



LONG ISLAND LIGHTING COMPANY

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Direct Dial Number

November 9, 1984

SNRC-1105

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

Exemption Request
Shoreham Nuclear Power Station - Unit 1
Docket No. 50-322

Dear Mr. Denton:

In the course of the NRC Staff's safety review of Shoreham, a number of issues were identified which required either an exemption from an NRC regulation or a license condition. Each of these issues was thoroughly reviewed by the Staff, and its resolution either was documented and approved in the Staff's Safety Evaluation Report and supplements to it, or a schedule for resolution was established.

Recently, members of your Staff have asked LILCO to submit formal exemption requests for a number of issues discussed in the SER and its supplements and Region I inspection reports, notwithstanding that the Staff had already approved exemptions or license conditions, as appropriate. We understand that this request stems from a concern expressed by some NRC Staff members that the NRC's May 16, 1984 Order in the Shoreham case, CLI-84-8, creates special requirements for the entire Shoreham case, rather than being limited to the special situation faced by the Commission in that Order. For the reasons that follow, LILCO strongly believes that the order should not be read so

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broadly. Nevertheless, in order to eliminate potential complications in the re-review of these already approved exemption requests, LILCO presents them again in Attachment 1 hereto, with reference to the "as safe as" and "exigent circumstances" criteria contained in the May 16 Order.

The May 16 Order was limited to the issue of whether LILCO would need an exemption from GDC 17 to conduct low power testing without a fully qualified onsite power source, and, if so, the standard to be applied to that exemption request. Following the Commission's May 16 Order, the Staff expressed concern that the standards enunciated in the limited context of GDC 17 might have been intended to be applied more broadly. Thus, the Staff requested further Commission guidance in SECY-84-290 dated July 17, 1984. In seeking guidance from the Commission on the standards for exemptions, the Staff stated that the Shoreham decision in CLI-84-8, "establishes practices and requirements for licensing which differ significantly from prior regulatory interpretation and practice."

In response to the Staff's request, the NRC held a meeting on July 25, 1984, to discuss the handling generally of exemptions from NRC regulations. As a result of the meeting, the Secretary of the Commission issued a memorandum to the Executive Director for Operations and the General Counsel concerning the Commission's exemption policy. The Commission directed that:

For the near term the staff should read the Shoreham decision as applying Shoreham only and thus continue with its past practice in authorizing exemptions and imposing license conditions on licensees in accordance with existing regulations.

Of course, the "Shoreham decision" in question dealt only with the issue of an exemption request from GDC 17 on a matter on which LILCO clearly differed from every other operating or NTOL plant: substitution of alternate sources of AC power for qualified diesel generators. In fact, as the Low Power Licensing Board recognized, the "as safe as" standard was no more than an articulation of what LILCO said it could prove with respect to GDC 17. Long Island Lighting Company (Shoreham Nuclear Power Station, Unit 1), Initial Decision at 28 (October 29, 1984).

The narrow scope of the May 16 Order was confirmed very recently in a Commission order concerning the Grand Gulf plant, where the Commission reiterated that the Shoreham decision for the near term was to apply only to the "particular circumstances" faced by the Commission in that decision. Mississippi Power & Light Co. (Grand Gulf Nuclear Station, Unit 1), CLI-84-19, slip op. at 8 n.7 (October 25, 1984). Consequently, LILCO believes that there is no rational basis for any other course than the Staff's continuing to treat exemption requests and license conditions, other than the one specifically addressed by the May 16 Order, in accordance with the Commission's long-standing regulations at 10 CFR § 50.12(a) and the Staff's established practice, pending approval of a comprehensive exemption policy. Any other course would, simply, hold Shoreham to an indefensibly different standard from other reactors being reviewed by the Commission.

All of the exemptions and license conditions in question have already been considered at length and their resolution approved and documented in accordance with traditional Staff practice. Thus no further action is warranted. In addition, as noted above, the "as safe as" and "exigent circumstances" tests that some Staff members suggest LILCO address are consistent only with the anomalous May 16 Order and are not required under existing Commission regulations or historic Staff practice. Nonetheless, to preclude any delay in the issuance of a license for Shoreham, LILCO has agreed to submit exemption requests for the following issues:

- A. Containment Isolation (Instrument Lines)
- B. Main Steam Isolation Valves - Appendix J Testing
- C. Seismic Qualifications
- D. Remote Shutdown Panel

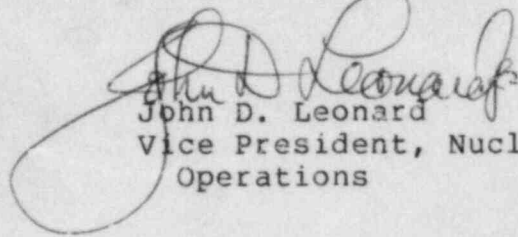
These exemption requests, which are submitted without prejudice to LILCO's position that such requests are unnecessary, are contained in Attachment 1 to this letter. Significantly, these exemption requests are of the type routinely granted to other plants in issuing operating licenses. Since the NRC Staff has already approved the technical resolution of these issues, we expect that these requests will be acted upon promptly.

