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August 26, 1994

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SUBJECT: REVIEW OF ISAP SUBMITTALS DATED MARCH 23 AND JUNE 30, 1994
 (TAC M89155)

Dear Mr. Opeka:

In a letter dated March 23, 1994, Northeast Nuclear Energy Company (NNECO) submitted to the NRC an updated report on the Millstone Unit No. 1 Integrated Safety Assessment Program (ISAP). In a letter dated May 31, 1994, the staff indicated, after conversations with NNECO, that the 60 day response letter would be delayed until after NNECO submitted a supplemental ISAP update. The supplemental ISAP update was being submitted due to the large number of topics being closed out during the recently completed refueling outage. In a letter dated June 30, 1994, NNECO submitted the supplemental ISAP update.

In accordance with the Program Plan identified in Amendment No. 56 for Millstone Unit No. 1, the NRC has reviewed the ISAP updates and the staff's comments are contained in the attachments. Based on that review, the staff notes that of the 144 ISAP topics, 20 topics should remain open within ISAP. Enclosure 1 lists all the ISAP topics NNECO considers open and the NRC staff's understanding of them, Enclosure 2 lists the ISAP topics NNECO considers closed but are still under NRC staff review, and Enclosure 3 lists the ISAP topics the NRC staff agrees can be closed out.

Further NRC review of closed ISAP topics, if any, will be performed by inspection or audit. The NRC staff remains available to discuss these issues with you.

Sincerely,

Original signed by

James W. Andersen, Acting Project Manager
 Project Directorate I-4
 Division of Reactor Projects - I/II
 Office of Nuclear Reactor Regulation

Docket No. 50-245

- Enclosures: 1. ISAP topics considered open by NNECO
 2. ISAP topics NNECO considers closed but are still under staff review
 3. ISAP topics the staff agrees can be closed

cc w/encls: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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Sincerely,

A handwritten signature in black ink, appearing to be "JW Andersen", written over a circular stamp or mark.

James W. Andersen, Acting Project Manager
Project Directorate I-4
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

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ENCLOSURE 1

ISAP TOPICS CONSIDERED OPEN BY NNECO

<u>Topic Number</u>	<u>Title</u>	<u>Comment</u>
1.06	Seismic Qualification of Safety-Related Piping	By letter dated 9/4/91, the staff stated that NNECO's commitment to complete the remaining modifications during cycle 14 and 15 refueling outages was acceptable and that NNECO should submit any schedule changes to the NRC for review. In the ISAP update dated 6/18/93, NNECO stated that developments in the area of seismic analytical techniques may provide further bases for resolution. In the ISAP update dated 3/23/94, NNECO stated that they plan to postpone the remaining modifications until the above-mentioned developments have been further explored. NNECO also stated that the issue would still be resolved by cycle 15. The staff notes the change in this item and awaits NNECO's submittal outlining their plans. The staff still considers cycle 15 as NNECO's commitment date, any change to this date must be submitted to the staff with the appropriate justification.
1.07	Control Room Design Review	All the remaining human engineering discrepancies are scheduled to be closed out or dispositioned by the cycle 15 refueling outage. The staff awaits NNECO's review of the remaining issues.
1.09	Regulatory Guide 1.97 Instrumentation	By letter dated 12/30/93, the staff issued a SE concerning RG 1.97 instrumentation. The staff noted NNECO's planned modifications for variables A-7 and A-8 (topic 1.09.4) and the schedule for implementation during the cycle 14 and 15 outages. This was found acceptable. The staff also noted: (1) that the environmental qualification issue for position indication for 22 primary containment isolation valves is still being evaluated (topic 1.09.5) and (2) that two variables, D-21 and D-22, were not environmentally qualified and that NNECO should provide additional information for these instruments. These last two issues should be addressed before this topic is closed.
1.14	Appendix J - Modifications	In a letter dated 4/20/94, NNECO submitted its position regarding Appendix J testing of 12 containment penetrations. In a letter dated 8/2/94, NNECO submitted information on 2 additional penetrations. Both submittals are currently under staff review.

