



LONG ISLAND LIGHTING COMPANY

175 EAST OLD COUNTRY ROAD · HICKSVILLE, NEW YORK 11801

*File in IR Book w/ 84-01 EP 3/15
Peterson*

if not already there

MILLARD S. POLLOCK
VICE PRESIDENT - NUCLEAR

January 13, 1984

Dr. Thomas E. Murley
Regional Administrator
Region I
Nuclear Regulatory Commission
631 Park Ave.
King of Prussia, PA 19406

Dear Dr. Murley:

Pursuant to our earlier brief discussion relative to the recent diesel generator rocker arm incident, I am forwarding a copy of my directive and associated procedure that is aimed at additionally tightening an already comprehensive engine reassembly program.

As we had discussed, a full specific recheck of the rocker arm reassembly and detailed review of the reassembly exceptions was made on all three engines before operational testing was allowed to continue.

I am personally satisfied that design inadequacy is not involved and that the comprehensive preoperational test program to follow reassembly will, as it is designed, shake out any remaining inadequacies and fully prove the reliability of these engines. I am also confident that the additional surveillance being applied as outlined in the attached will properly address the root cause of the engine reassembly incident in question.

I won't belabor additional steps that have been initiated by E. J. Youngling and his organization other than to say all aspects of the reassembly process have undergone a stringent review with appropriate revisions made to strengthen the process.

Although these steps have been taken to address this specific incident, I am continuing my assessment of the process to assure myself that where generic process issues are involved, appropriate corrective measures will be taken in all responsible organizations.

PJ/8

84-08

Dr. Thomas E. Murley
January 13, 1984
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Your staff, I'm sure, has or will shortly submit their position on this incident and I look forward to further discussion with you to be sure any differences are appropriately resolved.

Sincerely,

M. S. Pollock

M. S. Pollock
Vice President-Nuclear

Attach. (2)

January 10, 1984

TO: R. A. Kubinak, Chairman Nuclear Review Board

SUBJECT: Office of Nuclear - Executive Directive 84-01

ISEG Independent Review of Emergency Diesel
Generator Recovery Preoperational Testing

Effective the first shift, January 9, 1984, ISEG is directed to provide around-the-clock on-shift coverage of Preoperational Testing for the Emergency Diesel Generators. The purpose of the ISEG coverage is to provide an independent technical review of the performance of preoperational testing associated with the emergency diesel generator recovery program. The review is to assure that testing is performed in accordance with the approved procedures and that any exceptions or changes to the approved procedures are technically adequate and processed in accordance with the Startup Manual.

ISEG personnel assigned to on-shift coverage may be LILCO or consultant personnel but are to be appropriately qualified through training and/or experience to provide a meaningful technical review. ISEG personnel may request stop-work directive from the Chairman, NRB provided that a technical question arises which cannot be addressed to the satisfaction of ISEG following suitable consultation with Startup.

It is recognized that this assignment is somewhat outside of the scope of normal ISEG activities as defined in the ISEG Charter. By this Directive, ISEG involvement is authorized as a special surveillance project. The ISEG Charter and the associated procedures are to remain effective and are to govern ISEG involvement with this project. Weekly reports of the activities of the ISEG in this project are to be submitted to the Chairman, Nuclear Review Board, the Director of the Office of Nuclear, and Startup Manager.

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By copy of this directive, Mr. E. J. Youngling shall give appropriate direction to Startup personnel to assure full cooperation with this Directive and specifically the on-shift ISEG personnel.

M. S. Pollock

M. S. Pollock
Vice President-Nuclear

cc: Messrs. W. E. Steiger
E. J. Youngling
W. J. Museler
B. R. McCaffrey
J. L. Smith
T. F. Gerecke
D. J. Binder
J. F. Alexander

File

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January 11, 1984

M.S. Pollock

Executive Directive 84-01: ISEG Independent Review of Emergency Diesel Generator Recovery Preoperational Testing

In accordance with the requirements of the subject directive, a workscope and an organizational structure have been developed to perform an evaluation of the Preoperational Test Program. The attached ISEG Project Plan constitutes the proposed Nuclear Review Board program to execute Executive Directive 84-01.

