

JUN 29 1984

MEMORANDUM FOR: Gary M. Holahan, Chief
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THRU: John A. Zwolinski, Section Leader
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FROM: Paulette P. Tremblay, Project Manager
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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 May 1984 including recent action on Palo Verde. 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.

One significant change occurred since last month's report; the fire protection issue for Palo Verde was recently resolved. The staff evaluated the licensee's position given at the appeals meeting (AD level) on May 31, 1984, and informed the licensee of its concurrence with that position on June 24, 1984. The licensee agreed to send a confirmatory PRA to the staff in the near future.

Another significant event is anticipated to occur within the next week for inclusion in next month's report. All the open fire protection items for LaSalle 1/2 will be closed since the licensee verbally informed the staff of its decision to comply with the staff's position. The licensee expects to send its concurrence in a letter the first week of July. With these anticipated resolutions, there will be 9 open issues out of the total 21 issues identified to date.

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STATUS OF PLANT-SPECIFIC BACKSETTING REQUIREMENTS FOR ORS

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)
ID # PLANT ISSUE	IDENTIFICATION SOURCE	CORRESPONDENCE	FIRST LEVEL APPEAL REQUESTED	AD MEETING	MEETING MINUTES	AD POSITION	LICENSEE RESPONSE	SECOND LEVEL APPEAL REQUESTED	DD MEETING	MEETING MINUTES	DD POSITION	LICENSEE RESPONSE	THIRD LEVEL APPEAL REQUESTED	VALUE IMPACT ANALYSIS	DD DECISION	LICENSEE RESPONSE	ULTIMATE DISPOSITION
SA-03-1 Orsden 2 Valves	S-11/03	L-12/03 S-3/04 L-5/04															
SA-03-2 Palladas MSIV	S-1/02	L-8/03 S-9/03															
OR-03-3 Rancho Seco AFUS	S-9/03	L-11/03 L-5/04	L-11/7/03 (T) Y-4/30/04 (C)														
OR-03-4 Oconee 1/2/3 STA	S-11/03	L-1/04	N														1/20/04
OR-03-5 Hatch 1/2 Tech Spec	S-10/03		N														10/28/03
L-03-6 (See Table 2)																	
L-03-7 (See Table 2)																	
L-03-8 LaSalle 1/2 App B	S-1/03		N														11/22/03
L-03-9 (See Table 2)																	
L-03-10 (See Table 2)																	
L-03-11 (See Table 2)																	
OR-03-12 Farley 2 Tech Specs	L-10/02	S-12/02		3/23/03		4/29/03		5/31/03	8/16/03	8/30/03	9/12/03	10/6/03					L-1/13/04 S-1/27/04

LEGEND

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

LEGEND

- (13) Date of licensee response of appeals meeting
- (14) L-date of appeal by licensee
Y-proposed date of appeal meeting
N=no appeal; issue resolved
- (15) Date of Value/Impact Statement
- (16) Date of DD final decision
- (17) V/I Statement
- (18) Date of ultimate disposition of issue

TABLE 2
STATUS OF PLANT-SPECIFIC BACKFITTING REQUIREMENTS
FOR CP/DLS

(1) ID	(2) IDENTIFICATION SOURCE	(3) CORRESPONDENCE	(4) FIRST LEVEL APPEAL REQUESTED	(5) AD MEETING DATE	(6) MEETING MINUTES	(7) AD POSITION	(8) LICENSEE RESPONSE	(9) SECOND LEVEL APPEAL REQUESTED	(10) DO MEETING	(11) MEETING MINUTES	(12) DO POSITION	(13) LICENSEE RESPONSE	(14) THIRD LEVEL APPEAL REQUESTED	(15) VALUE IMPACT ANALYSIS	(16) DO DECISION	(17) LICENSEE RESPONSE	(18) ULTIMATE DISPOSITION
1-6	5-7/82 Verde R	1-5/83 5-7/83 1-11/83 1-2/84	Y-5/31/84	5/31/84	6/25/84												5-6/25/84
1-7	5-11/83 M 2 PMP	5-2/84 1-5/84 5-6/84															
1-8	5-1/83 R																11/22/83
1-9	5-6/83 eham ding	5-3/84															5-4/84
1-10	5-6/83 eham																5-4/84
1-11	5-6/83 eham	5-9/83															1-6/84
1-12	5-11/83 R	1-1/84	1-1/27/84	3/28/84	4/24/84	3/28/84											1-3/28/84
2	5-11/83 R	1-1/84	1-1/27/84	3/28/84	4/24/84	3/28/84											1-3/28/84
3	5-11/83 R	1-1/84	1-1/27/84	3/28/84	4/24/84	3/28/84											1-3/28/84
4	5-11-83 R	1-1/84	1-1/27/84	3/28/84	4/24/84	3/28/84											1-3/28/84

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

LEGEND
 (13) Date of licensee response of appeals meeting
 Y= proposed date of appeal meeting
 N= no appeal, issue resolved
 (15) Date of Value/Impact Statement
 (16) Date of DO final decision
 (17) V/I Statement
 (18) Date of ultimate disposition of issue

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 presented its position 5/3/84. EQB is evaluating licensee's justification; expected to be completed by end of July.
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 (expected in July). The appeals meeting has been put on hold.

6/26/84

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-83-4 Oconee 1/2/3 J. Suermann LQB/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>
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 held 5/31/84. Staff evaluated and concurred w/licensee's position 6/25/84. Licensee will send confirmatory analysis (PRA). <u>Issue resolved.</u>

6/26/84

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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-83-7 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 is considered an open item in draft SER (5/15/84).	Applicant sent letter to staff 5/11/84 requesting CRGR review and meeting with NOAA/NWS. Meeting was held 5/15/84. Staff responded 6/20/84 to licensee's letter reminding them of appeal process.
	Issue identified by LB2 during 11/14/83 plant review. NRC discussed position with licensee 11/22/83 and 5/15/84.	
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).	Licensee committed to provide isolation of instruments by startup after first refueling after initial fuel load. <u>Issue resolved.</u>
	Inspection by RIII identified issue 11/14/83	
L-83-9 Shoreham R. Caruso RRAB/DST	Required to install additional sump pumps since extreme flooding will knock out all ECCS components because of containment design.	Staff believes resolved - will send SSER #6 to RI. Issue no longer handled by DL. <u>Closed issue.</u>
	RI identified issue in 6/8/83 memo to DL.	
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.	Applicant does not want to spend \$2-3 million to pipe discharge back into primary containment, but it may agree to pipe it to sump. NRR does not support backfit.
	RI identified issue in 6/8/83 memo to DL.	Region I (Greenman) will discuss this issue with applicant. Issue no longer handled by DL. <u>Closed issue.</u>

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-83-11 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 is considered a license condition. CHEB identified issue during review 6/83.	Applicant has agreed to develop the procedure which will be reviewed by CHEB per license condition. Issue determined not to be a backfit item upon re-evaluation. <u>Closed issue.</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>
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>

6/26/84

TABLE 3

SUPPLEMENT TO STATUS OF PLANT-SPECIFIC BACKFITTING ISSUES

I.D.# Plant PM <u>Tech. Rev. Br.</u>	<u>Issue</u>	<u>Status</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.
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 provided their comments on this issue along with identification of actions being taken and schedules for future actions May 11, 1984. NRR (Special Proj.) sent these to NMSS for their review. NRR awaiting response from NMSS.

6/26/84

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-84-7 Turk. Pt. 3/4 D. McDonald ASB/DSI	Required to identify new vital areas. Identified during RER/VAV site audit 5/27/84.	Licensee provided their comments on this issue along with identification of actions being taken and schedules for future actions May 11, 1984. NRR (Special Proj.) sent these to NMSS awaiting response from NMSS.
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; not yet received.
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; not yet received.

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