- 1.52 SRV Failure - Setpoint Drift NNECO has been keeping this topic open to address recommendations from the BWR Owners Group (BWROG) which was addressing this issue. NNECO has determined that the most appropriate modification for Millstone 1 is to replace three of the existing pilot discs. This portion of the project was completed during the cycle 14 refueling outage. The remaining three discs will be replaced during the cycle 15 refueling outage if deemed appropriate (consistent with BWROG recommendation to replace the discs in two phases in order to verify performance and effectiveness).
- 1.101 Fire Detection System Code Compliance This topic involves certain modifications to the fire detection system to ensure compliance with the intent of the National Fire Protection Association (NFPA) code. Any modifications which will result in a significant change in the scope of the existing project assignment will be evaluated in a future ISAP report.
- 1.102 Fire Suppression System Code Compliance This topic involves certain modifications to the fire suppression system to ensure compliance with the intent of the NFPA code. Any modifications which will result in a significant change in the scope of the existing project assignment will be evaluated in a future ISAP report.
- 1.111 Motor Operated Valve Testing, GL 89-10 NNECO responded to GL 89-10, certifying that detailed programs were being developed to address safety-related motor operated valve testing and surveillance. By letter dated 5/4/92, NNECO advised the staff of a change in the program description schedule till 12/31/92. In a letter dated 10/22/92, the staff stated that the schedule was acceptable, however, NNECO's commitment to meet the schedule requested in the first paragraph of item i (and item k) of GL 89-10 for completing recommended actions a through h of the generic letter by three refueling outages after 11/28/89 (cycle 15), remains unchanged. In the 6/30/94 ISAP update, NNECO stated the testing will be completed during the cycle 15 outage.
- 1.112 Service Water System Evaluation, GL 89-13 This topic addresses GL 89-13, "Service Water System Problems Affecting Safety-Related Equipment." In a letter dated 4/3/92, NNECO provided an update on the implementation of the five recommended actions. NNECO stated that items 1, 2, 3, and 5 were accomplished on schedule and that item 4 would be completed prior to the startup from the cycle 14 refueling outage. In the 6/30/94 ISAP update, NNECO stated that instrumentation was installed in the service water system and that a letter documenting the closure of item 4 would be submitted.

- 1.119 Resolution of Unresolved Safety Issue A-46 This topic encompassed NNECO's plant-specific response to USI A-46, "Seismic Qualification of Equipment in Operating Plants." NNECO submitted its response on 9/21/92. In a letter dated 11/23/92, the staff approved NNECO's schedule for implementation. The reports are scheduled to be completed 180 days following the completion of the cycle 15 refueling outage.
- 1.122 Split Loss-of-Normal Power Logic By letter dated 9/27/91, the NRC provided its position that the Millstone 1 undervoltage protection scheme should be implemented with a split-logic design. In the 6/18/93 ISAP update, NNECO stated that it plans to implement the modifications associated with this issue in the cycle 15 refueling outage. In a letter dated 7/2/93, NNECO provided a description of the conceptual design of the new proposed, split-logic LNP detection scheme. The NRC staff, in a letter dated 12/28/93, accepted (with some comments) NNECO's proposed resolution. The staff awaits the proposed TS change (to be submitted at least 6 months prior to the cycle 15 refueling outage) associated with the modifications.
- 1.123 LPCI/CS Pipe Temperature Modifications NNECO's postaccident analyses indicate that the torus water temperature could reach temperatures as high as 207°F following a design basis loss of coolant accident. In the 6/18/93 ISAP update, NNECO stated that they have initiated an assessment which will analyze the low pressure coolant injection (LPCI) and core spray (CS) piping to ensure that design code stress levels will not be exceeded during postaccident conditions and that an ISAP evaluation will be performed upon further definition of the project scope. In May 1994, after concerns by the NRC staff, NNECO committed to complete the required evaluations and modifications by July 28, 1994. In a letter dated 7/28/94, NNECO stated that they had completed the evaluations and that no modifications were needed.