R.A. Kubinak

R.A. Kubinak
Chairman, Nuclear Review Board

JFA/ns

Approved
 Returned, unapproved

M.S. Pollock 1-12-84
M.S. Pollock Date

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INDEPENDENT SAFETY ENGINEERING GROUP

PROJECT PLAN

PROJECT TITLE

ISEG Independent Review of Emergency Diesel Generator Recovery Preoperational Testing.

ISEG-84-001

This project is developed to implement Executive Directive 84-01, "ISEG Independent Review of Emergency Diesel Generator Recovery Preoperational Testing".

PROJECT PURPOSE

The purpose of this project is to provide an independent technical review of preoperational testing associated with the emergency diesel generator. This review is to provide assurances that:

- 1) testing as performed in the field is in accordance with the approved preoperational test, and/or;
- 2) any exception taken from, or change made to, the approved procedures are technically sound and administratively adequate.

WORKSCOPE

A) General

Effective the first shift, January 7, 1984, ISEG will maintain two personnel on-shift to review and to examine the preoperational testing of the emergency diesel generators. The personnel are to be available 24 hours a day, 7 days a week.

B) Responsibility

The assigned ISEG personnel will perform at a minimum the following duties:

- (1) Witness/observe engine evolutions to assure that each evolution is performed in accordance with procedure and that adequate quality and administrative control as prescribed by the LIU'CO Startup Manual is in effect.
- (2) Attend formal meetings associated with the emergency diesel generators.
- (3) Review documents which relate to emergency diesel generators testing for technical accuracy and compliance with administrative procedures.
- (4) Review and document the bases for any exceptions or changes to approved procedures using an approved form. The completed form is to be reviewed by the ISEG Supervisor.
- (5) Maintain a continuous chronological log of the on-shift activities of ISEG personnel.

C) Authority

The Chairman, Nuclear Review Board, may exercise stop-work authority under the following conditions:

- (1) The responsible Startup Test Engineer has been informed and cannot address the concern to the satisfaction of the ISEG Engineer, on-shift, and
- (2) The ISEG Chairman, Supervisor and Startup Manager are unable to resolve a significant dispute in a timely manner, and
- (3) A violation of approved applicable procedures has occurred which may affect the quality of the preoperational testing results or the ability of the emergency diesel generators to perform their design function, and/or
- (4) A technical error/ommission has occurred which may affect the quality of the preoperational testing results or the ability of the emergency generator to perform their design function.

Stop-work authority is provided with the intentions that it be experienced only when necessary to prevent a violation of procedure, or regulation as to preserve the physical and/or the quality assurance integrity of the emergency diesel generator. Individual ISEG Engineers are urged to maintain a cordial, though independent, liaison with Startup personnel and to make positive recommendations to Startup so as to minimize the need to implement stop-work authority.

D) Work Practices

The work practices prescribed in the ISEG procedures are to be followed in the performance of this project. ISEG involvement with the EDG's is to be maintained at the working level. Personnel are to be actively involved with the testing and are to maintain an independent but working relationship with the test personnel.

ISEG involvement with EDG testing is to be broad in scope and may focus on any issues which may affect the performance, reliability, or the quality of the system. Certain features are to be the subject of special attention and include:

- (1) Proper technical and administrative disposition of test exceptions.
- (2) Proper interpretation of test results to assure that engine/system test performance satisfies the acceptance criteria.
- (3) Proper use and control of approved test equipment.
- (4) Proper administrative controls to assure quality.

REFERENCES

Office of Nuclear - Executive Directive 84-01, "ISEG Independent Review of Emergency Diesel Generator Recovery Preoperational Testing."

SCHEDULE

Not applicable.

ADMINISTRATIVE CONTROLS

The approved procedures of the Nuclear Review Board, the Independent Safety Engineering Group, and the LILCO Quality Assurance Department are to apply to the conduct of this project.