

APR 23 1984

MEMORANDUM FOR: Gary M. Holahan, Chief
Operating Reactors Assessment Branch, DL

THRU: John A. Zwolinski, Section Leader
Operating Reactors Assessment Branch, DL

FROM: Paulette P. Tremblay, Project Manager
Operating Reactors Assessment Branch, DL

SUBJECT: MONTHLY STATUS REPORT ON PLANT-SPECIFIC
BACKFITTING ACTIVITIES

Enclosed are tables reflecting the status of plant-specific backfitting activities for operating reactors and license applicants through the month of April 1984. Tables 1 and 2 track each issue with respect to time through the backfitting appeal system; Table 3 provides a brief summary of these issues.

A few changes have occurred since last month's status report. Two issues pending for Shoreham have been closed-out and the Region will follow implementation. Also, the issue concerning Davis Besse has been resolved by the licensee agreeing with the NRC position. Four new issues have been identified and included in the tracking system; two for Kewanee and two for Turkey Point 3/4.

(5)
Paulette Tremblay, Project Manager
Operating Reactors Assessment Branch
Division of Licensing

Enclosures:
As stated

cc w/enclosures:
D. Eisenhut
F. Miraglia
G. Lainas
T. Novak

DISTRIBUTION
Central File

JZwolinski
PTremblay

8406460030

TABLE 1
STATUS OF PLANT-SPECIFIC APPEALING REQUIREMENTS
FOR OPS

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)
ID #	IDENTIFICATION	CORRESPONDENCE	FIRST LEVEL APPEAL REQUESTED	AD MEETING MINUTES	AD MEETING MINUTES	AD POSITION	LICENSEE RESPONSE	SECOND LEVEL APPEAL REQUESTED	AD MEETING MINUTES	AD POSITION	LICENSEE RESPONSE	THIRD LEVEL APPEAL REQUESTED	VALUE IMPACT ANALYSIS	AD DECISION	LICENSEE RESPONSE	OR TIME DISPOSED	
SA-83-1	5-11/83	L-12/83 S-1/84															
SA-83-2	5-1/82	L-8/83 S-9/83															
OR-83-3	5-9/83	L-11/83 L-5/84	L-11/7/83 (I) V-4/30/84 (C)														
OR-83-4	5-11/83	L-1/84	N														1/20/84
OR-83-5	5-10/83		N														10/28/83
L-83-6	(See Table 2)																
L-83-7	(See Table 2)																
L-83-8	5-1/83		N														11/22/83

LEGEND

(1) Plant name and issues
 (2) L-license initially identified issue and date
 (3) S-Staff initially identified issue and date
 (4) If staff initiates issue, correspondence begins with staff position to licensee and ends with (4) Appeal
 (5) I-date of appeal by licensee
 (6) Y-date of proposed appeals meeting
 (7) N-no appeal; issued resolved
 (8) Date of actual appeals meeting with AD
 (9) Date of issuance of meeting minutes (w/in 2 wks of meeting)
 (10) Date of AD position after meeting
 (11) Date of licensee response to outcome of appeals meeting
 (12) L-date of appeal by licensee
 (13) Y-date of proposed appeals meeting
 (14) N-no appeal; issue resolved
 (15) Date of appeals meeting with division director
 (16) Date of issuance of meeting minutes
 (17) Date of AD position after meeting