- 1.126 BWR Stability
- Following an instability event at LaSalle Unit 2 in March 1988, the NRC staff, in conjunction with the BWROG and General Electric performed studies related to the event. The NRC staff issued SECY-92-386 on 11/16/92, which conveyed the results of the studies and provided several long-term corrective actions. In the 3/23/94 ISAP update, NNECO stated it will evaluate any appropriate hardware modifications within ISAP and schedule the modifications accordingly. On July 11, 1994, the staff issued GL 94-02, "Long-Term Solutions and Upgrade of Interim Operating Recommendations for Thermal-Hydraulic Instabilities in Boiling Water Reactors," which required BWR licensees to (1) take appropriate actions to augment its respective procedures and training, and (2) submit a plan describing its long-term stability solution and implementation schedule. This response is to be submitted within 60 days of the GL.
- 1.128 TSI Thermo-Lag Fire Barrier
- This topic was opened to evaluate solutions to concerns which were identified in Bulletin 92-01. An ISAP evaluation will be performed on any proposed modifications.
-
- 2.103 Battery Charger Replacement
- This topic addressed the replacement of existing battery chargers with battery-eliminating type, self-regulating chargers. The project is scheduled for the cycle 15 refueling outage.
- 2.107 Class 1E Generator Antimotoring Protection
- This topic addresses whether sufficient protection exists to prevent damage or degradation in the event any safety-related power source becomes inadvertently powered by its associated bus, when the generator is shut down. The modifications are scheduled to be completed during the cycle 15 refueling outage.
- 2.108 Generator Antimotoring Protection While Shutdown
- This topic evaluated the need for supplementary reverse current protection for the main generator. The modifications are scheduled to be completed during the cycle 15 refueling outage.
- 2.127 Replacement of LP-43A/B, LP-44A/B, and IC-10 Motor Operators
- The motor operators for these valves are currently not required to be environmentally qualified (EQ). In the 3/34/94 ISAP update, NNECO stated the motor operators for LP-43A/B and LP-44A/B were recently determined to be operable in the reactor building high energy line break environment with only a minor modification. These modifications were made during the cycle 14 outage. Diagnostic testing on IC-10 will be performed at a later date.

ENCLOSURE 2

ISAP TOPICS NNECO CONSIDERS CLOSED BUT ARE STILL UNDER STAFF REVIEW

- 1.108 Torus Vacuum
- This topic addressed concerns associated with results of other plant reviews conducted in response to Generic Letter 88-14, "Instrument Air Supply System Problems Affecting Safety-Related Equipment." Unit 1 containment is configured with two redundant vacuum breaker relief lines from the torus to the reactor building. Each line has an air-operated butterfly valve and a check valve. Since the air-operated butterfly valves fail open on a loss of air or AC power, the specific concern relates to their inability to function as the second valve of the two valve containment isolation function. NNECO performed an analysis to determine the maximum possible benefit that could be derived from resolving this issue. In a letter dated 11/30/90, NNECO stated that the project received a very low score and ranking. Therefore, NNECO concluded that the project was not warranted and the topic should be closed. This topic is under staff review and, therefore, should remain open.
- 1.43 Water Hammer
- Changes include the addition of an undervoltage alarm from the vital AC bus as well as an additional DC powered ATWS level indication on the main control board and upgraded procedural guidance. Most of the modifications have been completed. In the 3/23/94 ISAP update, NNECO stated that it no longer plans to install an additional DC powered level indicator on the main control board and, therefore, this subtopic was complete. The staff is currently reviewing this issue so, therefore, this portion of the topic should remain open.
- The NRC staff noted in NNECO's 3/23/93 ISAP update that subtopic 1.43.1, Reactor Vessel Overfill Protection, was proposed for closure. The NRC staff is reviewing all the GL 89-19 responses. The NRC staff will keep this subtopic open until the Millstone 1 review is completed.

