



LONG ISLAND LIGHTING COMPANY

SHOREHAM NUCLEAR POWER STATION

P.O. BOX 618, NORTH COUNTRY ROAD • WADING RIVER, N.Y. 11792

JOHN D. LEONARD, JR.
VICE PRESIDENT - NUCLEAR OPERATIONS

October 11, 1984

SNRC-1091

Mr. Thomas F. Martin, Director
Division of Engineering and Technical Programs
U.S. Nuclear Regulatory Commission - Region I
631 Park Avenue
King of Prussia, PA 19406

NRC Inspection of July 23 - 26, 1984
Shoreham Nuclear Power Station - Unit 1
Report No. 50-322/84-31

Dear Mr. Martin:

In accordance with Title 10CFR Part 2, Appendix C, Attachment 1 of this letter provides LILCO's response to the Notice of Deviation contained in Appendix A of your letter dated September 12, 1984, which forwarded the results of routine inspection 50-322/84-31.

Our response includes (1) the corrective steps which have been taken and the results achieved; (2) the corrective steps taken to prevent recurrence of similar deviations; and (3) the date when full compliance is expected to be achieved.

While we anticipate that you will find this response acceptable, please do not hesitate to call my office should you require further information or clarification regarding our reply.

Very truly yours,

Jeffrey L. Smith for
John D. Leonard, Jr.

Vice President - Nuclear Operations

TD:ck

Attachment

cc: P. Eselgroth
C. Petrone

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PDR ADOCK 05000322
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AFFIDAVIT

STATE OF NEW YORK)

: SS.:

COUNTY OF SUFFOLK)

JEFFREY L. SMITH, being duly sworn, deposes and says that I am the Manager, Nuclear Operations Support Department for Long Island Lighting Company, the owner of the Shoreham Nuclear Power Station. I have read the Notice of Deviation dated September 12, 1984, and also the response thereto dated October 11, 1984, prepared under my direction. The facts set forth in said response are based upon reports and information provided to me by the employees, agents, and representative of Long Island Lighting Company responsible for the activities described in said Notice of Deviation and in said response. I believe the facts set forth in said responses are true.

Jeffrey L. Smith
Jeffrey L. Smith

Sworn to before me this
12 day of October 1984

Connie Maria Pardo

CONNIE-MARIA PARDO
NOTARY PUBLIC, State of New York
No. 52-46158-10
Qualified in Suffolk County
Commission Expires March 30, 1985

ATTACHMENT I
Response to Notice of Deviation

Deviation

Final Safety Analysis Report (FSAR) Chapter 14, "Initial Tests and Operations" states the following:

- 14.1.4.8.12 RCIC System Startup Test Acceptance Criteria (Level 1)
"3. The RCIC turbine must not trip off during the startup."
- 14.1.4.8.13 HPCI System Startup Test Acceptance Criteria (Level 2)
"1. The turbine gland seal condenser system shall be capable of preventing steam leakage to the atmosphere in excess of allowable releases."
- Table 14.1.1-1 item 14.1.4.8.13, HPCI System Startup Test, specifies the test be done during plant heatup, Test Condition (TC)-2 and TC-6.

Contrary to the above it was identified that certain startup test procedures did not conform to the above FSAR commitments as follows:

- STP-14, RCIC System, level (1) acceptance criteria restricted the turbine trip to overspeed trip only, rather than any RCIC trip, regardless of cause.
- STP-15 HPCI System, does not provide for performing a HPCI system test at TC-6 and for the identification of turbine steam leakage during testing.

Response

- (1) Corrective steps taken and results achieved:

Startup Test Procedures (STPs) 14 and 15 have been revised to agree with sections 14.1.4.8.12 and 14.1.4.8.13 of the Final Safety Analysis Report (FSAR), Revision 33 - September, 1984. The requirement to test HPCI at TC-6, as stated in the FSAR, was incorrect. Revision 33 - September 1984, of the FSAR deletes this requirement.

- (2) Corrective steps taken to prevent recurrence of similar deviations.

We performed a detailed review of Chapter 14 and the associated STPs, in order to ensure that similar deviations do not exist in other STPs. As a result of this review STPs 14 and 15 were revised (see (1) above) along with various sections of Chapter 14 (via revision 33 of the FSAR) which was revised to comply with the most recent General Electric Startup Test Specification.

(3) The date when full compliance will be achieved:

Chapter 14 was revised (Revision 33 of the FSAR) and issued on September 28, 1984. Startup Test Procedures 14 and 15 have been revised and approved by the Review of Operations Committee (ROC). Based on the above, full compliance has been achieved.