It should be noted that the Staff initially had requested exemptions for certain additional items. Exemption requests are no longer required for these items because of actions which

LILCO has taken or is taking (including modifications and commitments). A listing and explanation of these items are provided in Attachment 2 to this letter.

LILCO trusts this information is responsive to your requests. Should you have any questions, please contact this office.

Very truly yours,



John D. Leonard
Vice President, Nuclear
Operations

cc: P. Eselgroth
C. Petrone

REQUESTS FOR EXEMPTION

PART I: Technical Description and
Demonstration of Compliance With
"As Safe As" Standard

A. Containment Isolation

Certain instrument lines penetrating containment and open to the containment atmosphere, but not part of the automatic reactor protection system, have a single isolation valve rather than the double isolation valves required by General Design Criterion (GDC) 56. The NRC Staff has already reviewed this aspect of Shoreham's design and concluded in SSER No. 4, § 6.2.3, that operation until the first refueling outage is acceptable with the present configuration of these instrument lines. The basis for this conclusion was as follows:

The containment isolation capability required by GDC 56 is intended to preclude the release of radioactive material from the containment following an accident inside the containment. This is normally accomplished by providing two isolation valves on each line. Although the instrument lines in question only have a single isolation valve, all instruments (including the internal pressure boundary of the instrument), sensing lines, and standpipes identified as being an extension of the primary containment boundary are capable of maintaining pressure boundary integrity during and following postulated design basis events concurrent with a seismic event. During plant operation, the

integrity of the instrument lines is demonstrated by the proper operation of the instruments. Following an accident, loss of integrity can be postulated only as a random passive failure of the instrument line pressure boundary. This is an extremely unlikely event. The peak pressure that would be experienced by the lines and instruments during an accident is limited to the projected peak containment pressure of 46 psig, whereas the design pressure of the instruments and tubing is greater than the projected peak containment pressure. The integrated leak rate test and other tests conducted on these lines during the construction or pre-operational testing phases demonstrate this capability. Thus, the design provides substantial double barrier protection.^{1/}

In addition, each instrument line in question is of such a size so that if a postulated failure of the piping or of any component (including any valve body in the line outside primary reactor containment) were to occur during normal reactor operation:

^{1/} Only one exception exists: a static O-ring for pressure switch 1T49-PS085. However, this instrument is used for periodic containment leak rate testing, does not provide a safety function and has its own manual isolation valve. The individual manual isolation valve upstream of this instrument will be maintained normally closed until the O-ring is demonstrated to maintain pressure boundary integrity under the conditions described above.

- (a) the resulting leakage will be reduced to the maximum extent practical consistent with other safety requirements;
- (b) the integrity and functional performance of the secondary containment and its associated safety systems (e.g., filters) will be maintained; and
- (c) the potential offsite exposure will be substantially below the guidelines of 10 CFR Part 100.

During operation in Phases I and II of low power testing, primary containment isolation capability is not required at all because primary containment is not, and need not be, established. Indeed, as the Shoreham ASLB (Low Power) found, there can be no release of fission products since none will be generated during Phase I and a negligible quantity exists during Phase II. Thus, this exemption request has no impact on the safety of the plant during these phases.

Beyond Phases I and II, operation of Shoreham with the current design would be substantially as safe as operation of a plant in full compliance with GDC 56 or Regulatory Guide 1.11 (which provides guidance for complying with GDC 56). First, viewed in the context of the overall safety of the plant the exemption request has little safety significance. Only a relatively small number of the plant's containment instrument line penetrations do not meet the general design criteria. Moreover, the condition will only exist for a small fraction of the life of the plant: LILCO has committed to make the necessary modifications to the plant prior to startup after the first

refueling outage. Since loss of coolant accidents are extremely unlikely events, the probability that one would occur during the first cycle of operation is very remote. Second, the current design provides double barrier protection on the instrument lines in question. And third, each instrument line is of such a size so as to minimize the radiological consequences of a rupture.

