



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 1, 1984

SNRC-1088

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Shoreham Technical Specifications
Shoreham Nuclear Power Station - Unit 1
Docket No. 50-322

- Reference: (1) Letter NRC (A. Schwencer) to LILCO (J. D. Leonard)
dated 9/14/84
(2) Letter SNRC-1078 dated 9/5/84

Dear Mr. Denton:

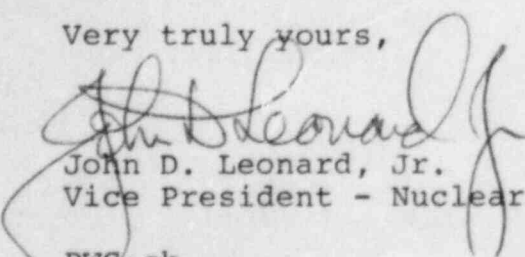
In response to the Reference (1) letter, the Long Island Lighting Company has reviewed the final draft of the Shoreham Technical Specifications as transmitted by the Reference (1) letter. LILCO certifies that, allowing for the changes noted on the attached pages, these Technical Specifications, to the best of our knowledge, accurately reflect the plant, the FSAR, and other documentation, and the SER analyses.

The attached pages (pages 6-1, 6-6, 6-8, 6-9, 6-11, 6-12, 6-19) require revision to reflect organizational changes recently docketed via the Reference 2 letter. A bar has been placed in the right hand margin to facilitate identification of these changes.

In addition, certain specific aspects of the Technical Specifications, such as emergency diesel generators, have been the subject of discussions with members of your staff and may require revision during the course of final licensing.

Should you have any questions, please contact this office.

Very truly yours,


John D. Leonard, Jr.
Vice President - Nuclear Operations

RWG:ck

cc: P. Eselgrot.
C. Petrone

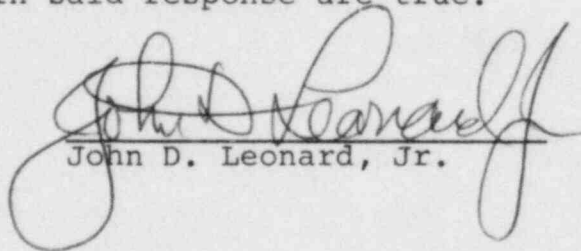
8410040426 841001
PDR ADDCK 05000322
A PDR

Boo!
||

AFFIDAVIT

STATE OF NEW YORK)
 : ss:
COUNTY OF SUFFOLK)

JOHN D. LEONARD, JR., being duly sworn, deposes and says I am the Vice President, Nuclear Operations for the Long Island Lighting Company. I have read this response which was prepared under my direction and dated October 1, 1984. The facts set forth in this response are based upon reports and information provided to me by the employees, agents and representatives of Long Island Lighting Company responsible for these activities. I believe the facts set forth in said response are true.


John D. Leonard, Jr.

Sworn to before me this
1 day of October 1984

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

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Plant Manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The Watch Engineer (or during his absence from the control room, a designated individual) shall be responsible for the Control Room command function. A management directive to this effect, signed by the Vice President-Nuclear shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

CORPORATE-NUCLEAR

6.2.1 The Corporate-Nuclear organization for station management and technical support shall be as shown on Figure 6.2.1-1.

UNIT STAFF

6.2.2 The station organization shall be as shown on Figure 6.2.2-1 and:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2.2-1;
- b. At least one licensed Reactor Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in OPERATIONAL CONDITION 1, 2 or 3, at least one licensed Senior Reactor Operator shall be in the control room;
- c. A Health Physics Technician* shall be on site when fuel is in the reactor;
- d. All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Reactor Operator or licensed Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation;
- e. A site fire brigade of at least five members shall be maintained on site at all times*. The fire brigade shall not include the Watch Engineer, the Shift Technical Advisor, nor the two other members of the minimum shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency; and

*The Health Physics Technician and fire brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions.

ADMINISTRATIVE CONTROLS

6.2.3 INDEPENDENT SAFETY ENGINEERING GROUP (ISEG)

FUNCTION

6.2.3.1 The ISEG shall function to examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of unit design and operating experience information, including units of similar design, which may indicate areas for improving unit safety. The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities or other means of improving unit safety to the ~~Manager of Nuclear Operations Support Department.~~

Director, Quality Assurance, Safety and Compliance.