ENCLOSURE 3

ISAP TOPICS THE STAFF AGREES CAN BE CLOSED

- 1.104 Pump Flow Rate Instrumentation
- This topic addressed an evaluation of procuring and installing instrumentation necessary to measure the flowrate of various pumps. In the 10/23/92 ISAP update, NNECO split the topic into two subtopics (1.104.1 - Service Water Pump Flow Rate Instrumentation and 1.104.2 - Pump Flow Rate Instrumentation).
- Topic 1.104.1 addressed the installation of instrumentation to monitor flow through portions of the service water system. In the 6/30/94 ISAP update, NNECO stated that these modifications were completed during the cycle 14 outage, therefore, this subtopic can be closed.
- Topic 1.104.2 addressed concerns identified by the staff as outlined in the staff's 1/8/92 safety evaluation pertaining to the third 10-year interval Inservice Pump and Valve Testing Program. This subtopic has not been tracked through ISAP, but through the NRC's review of the Unit 1 IST Program.
- Therefore, the NRC agrees that these topics can be closed out in ISAP.
- 1.106 Station Blackout
- In the NRC SEs dated 8/29/90 and 7/2/91, the staff response and commitments regarding SBO acceptable. In a letter dated 8/6/92, NNECO informed the staff that the cycle 14 outage would be delayed until early 1994. By letter dated 8/25/92 the staff approved this revised schedule. In the ISAP update dated 6/30/94, NNECO stated that the modifications had been completed and that the SBO issue for Unit 1 should be closed out. The NRC agrees that this topic can be closed.
- 1.113 Hardened Wetwell Vent, GL 89-16
- This project involves installation of a hardened wetwell vent. In a meeting with the NRC staff on 4/22/93, NNECO presented an alternative design for the hardened vent. Due to the need to complete the associated engineering design, the original schedule was changed. However, the installation was still scheduled for the cycle 14 refueling outage. In the 6/30/94 ISAP update, NNECO stated that the installation of the hardened vent was complete, therefore, this topic could be closed. The NRC agrees that this topic can be closed. The staff will be reviewing the installation and design in a future inspection.

- 1.118 Plant Heating Steam System
This topic involves the modifications necessary for restoration of the heating steam system. In May 1990, NNECO identified that certain postulated house heating steam pipe breaks could result in degradation of areas of the plant previously considered to be environmental qualification mild environments. In the 1/24/92 ISAP update, NNECO stated that a majority of the planned modifications were completed and the remainder were to be completed at a later date. In the 3/23/94 ISAP update, NNECO stated that an assessment of the relative merit of completing the last phase of this project and, therefore, that this topic be closed. Based on NNECO's conclusion that adequate means are available to assure safe shutdown of the plant in the event of a high energy line break (HELB), the staff agrees that this topic can be closed. Further NRC review of the Unit 1 HELB program, if any, will be performed by inspection or audit.
- 1.120 Purge and Vent Valve Auto-Closure
This topic involves providing a new isolation input signal to the purge and vent system valves for the primary containment on high radiation. NNECO has committed to do this modification during the cycle 14 refueling outage. In the 6/30/94 ISAP update, NNECO stated that the modifications had been completed, therefore this topic could be closed. The NRC agrees that this topic can be closed out.
- 1.121 Post Accident Hydrogen Monitor
This topic had previously been discussed under topic 1.11. In a letter dated 6/10/92, NNECO submitted its reevaluation for this issue. NNECO maintained that no modifications are warranted and that this topic should be closed. The NRC staff reviewed this issue and, in a letter dated 9/7/93, accepted NNECO's position. Therefore, the NRC agrees that this topic can be closed out.
- 1.124 MSIV ASCO Solenoid Valve Replacement
In September 1989, the NRC notified licensees of a potential common mode failure with ASCO dual-coil solenoid valves that could impact main steam isolation valve operability. The existing qualified life of the solenoid valves is July 1994. The proposed project was to replace the solenoid valves thus maintaining their compliance with 10 CFR 50.49. NNECO scheduled the modifications for the cycle 14 refueling outage. In the 6/30/94 ISAP update, NNECO stated that the valves were replaced and the topic could be closed. The NRC agrees that this topic can be closed.

1.125

TBSCCW Heat Exchanger Upgrade

NNECO analysis has concluded that the selected turbine building secondary closed cooling water (TBSCCW) system heat exchanger is operating at approximately twice the shell side design flow. This has been the normal system alignment for many years, and no indication of tube damage has been detected. An evaluation concluded that the heat exchangers are operable. However, in the 3/23/94 ISAP update, NNECO stated that it would make modifications to the system to eliminate the concern during the cycle 14 outage. In the 6/30/94 ISAP update, NNECO stated that the modifications had been completed and that the system is operating in accordance with its design parameters. Therefore, NNECO considered this topic closed. The NRC agrees that this topic can be closed.

