap, and Document Control posts the E&DCR as being incorporated on the master E&DCR log upon receipt of the distribution prints.

When the GE subvendor's drawings were revised in 1981 (drawings 1.61-154 and 1.61-156), the change authorized by E&DCR F-6085B was misconstrued as being incorporated by the reviewers and so marked on the drawing flaps. In addition, one of the subvendor drawings was of poor quality, and the drawing went through SWEC's "enhancement" program to bring it up to microfilm reproducibility standards. The previous 1974 drawing was used as a reference, and the SWEC 1974 review and approval information was inadvertently transferred to the revised drawing flap. Because the review block had been completed, that drawing was not reviewed further.

Corrective Action Taken and Results

To determine the extent of these problems, SWEC has reviewed a sample of 175 manufacturers' drawings, including 100 electrical drawings, spanning a period of 11 months bracketing the time period noted. The review also included a sample of drawings from the enhancement program. Special emphasis was placed on two categories of GE subvendor drawings, because the majority of E&DCRs were listed against these categories. No additional discrepancies were found. Based on this review, we believe these two discrepancies to be isolated cases and not indicative of a trend.

Drawings 1.61-154 and 1.61-156 have been subsequently revised by SWEC with GE authorization, reviewed, and are currently in the distribution process.

It should be noted that the authorized change had been correctly made to the plant equipment in 1980 as a result of the FDI/E&DCR.

Action Taken to Prevent Recurrence

As part of the Shoreham Design Document Update Program, manufacturers' drawings are updated in accordance with SWEC

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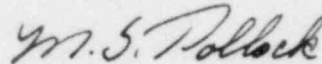
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Project Procedure No. 38. According to the October 29, 1982 E&DCR log, approximately 2200 E&DCRs are shown as outstanding against electrical equipment vendors' prints. Of these, more than 1700 are General Electric responsibility, with the remaining 500 SWEC responsibility. Of the SWEC responsibility drawings, more than 300 outstanding E&DCRs showing on the October 29 printout already have been incorporated. The remaining E&DCRs will be incorporated on a regular basis, in conjunction with the overall Design Document Updating Program. It is anticipated that the number of unincorporated E&DCRs concerning vendors' prints will be reduced to the level of one month's backlog by the end of the power ascension test program.

Date of Full Compliance

For the specific violation item, full compliance will be achieved by January 15, 1982, with the SNPS site distribution of revised drawings 1.61-154 and 1.61-156.

Very truly yours,



M. S. Pollock
Vice President-Nuclear

cc: Mr. J. Higgins
All Parties

STATE OF NEW YORK)
 : ss.:
COUNTY OF NASSAU)

MILLARD S. POLLOCK, being duly sworn, deposes and says that I am a Vice President of Long Island Lighting Company, the owner of the facility described in the caption above. I have read the Notice of Violation dated October 29, 1982, and also the response thereto prepared under my direction dated December 1, 1982. The facts set forth in said response are based upon reports and information provided to me by the employees, agents, and representatives of Long Island Lighting Company responsible for the activities described in said Notice of Violation and in said response. I believe the facts set forth in said response are true.

Millard S. Pollock
MILLARD S. POLLOCK

Sworn to before me this
1st day of *December*, 1982.

Rosa Lee Oliveros

ROSA LEE OLIVEROS
Notary Public, State of New York
No. 30-4708263
Qualified in Nassau County
Commission expires Mar. 30, 19*84*