B. Main Steam Isolation Valves (MSIVs) - Appendix J Testing

Appendix J to 10 CFR 50 requires local leak rate testing of boiling water reactors main steam isolation valves (MSIVs) at the peak calculated containment pressure for the design basis accident (§§ II.H.4, III.C.2). Furthermore, Appendix J requires that the measured leak rates be included in the summation of the local leak rate test results (§ III.C.3). The NRC Staff has already concluded in SER § 6.2.5.1 that an exemption is justified at Shoreham to allow local leak rate testing of the MSIVs at a reduced pressure and to exclude the measured leakage from the combined local leak rate for the local leak rate test results.

Testing of the MSIVs at a reduced pressure was accepted by the Staff since testing at peak calculated containment pressure produces demonstrably inaccurate and misleading results. The reason is that each main steam line is provided with two MSIVs that are configured such that post-accident pressure in the steam lines serves to seat the valves rather than open them. In order to test the two MSIVs simultaneously, however, the line between

the valves must be pressurized, which means that pressure is applied to the inboard valve in the reverse direction to what is expected during an accident. This testing in the reverse direction tends to unseat the inboard valve, lifting the disc and permitting leakage past it at peak calculated containment pressure. Thus, testing at the peak calculated containment pressure would be meaningless because the inboard valve would unseat, allowing excessive leakage.

To remedy this problem, the proposed test calls for a test pressure of 25 psig (instead of peak calculated containment pressure of 46 psig) to avoid lifting the disc of the inboard valve. The total observed leakage through both valves (inboard and outboard) is then assigned to the penetration. If the combined leakage of two valves exceeds the technical specification allowable value for any one MSIV, further testing is done to discriminate leakage between the valves. This assures that no single valve exceeds the allowable leakage which is assumed for radiological consequences by the safety analysis. In addition, since the inboard valve is tested in the reverse direction, the post-accident leak rate is likely to be less than the test leak rate because the valve would tend to seat more firmly under accident conditions. Although this phenomenon has not been quantified, the effect of the reduction in test pressure would clearly tend to be offset by the effects of testing in the reverse direction.

Excluding the measured MSIV leakage from the combined local leak rate for the local leak rate test results is justified because this type of leakage and its radiological consequence has been separately accounted for in the safety analysis. In the event of a loss of coolant accident, the MSIV leakage control system will maintain a negative pressure between the MSIVs. Any leakage into this space will be discharged into a volume where it will be processed by the reactor building standby ventilation system (RBSVS) prior to being released to the environment. A separate radiological analysis for this potential source of containment atmosphere leakage was performed and the results are documented in the Shoreham FSAR, Chapters 6 and 15. The periodic local leak rate test will assure that the leakage assumed in the analysis is not exceeded.

This exemption from Appendix J is not unique to Shoreham. In fact, this exemption is included as part of the Standard Technical Specifications (NUREG-0123) and is consistent with current regulatory practice for BWRs.

Operation of Shoreham with this exemption is as safe as operation would be without the exemption. The exemption does not have any impact on the operation of plant equipment. With respect to the adequacy of testing, as shown above, the testing that will be performed is conservative and therefore will yield results similar to or more conservative than those that would have been obtained by literal Appendix J testing. The testing to be

performed is also identical to that specified in the NRC Standard Technical Specifications and used by other BWRs. MSIV leakage is collected and processed by the MSIV leakage collection system, and specifically accounted for in the safety analysis demonstrating compliance with regulatory guidelines and the limits of 10 CFR Part 100. Thus, LILCO's approach is equivalent to including the leakage in the overall leakage results and then calculating the radiological effect of that total.

C. Seismic Qualifications

Although there is no explicit requirement in the NRC's regulations that all post-accident monitoring equipment be seismically qualified, LILCO nonetheless has committed to qualify post-accident monitoring equipment in accordance with Regulatory Guide 1.97, Revision 2. LILCO has kept the NRC Staff informed of the status of the seismic qualification of plant equipment and has supplied the Staff with justification for interim operation where qualification could not be completed prior to fuel load. The NRC Staff approved these justifications in Chapter 3 of SSER No. 7.

Nonetheless, the Staff has asked LILCO to submit an exemption request for this equipment. To the extent that qualification may be required by GDC 2, or some other regulation, LILCO requests an exemption for the equipment listed below. This equipment is the only equipment for which a commitment has been made and qualification has not been completed.