COMPOSITION

6.2.3.2 The ISEG shall be composed of at least five, dedicated, multi-disciplined, full-time engineers located on site. Each shall have a bachelor's degree in engineering or related science, or equivalent, and at least 2 years professional experience in his field, at least 1 year of which experience shall be in the nuclear field.

RESPONSIBILITIES

6.2.3.3 The ISEG shall be responsible for maintaining surveillance of unit activities to provide independent verification* that these activities are performed correctly and that human errors are reduced as much as practical.

RECORDS

6.2.3.4 Records of activities performed by the ISEG shall be prepared, maintained, and forwarded each calendar month to the ~~Manager of Nuclear Operations Support Department.~~

Director, Quality Assurance, Safety and Compliance

6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall provide advisory technical support to the Watch Engineer in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to safe operation of the unit. The Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline and shall have received specific training in the response and analysis of the unit for transients and accidents, and in unit design and layout, including the capabilities of instrumentation and controls in the control room.

6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees, except for the Health Physics Supervisor who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975. The licensed Operators and Senior Operators shall also meet or exceed the minimum qualifications of the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees.

* Not responsible for sign-off function.

ADMINISTRATIVE CONTROLS

RESPONSIBILITIES

6.5.1.6 The ROC shall be responsible for:

- a. Review of (1) all proposed procedures required by Specification 6.8 and changes thereto, (2) all proposed programs required by Specification 6.8 and changes thereto, and (3) any other proposed procedures or changes thereto as determined by the Plant Manager to affect nuclear safety;
- b. Review of all proposed tests and experiments that affect nuclear safety;
- c. Review of all proposed changes to Appendix A Technical Specifications;
- d. Review of all proposed changes or modifications to unit systems or equipment that affect nuclear safety;
- e. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, to the Vice President-Nuclear and to the Nuclear Review Board;
- f. Review of all ^{Operations} REPORTABLE EVENTS;
- g. Review of station operations to detect potential hazards to nuclear safety;
- h. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Plant Manager or the Nuclear Review Board;
- i. Review of the Security Plan and implementing procedures and submittal of recommended changes to the Nuclear Review Board;
- j. Review of the Emergency Plan and implementing procedures and submittal of recommended changes to the Nuclear Review Board;
- k. Review of the proposed changes to the Process Control Program (PCP);
- l. Review of the proposed changes to the Offsite Dose Calculation Manual (ODCM);
- m. Review of the proposed Major Changes to Radioactive Waste Systems;
- n. Review of Personnel Radiation Records annually to determine how exposures might be lowered consistent with ALARA principles. Document such considerations; and
- o. Review of any accidental, unplanned, or uncontrolled radioactive release including the preparation of reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Vice President-Nuclear and to the Nuclear Review Board.

6.5.1.7 The ROC shall:

- a. Recommend in writing to the Plant Manager approval or disapproval of items considered under Specification 6.5.1.6a. through d. k. and m. prior to their implementation.
- b. Render determinations in writing with regard to whether or not each item considered under Specification 6.5.1.6a. through e. above constitutes an unreviewed safety question.

ADMINISTRATIVE CONTROLS

FINAL DRAFT

RESPONSIBILITIES (Continued)

- c. Provide written notification within 24 hours to the Vice President-Nuclear^{Operations} and the Nuclear Review Board of disagreement between the ROC and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1.

RECORDS

6.5.1.8 The ROC shall maintain written minutes of each ROC meeting that, at a minimum, document the results of all ROC activities performed under the responsibility provisions of these Technical Specifications. Copies shall be provided to the Vice President-Nuclear^{Operations} and the Nuclear Review Board.

6.5.2 NUCLEAR REVIEW BOARD (NRB)

FUNCTION

6.5.2.1 The NRB shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear power plant operations,
- b. Nuclear engineering,
- c. Chemistry and radiochemistry,
- d. Metallurgy,
- e. Instrumentation and control,
- f. Radiological safety,
- g. Mechanical and electrical engineering, and
- h. Quality assurance practices.

