Docket File UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555 July 9, 1992 Docket No. 50-322 Mr. Leslie Hili Resident Manager Long Island Power Authority Shoreham Nuclear Power Station Post Office Box 628 North Col try Road Wading Riv New York 11792 Dear Mr. Hill: SUBJECT: CHANGE - WET CUTTING STATION DESIGN We have reviewed your letter LSNRC-1971 dated June 29, 1992, .nat provided additional information supporting changes to the Wet Cutting Station (WCS) design, and the addition of Water Processing Systems (WPS) for use inside the Reactor Pressure Vessel (RPV), and under the RPV. We have also reviewed your letter LSNRC-1968 dated June 19, 1992, that transmitted the LIPA Site Review Committee's (SRC) safety evaluation. The changes described represent a significant departure from the operating methods and design as described for the decommissioning plan. However, our review of the submerged filtration systems for use in the RPV and WCS show that these filtration systems can be operated safely within the bounds of the staff's evaluation as documented in the staff's Safety Evaluation Report (SER) and Environmental Assessment (EA). We also have the following comments on the process used by LIPA to evaluate these Decommissioning Plan changes: The RPV Bottom filtration unit located in the shielded vessel pedestal area beneath the RPV, incorporates the use of flexible hoses. System drawings show only one manually operated valve at the CRD flange, in each leg of this filtration unit. Neither LIPA's SRC safety evaluation, nor the "Technical Report on Water Processing and Water Management Activities for Reactor Prissure Vessel and Wet Cutting Station." addressed methods to be used to isolate the filtration unit in the event of a leak or possible hose rupture. Due to the location of the RPV Bottom filtration unit, and the approximate 72,000 gallons of contaminated water in the RPV, it is our opinion that it would be appropriate for LIPA's SRC to evaluate the impact of a leak or rupture associated with this unit and to address the maximum dose to workers in the event of a significant leak. NRC FILE CENTER COPY

The staff finds that the WC3 changes are significant when compared with the information provided in the Decommissioning Plan. The staff notes the availability of the plant's installed liquid radwaste system, and the system's ability to collect and process water released due to potential failures associated with this filtration unit. In our opinion a large leak or rupture associated with RPV Bottom filtration unit, or its hoses is bounded by the staff's safety evaluations documented in the staff's SER and EA. Thus, based on the staff's evaluation, the WCS changes can be made and the filtration units can be operated without having a significant impact on public health and safety.

The staff recommends that the LIPA's SRC re-evaluate this change, and ensure that it carefully reviews all future changes that could have an impact on worker ealth and safety during the decommissioning. Should you have any questions you can call Larry Bell, NMSS/LLDR at (301) 504-171.

Sincerely,
Original signed by:
Stewart W. Brown, Project Manager
Non-Power Reactors, Decommissioning and
Environmental Project Directorate
Division of Reactor Projects - III/IV/V
Office of Nuclear Reactor Regulation

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PONP:D Sweiss 07/7/92 Mr. Leslie Hill The staff finds that the WCS changes are significant when compared with the information provided in the Decommissioning Plan. The staff notes the availability of the plant's installed liquid radwaste system, and the system's ability to collect and process water released due to potential failures associated with this filtration unit. In our opinion a large leak or rupture associated with RPV Bottom filtration unit, or its hoses is bounded by the staff's safety evaluations documented in the staff's SER and EA. Thus, based on the staff's evaluation, the WCS changes can be made and the filtration units can be operated without having a ignificant impact on public health and safety. The staff recommends that the LIPA's SRC re-evaluate this change, and ensure that it carefully reviews all future changes that could have an impact on worker health and safety during the decommissioning. Should you have any questions you can cail Larry Bell, NMSS/LLDR at (301) 504-2171. Sincerely, Towart W. Eron Stewart W. Brown, Project Manager Non Power Reactors, Decommissioning and Environmental Project Directorate Division of Reactor Projects - III/IV/V Office of Nuclear Reactor Regulation cc: See next page

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