TABLE 1
STATUS OF PLANT-SPECIFIC BREATHING REQUIREMENTS
FOR ODS

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)
ID #	IDENTIFICATION	CORRESPONDENCE	FIRST LEVEL APPEAL REQUESTED	AD MEETING	MEETING MINUTES	AD POSITION	LICENSEE RESPONSE	SECOND LEVEL APPEAL REQUESTED	DO MEETING	MEETING MINUTES	DO POSITION	LICENSEE RESPONSE	THIRD LEVEL APPEAL REQUESTED	VALUE IMPACT ANALYSIS	DO DECISION	LICENSEE RESPONSE	ULTIMATE DISPOSITION
L-83-9	(See Table 2)																
L-83-10	(See Table 2)																
L-83-11	(See Table 2)																
OR-83-12	1-10/82	5-12/82		3/23/83	4/29/83	4/29/83		5/31/83	8/16/83	8/30/83	9/12/83	10/6/83	N				1-1/11/84 5-1/27/84
L-84-1	5-11/83 LaSalle 1/2 App. B	L-1/84	L-1/27/84	3/28/84	4/24/84	3/28/84											
L-84-2	5-11/83 LaSalle 1/2 App. B	L-1/84	L-1/27/84	3/28/84	4/24/84	3/28/84											
L-84-3	5-11/83 LaSalle 1/2 App. B	L-1/84	L-1/27/84	3/28/84	4/24/84	3/28/84											
L-84-4	5-11/83 LaSalle 1/2 App. B	L-1/84	L-1/27/84	3/28/84	4/24/84	3/28/84											
OR-84-5	5-8/82 Davis- Besse AFMS	L-6/83 S-8/83 S-2/84 L-5/84	L-3/23/83 (C)														1-5/10/84
OR-84-6	5-5/83 Tur Pt 3/4 Phys. Sec.	S-3/84															
OR-84-7	5-5/83 Tur Pt 3/4 Phys. Sec.	S-3/84															
OR-84-8	5-3/82 Fevaunee D. Neighbors	S-4/84															
OR-84-9	5-1/82 Fevaunee D. Neighbors	S-4/84															

(1) (2) (3) (4) (5) (6) (7) (8) (9) (10) (11) (12) (13) (14) (15) (16) (17) (18)

TABLE 2
STATUS OF PLANT-SPECIFIC BACKSLIDING REQUIREMENTS
FOR CP/MS

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)
PLANT SITE	IDENTIFICATION SOURCE	CORRESPONDENCE	FIRST LEVEL APPEAL REQUESTED	AD MEETING MINUTES	AD MEETING MINUTES	AD POSITION	LICENSEE RESPONSE	SECOND LEVEL APPEAL REQUESTED	AD MEETING MINUTES	AD POSITION	DO LICENSEE RESPONSE	DO POSITION	THIRD LEVEL APPEAL REQUESTED	VALUE IMPACT ANALYSIS	DO DECISION	LICENSEE RESPONSE	ULTIMATE DISPOSITION
03-6 Verde CP-R	5-7/83	1-5/83 5-7/83 1-11/83 1-2/84	Y-5/31/84														
03-7 Mile 1/2 CP-R	5-11/83	5-2/84															
03-8 Satte 1/2 CP-R	5-1/83		N														
03-9 Crestham CP-R	5-6/83	5-3/84	N														11/22/83
03-10 Crestham CP-R	5-6/83		N														5-4/84
03-11 Crestham CP-S	5-6/83	5-9/83	N														5-4/84
04-1 Mile 1/2 CP-R	5-11/83	1-1/84	1-1/27/84	3/28/84	4/24/84	3/28/84											1-4/84
04-2 Mile 1/2 CP-R	5-11/83	1-1/84	1-1/27/84	3/28/84	4/24/84	3/28/84											1-4/84
04-3 Mile 1/2 CP-R	5-11/83	1-1/84	1-1/27/84	3/28/84	4/24/84	3/28/84											3-28-84
04-4 Mile 1/2 CP-R	5-11/83	1-1/84	1-1/27/84	3/28/84	4/24/84	3/28/84											3-28-84

LEGEND
 (1) Plant name and issues
 (2) I-Licensee initially identified issue and date
 (3) S-Staff initially identified issue and date
 (4) If staff initiates issue, correspondence begins with staff position to licensee and ends with (4) Appeal
 (5) I-date of appeal by licensee
 (6) N-no appeal; issue resolved
 (7) Date of actual appeals meeting with AD
 (8) Date of issuance of meeting minutes (w/in 2 wks of meeting)
 (9) Date of AD position after meeting
 (10) Date of licensee response to outcome of appeals meeting
 (11) I-date of appeal by licensee
 (12) Y-date of proposed appeals meeting
 (13) N-no appeal; issue resolved
 (14) Date of appeals meeting with division director
 (15) Date of issuance of meeting minutes
 (16) Date of AD position after meeting

TABLE 3

SUPPLEMENT TO STATUS OF PLANT-SPECIFIC BACKFITTING ISSUES

<u>I.D.#</u> <u>Plant</u> <u>PM</u> <u>Tech. Rev. Br.</u>	<u>Issue</u>	<u>Status</u>
SA-83-1 Dresden 2 R. Gilbert CSB/DSI	Seal purge and vent valves closed. Issue raised through 11/4/83 DL letter to licensee re: MPA B-24 with SER and conclusion.	Licensee disagrees with requirement. Licensee's ltr of 12/21/83 presented justification of valve operability procedures. Licensee evaluating report on staff position (sent 3/2/84) and will present its position 5/84.
SA-83-2 Palisades T. Wambach SEP/DL	Single failure of MSIV could lead to a two steam generator blowdown for break upstream of MSIV. Resolution requires putting in isolation valve in steam line cross connect, putting in second reverse flow check valve as redundant MSIV in each steam line, or replacing present MSIVs with type that isolates flow in both directions. Issue raised 1/82 during integrated assessment for SER.	Licensee disagrees with reqmnt; will submit PRA by 9/84 justifying position. Staff accepted interim plant operation in 9/14/83 SER.
OR-83-3 Rancho Seco S. Miner ASB/DSI	Need to identify if the potential exists in AFWS for internally generated missiles. Issue identified in 9/26/83 ORB 4 letter to licensee.	Licensee sent evaluation analysis of potential for internally generated missiles 5/4/84. Decision on walkdown will be made by staff from licensee's report. The appeals meeting has been put on hold.
OR-83-4 Oconee 1/2/3 J. Suermann LOB/DHFS	Required to revise STA program to reflect all new hires into the program must have minimum qualif. (bachelor's degree or equivalent in scientific or engineering discipline) and that commercial nuclear plant operations experience is not equivalent to bachelor's degree. Issue identified in 11/28/83 ORB4 letter to licensee.	Licensee committed in 1/20/84 letter to comply with NRC requirements. <u>Issue resolved.</u>

5/18/84

TABLE 3

SUPPLEMENT TO STATUS OF PLANT-SPECIFIC BACKFITTING ISSUES

<u>I.D.#</u> <u>Plant</u> <u>PM</u> <u>Tech. Rev. Br.</u>	<u>Issue</u>	<u>Status</u>
OR-83-5 Hatch 1/2 G. Rivenbark RSB/DSI	Required to change Tech Specs to ensure operability of high water level trip and turbine bypass systems. Issue raised in 1/23/84 memo W. Butler to G. Lainas re: DSI position stated in SER.	Licensee does not concur w/NRC position. Resolution will be handled generically by DSI with CRGR. <u>Issue will not tracked further as a plant specific item.</u>
L-83-6 Palo Verde E. Licitra ASB/DSI	Applicant should provide a source range neutron flux monitor in the remote shutdown panel for direct indication of reactivity to satisfy App. R requirements. Issue identified by ASB 7/82. LB 3 informed licensee of NRR position by 7/11/82 letter.	Applicant disagrees w/ reqmnt., does not feel App. R applies to OLs. Applicant revised response February 1984. Appeal meeting scheduled for May 31, 1984.
L-83-7 Nine Mi. Pt 2 M. Haughey METB/DSI	Required to use current methodology, hydrometeorology reports 51 and 52, to determine probable maximum precipitation (PMP). This will be considered an open item in draft SER if not complied with. Issue identified by LB2 during 11/14/83 plant review. NRC discussed position with licensee 11/22/83.	Meeting w/licensee and National Weather Service was held 5/15/84. Applicant will send letter to staff on its position. It has not indicated if it will appeal.
L-83-8 LaSalle 1/2 A. Bournia ASB/DSI	Required to electrically isolate water level and temperature monitoring instruments of the suppression pool at remote shutdown panel from control room. (New interpretation of App. R). Inspection by RIII identified issue 11/14/83	Licensee committed to provide isolation of instruments by startup after first refueling after initial fuel load. <u>Issue resolved.</u>

5/18/84

TABLE 3

SUPPLEMENT TO STATUS OF PLANT-SPECIFIC BACKFITTING ISSUES

<u>I.D.#</u> <u>Plant</u> <u>PM</u> <u>Tech. Rev. Br.</u>	<u>Issue</u>	<u>Status</u>
L-83-9 Shoreham R. Caruso RPAB/DST	Required to install additional sump pumps since extreme flooding will knock out all ECCS components because of containment design. RI identified issue in 6/8/83 memo to DL.	Staff believes resolved - will send SSER #6 to RI. Issue no longer handled by DL. <u>Closed issue.</u>
L-83-10 Shoreham R. Caruso ASB/DST	Required to pipe discharge in a collection system since MSIV leakage control system discharges directly into the secondary containment atmosphere. RI identified issue in 6/8/83 memo to DL.	RI will resolve w/licensee. Issue no longer handled by DL. <u>Closed issue.</u>
L-83-11 Shoreham R. Caruso CHEB/DE	Required to provide procedure to differentiate between cladding failures and core melt including degree of each type of core damage. (This position is based on Rogovin Report, not a NUREG-0737 reqmnt.). This will become a license condition. CHEB identified issue during review 6/83.	Applicant has agreed to develop the procedure. <u>Issue resolved.</u>
OR-83-12 Farley 2 E. Reeves PSB/DSI	Licensee had requested deletion of all turbine surveillance requirements in Tech. Spec. NRC agreed provided licensee program for ensuring turbine overspeed reliability is included in Sec. 6 (Admin. Controls) of Tech Specs. Issue identified 10/8/82 when licensee proposed deleting all Tech. Specs. re: Turbine Overspeed Protection System to staff.	Licensee did not agree with requirement. Appeal meeting at DD level was held on 8/16/83. Additional correspondence and negotiations based on results of appeal mtg. produced mutually acceptable position on 1/11/84. Staff will process Tech. Spec. change. <u>Issue resolved.</u>

5/18/84

TABLE 3

SUPPLEMENT TO STATUS OF PLANT-SPECIFIC BACKFITTING ISSUES

<u>I.D.#</u> <u>Plant</u> <u>PM</u> <u>Tech. Rev. Br.</u>	<u>Issue</u>	<u>Status</u>
L-84-1 LaSalle 1/2 A. Bournia CHEB/DE	Required to apply GDC 1 to fire protection systems and equipment. Region III identified issue during readiness review meeting 11/30/83 prior to issuance of low power license.	Licensee does not believe that GDC-1 is applicable to fire protection systems and equipment. This is no longer in the active appeal process. It will be reinstated if the licensee requests further appeal.
L-84-2 LaSalle 1/2 A. Bournia CHEB/DE	Required to comply with all aspects of NFPA codes. Region III identified issue during readiness review meeting of 11/30/83 prior to issuance of low power.	Licensee has committed to identify the specific codes by number that are applicable to LaSalle. This is acceptable to the NRC staff. <u>Issue resolved (3/28/84).</u>
L-84-3 LaSalle 1/2 A. Bournia CHEB/DE	Required to perform periodic surveillance tests on fire pumps and dampers. Region III identified issue during readiness review meeting 11/30/83 prior to issuance of low power license.	Licensee will submit revised damper surveillance program. This item is no longer in the active appeal process. It will be reinstated if the licensee requests further appeal. <u>Fire pump issue is resolved.</u>
L-84-4 LaSalle 1/2 A. Bournia CHEB/DE	Required to comply with NFPA 51b training requirements for fire watches. Region III identified issue during readiness review meeting 11/30/83 prior to issuance of low power license.	Licensee is submitting "hands on" training program for staff consideration. This is no longer in the active appeal process. It will be reinstated if the licensee requests further appeal.