2.06

Condenser Retube

This topic addressed the replacement of the existing 70/30 copper-nickel condenser tubes with titanium tubes. The retubing was scheduled for the cycle 14 refueling outage. In the 6/30/94 ISAP update, NNECO stated that this project was completed and this topic could be closed. The staff concurs that this topic can be closed.

2.116

Replacement of CU-28 Motor Operator

This topic originally involved the replacement of valve CU-2 and its motor-operator, and the installation of a motor operated valve (MOV) in the reactor water cleanup inlet piping immediately outside the drywell. The necessary vent and drain connections for Appendix J testing was also to be installed. In the 6/18/93 ISAP update, NNECO stated that following an improvement in maintenance activities associated with these valves and subsequent satisfactory local leak rate testing results, a reassessment of the need to replace this valve was performed. The reassessment concluded that the modifications were not necessary and won't be completed. However, as discussed in the 10/23/93 ISAP update, NNECO determined that replacement of the CU-28 motor operator and cabling could be incorporated into this topic. The title was changed to reflect this. The modifications for CU-28 were scheduled for the cycle 14 refueling outage. In the 6/30/94 ISAP update, NNECO stated that the modifications were completed and this topic could be closed. The staff concurs that this topic can be closed. All MOV related modifications may be reviewed as part of the overall NRC inspection of GL 89-10 implementation.

- 2.120 Atmospheric Control System Containment Isolation Valves This topic addressed a engineering study which considered possible modifications to existing valves or the procurement of new valves to mitigate high valve failure during local leak rate testing. Some modifications have been completed and NNECO submitted a corrective action plan which addressed future modifications. The remaining modifications were scheduled to be completed during the cycle 14 outage. In the 6/30/94 ISAP update, NNECO stated that the modifications had been completed and that this topic could be closed. The NRC concurs that this topic can be closed.
- 2.124 Replacement of IC System Valves In response to GL 89-10, "Safety-Related Motor-Operated Valve Testing and Surveillance" and a subsequent evaluation, NNECO performed an engineering evaluation to demonstrate with reasonable assurance, that safety-related MOVs would operate as intended. The evaluation concluded that all safety-related MOVs (including IC-1,2,3, and 4) will operate as required. Subsequent to a recent reassessment, NNECO determined that modifications to IC-1,2, and 3 are not necessary and will not be completed. However, in order to increase the reliability and repeatability of IC-4, NNECO proposed to replace the motor operator and associated cables and that this would be completed during the cycle 14 outage. In the 6/30/94 ISAP update, NNECO stated that this modification had been completed and that this topic could be closed. The NRC concurs that this topic can be closed.
- 2.126 Emergency Service Water/ Service Water Headers The emergency service water (ESW) and service water (SW) pump discharge piping in the intake structure were experiencing external corrosion due to salt water exposure. The proposed project was to redesign and replace the ESW and SW pump discharge headers. The modifications were scheduled for the cycle 14 refueling outage. In the 6/30/94 ISAP update, NNECO stated that the modifications were completed and that this topic can be closed. The NRC concurs that this topic can be closed.
- 2.128 Low Pressure A Turbine Rotor Replacement Keyway cracking in the A low pressure (LP) turbine rotor progressed to the extent that inservice inspections of the rotor would have had to be performed more frequently than every refueling outage. The proposed project was to replace the shrunk-on disc type A LP rotor with a solid monoblock rotor. The project was scheduled for the cycle 14 refueling outage. In the 6/30/94 ISAP update, NNECO stated that this replacement was completed and that this topic could be closed. The NRC concurs that this topic can be closed.

2.129

LPCI Check Valve
Replacement

This topic addressed the replacement of LPCI check valves which were not reseating properly. The initial scope of the topic was to replace 2 check valves (LP-3B/C), but further review determined that all 4 check valves should be replaced. In the 6/30/94 ISAP update, NNECO stated that this project was completed and that this topic could be closed. The NRC concurs that this topic can be closed.