The NRB shall report to and advise the^{Executive} Vice President² Nuclear on those areas of responsibility in Specifications 6.5.2.7 and 6.5.2.8.

COMPOSITION

6.5.2.2 The NRB shall be composed of the permanent NRB Chairman and a minimum of five permanent NRB members. The chairman and all members of the NRB shall have qualifications that meet the requirements of Section 4.7 of ANSI/ANS 3.1-1978.

The membership shall include at least one individual from outside LILCO's or its contractors' organizations and at least one individual with substantial BWR operating experience. The BWR operating experience may be provided by the individual who is from outside LILCO's or its contractors' organizations.

ALTERNATES

6.5.2.3 All alternate members shall be appointed in writing by the NRB Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in NRB activities at any one time.

AUDITS

6.5.2.8 Audits of station activities shall be performed under the cognizance of the NRB. These audits shall encompass:

- a. The conformance of station operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months;
- b. The performance, training and qualifications of the entire station staff at least once per 12 months;
- c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems, or method of operation that affect nuclear safety, at least once per 6 months;
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50, at least once per 24 months;
- e. The fire protection programmatic controls including the implementing procedures at least once per 24 months by qualified licensee QA personnel;
- f. The fire protection equipment and program implementation at least once per 12 months utilizing either a qualified offsite licensee fire protection engineer(s) or an outside independent fire protection consultant. An outside independent fire protection consultant shall be utilized at least every third year;
- g. Any other area of station operation considered appropriate by the NRB, ^{or the Vice President-Nuclear Operations;}
- h. The ^{Executive Vice President} radiological environmental monitoring program and the results thereof at least once per 12 months;
- i. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months; and
- j. The PROCESS CONTROL PROGRAM and implementing procedures for solidification of radioactive wastes at least once per 24 months.
- k. The performance of activities required by the Quality Assurance Program for effluent and environmental monitoring at least once per 12 months.

RECORDS

6.5.2.9 Records of NRB activities shall be prepared, approved, and distributed as indicated below:

- a. Minutes of each NRB meeting shall be prepared, approved, and forwarded to the ^{Operations} Vice President-Nuclear within 14 days following each meeting. ^{Executive Vice President and the}
- b. Reports of reviews encompassed by Specification 6.5.2.7 shall be prepared, approved, and forwarded to the ^{Operations} Vice President-Nuclear within 14 days following completion of the review.

Executive Vice President and the

ADMINISTRATIVE CONTROLS

FINAL DRAFT

RECORDS (Continued)

Executive

Vice President - Nuclear Operations

- c. Audit reports encompassed by Specification 6.5.2.8 shall be forwarded to the ~~Vice President Nuclear~~ *Executive* and to the management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the ROC, and the results of this review shall be submitted to the NRB and the Vice President-Nuclear *Operations*

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Vice President-Nuclear *Operations* and the NRB shall be notified within 24 hours.
- b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the ROC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon unit components, systems, or structures, and (3) corrective action taken to prevent recurrence.
- c. The Safety Limit Violation Report shall be submitted to the Commission, the NRB, and the Vice President-Nuclear *Operations* within 14 days of the violation.
- d. Critical operation of the unit shall not be resumed until authorized by the Commission.

RECORD RETENTION (Continued)

- b. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories.
- c. Records of radiation exposure for all individuals entering radiation control areas.
- d. Records of gaseous and liquid radioactive material released to the environs.
- e. Records of transient or operational cycles for those unit components identified in Table 5.7.1-1.
- f. Records of reactor tests and experiments.
- g. Records of training and qualification for current members of the unit staff.
- h. Records of inservice inspections performed pursuant to these Technical Specifications.
- i. Records of quality assurance activities required by the Operational Quality Assurance Manual.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of meetings of the ROC and the NRB.
- l. Records of the service lives of all hydraulic and mechanical snubbers required by Specification 3.7.5 including the date at which the service life commences and associated installation and maintenance records.
- m. Records of analyses required by the radiological environmental monitoring program that would permit evaluation of the accuracy of the analysis at a later date. This should include procedures effective at specified times and QA records showing that these procedures were followed.

6.11 RADIATION PROTECTION PROGRAM

6.11.1 Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure.