



LONG ISLAND LIGHTING COMPANY

175 EAST OLD COUNTRY ROAD • HICKSVILLE, NEW YORK 11801

MILLARD S. POLLOCK
VICE PRESIDENT-NUCLEAR

SNRC-844
March 2, 1983

Mr. Darrell G. Eisenhut, Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Eisenhut:

I appreciated the opportunity for my staff and me to meet with you and the other members of the NRC Staff last Friday to elaborate upon the matters stated in my letter to Mr. Novak of December 16, 1982 (SNRC-795).

It is noted that, as a result of our presentation and the examples we described, you and the Staff found our existing programs, which were developed over the years to assure safety, high reliability and availability of an integrated plant, to be responsive to NRC concerns regarding non-safety related structures, systems and components. Obviously, it was not possible in my letter of December 16, 1982, to fully convey our sensitivity and philosophy with regard to quality measures applied to the entire station.

Your letter of February 18, 1983, as I interpret it in light of our presentation, requests that for non-safety related structures, systems and components, LILCO amend the FSAR to include in the existing preventive and corrective maintenance program, design change control program, and procedures for procurement of equipment, the procedures for modification and removal of equipment from service and the applicable portions of the Quality Assurance Program, a suitable commitment that the responsible personnel implementing these programs and procedures shall, in exercising their judgment on the appropriate measures to be applied to non-safety related systems, structures, components, and associated plant computer software, consider the safety significance accorded to a non-safety related structure, system or component, given to it in the FSAR, the technical specifications and the emergency operating procedures. The responsibilities of the Manager of Quality Assurance and the

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charters of the Review of Operations Committee and the Nuclear Review Board would also reflect this consideration to assure that in carrying out their responsibilities their decisions are consistent with the FSAR, technical specifications and emergency operating procedures. The other programs described in my letter of December 16, 1982 are representative of those currently applied to maximize the effectiveness of our programs and will be utilized as appropriate to maintain our commitment as defined above.

Accordingly, I am writing to make this commitment on behalf of LILCO with the understanding that the NRC Staff will be satisfied that LILCO has and will be able to continue to meet GDC 1, as the Staff interprets it, with regard to non-safety related structures, systems and components during the operation of Shoreham.

Very truly yours,

M. S. Pollock

M. S. Pollock
Vice President - Nuclear

MSP/lac

cc: Mr. J. Higgins
All Parties