5/18/84

TABLE 3

SUPPLEMENT TO STATUS OF PLANT-SPECIFIC BACKFITTING ISSUES

<u>I.D.#</u> <u>Plant</u> <u>PM</u> <u>Tech. Rev. Br.</u>	<u>Issue</u>	<u>Status</u>
OR-84-5 Davis-Besse A. DeAgazio ASB/DSI	Required to modify Tech Specs to ensure availability of AFW system. Identified in ASB's SER 8/82.	Telecon 4/24 with licensee indicated it will submit the required Tech Specs by 6/30/84. Licensee confirmed its intentions in its letter of 5/10/84. <u>Issue resolved.</u>
OR-84-6 Turk. Pt. 3/4 D. McDonald ASB/DSI	Required to provide prompt corrective action on upgrade of vital area alarm system and barriers. Identified during NMSS RER 5/27/83.	Licensee will provide their comments on this issue along with identification of actions being taken and schedules for future actions by end of May 1984.
OR-84-7 Turk. Pt. 3/4 D. McDonald ASB/DSI	Required to identify new vital areas. Identified during RER/VAV site audit 5/27/84.	Licensee will provide their comments on this issue along with identification of actions being taken and schedules for future actions by end of May 1984.
OR-84-8 Kewaunee D. Neighbors METB/DSI	Required to upgrade Radiological Environmental Tech. Specs. to meet intent of App. I. Identified during staff review of App. I.	Licensee expected to send response re: intention to appeal by 5/25/84.
OR-84-9 Kewaunee D. Neighbors METB/DSI	Required to upgrade Tech. Specs. on ESF filters. Identified during staff review of proposed App. J Tech. Specs.	Licensee contends existing Tech. Specs. are adequate; will respond to NRC by 5/25/84.

5/18/84

TABLE 3

SUPPLEMENT TO STATUS OF PLANT-SPECIFIC BACKFITTING ISSUES

<u>I.D.#</u> <u>Plant</u> <u>PM</u> <u>Tech. Rev. Br.</u>	<u>Issue</u>	<u>Status</u>
OR-84-5 Davis-Besse A. DeAgazio ASB/DSI	Required to modify Tech Specs to ensure availability of AFW system. Identified in ASB's SER 8/82.	Telecon 4/24 with licensee indicated it will submit the required Tech Specs by 6/30/84. Licensee confirmed its intentions in its letter of 5/10/84. <u>Issue resolved.</u>
OR-84-6 Turk. Pt. 3/4 D. McDonald ASB/DSI	Required to provide prompt corrective action on upgrade of vital area alarm system and barriers. Identified during NMSS RER 5/27/83.	Licensee will provide their comments on this issue along with identification of actions being taken and schedules for future actions by end of May 1984.
OR-84-7 Turk. Pt. 3/4 D. McDonald ASB/DSI	Required to identify new vital areas. Identified during RER/VAV site audit 5/27/84.	Licensee will provide their comments on this issue along with identification of actions being taken and schedules for future actions by end of May 1984.
OR-84-8 Kewaunee D. Neighbors METB/DSI	Required to upgrade Radiological Environmental Tech. Specs. to meet intent of App. I. Identified during staff review of App. I.	Licensee expected to send response re: intention to appeal by 5/25/84.
OR-84-9 Kewaunee D. Neighbors METB/DSI	Required to upgrade Tech. Specs. on ESF filters. Identified during staff review of proposed App. J Tech. Specs.	Licensee contends existing Tech. Specs. are adequate; will respond to NRC by 5/25/84.

5/18/84