1. Radiation Monitoring Panels
(Mark 1D11*PNL-117A and B)

The recorder power supplies (1D11*E/S-117A and C) provide power to the recorders which are located in the control room cabinets (1D11*PNL-117A & B). These power supplies are the only items in the cabinets which have not completed seismic qualification. The recorders are used to keep a historical log of the readings generated at panels 1D11*PNL-126 and 134 and this information is then utilized in determining the release of radioactivity to the surroundings. The subcomponent requiring qualification is currently involved in a test program which is expected to be completed with a report available in the first quarter of 1985. Should an accident occur and lead to failure of the recorder power supplies, the indicating devices contained in the control room cabinet will not be affected since both physical and electrical isolation is provided between devices. Therefore, the failure of these devices will not degrade the monitoring function of any other components. Failure of the devices will require that an operator periodically record information from the above mentioned indicating devices so that the estimate of the release of radioactivity to the surroundings can be generated. The NRC Staff found that interim operation of the cabinets and internals is acceptable for power levels not to exceed 5% power.

2. Radiation Monitoring Pumps
(Mark 1D11*P-126, 134)

The specific items of concern are the auxiliary pump skids

used to supply the sample air to the post-accident station vent and reactor building standby ventilation system exhaust monitors. If there is seismic failure of the pump skids, alternate means such as sampling via the post-accident sampling system, grab sampling of the effluents, and normal range monitors are available to determine the gaseous effluent releases from the plant. It should be noted that the buildup of radioactivity inventory during operation at a power level up to 5 percent will be comparatively small. In view of these considerations, the NRC Staff found interim operation acceptable for power levels not to exceed 5% power.

Operation of the plant pending the qualification of this radiation monitoring equipment is as safe as operation with qualified panels. During Phase I and II low power testing activities there are no accidents which require this equipment to function. The only function this equipment serves during operation beyond Phases I and II is post-accident monitoring. Therefore, this exemption has no effect on the probability of any postulated accident. The consequences of any accident are not affected because the monitoring function can be accomplished by alternate methods as described above.

D. Remote Shutdown Panel (RSP)

GDC 19 requires that

Equipment at appropriate locations outside the control room shall be provided (1) with a design capability for prompt hot shutdown of the reactor, including necessary instrumentation and controls to maintain the unit in a safe condition during hot shutdown and (2) with a potential capability for subsequent cold shutdown of the reactor through the use of suitable procedures.

The NRC Staff, in the Standard Review Plan, NUREG-0800, Section 7.4, Safe Shutdown Systems, states that the remote control stations and equipment used to maintain safe shutdown should be designed to accommodate a single failure. Since GDC 19 contains no explicit requirement that the remote shutdown capability be able to withstand a single failure, LILCO does not agree that exceptions to the single failure criterion from the RSP constitute non-compliance with the NRC's regulations. LILCO, however, to avoid unnecessary licensing delays, requests an exemption from GDC 19 as interpreted by the Staff.

The "Resolution of Suffolk County Contention 1 -- Remote Shutdown Panel" and SSER No. 3, § 7.4.3, listed the instrumentation and controls which are needed to meet the single failure criterion noted above. Some of these items have been identified by LILCO as already existing in the plant. LILCO committed to provide the additional instrumentation and controls prior to completion of the first refueling outage. This proposal was agreed upon by Suffolk County and the NRC Staff in the "Resolution of Suffolk County Contention 1 -- Remote Shutdown Panel." This settlement agreement was accepted by the Licensing

Board on December 21, 1982. Tr. 17,198. The NRC Staff set out its rationale for accepting the proposal in § 7.4.3 of SSER No. 3. First, there is an extremely low probability that an event requiring evacuation of the control room will occur concurrent with a single failure in the primary shutdown path at the RSP during the first cycle of operation. The Staff also found that the redundant systems themselves will still be operable from remote locations: only the indication for certain parameters will not be available until the first refueling outage. Thus, this exemption request does not affect the ability of plant equipment to perform its required function. Furthermore, as documented in SSER No. 7, a system operational verification test of the RSP was successfully performed assuming a single worst case failure.

Operation of the plant during Phases I and II are unaffected by the exemption request. During Phase I, the reactor is in a cold shutdown condition. Thus, the RSP has no effect on the plant's ability to reach cold shutdown. Similarly, during Phase II operation, use of the remote shutdown panel would not be necessary to reach cold shutdown since cold shutdown would be attained by merely transferring the reactor mode switch to shutdown. Thus, for Phases I and II, operation of the plant with this exemption would be as safe as operation with the monitoring equipment in question installed.

Operation of Shoreham beyond Phases I and II during the first cycle with the present remote shutdown systems is substantially as

safe as operation would be utilizing a remote shutdown system which strictly meets the single failure criterion. In SNRC-638, dated November 23, 1981, LILCO documented a single failure analysis for the Shoreham remote shutdown system which demonstrated that sufficient equipment was available to ensure that safe shutdown could be achieved assuming a single failure. As noted above, certain additional monitoring and control equipment is to be added at the first refueling outage. Although this additional equipment may be useful, its absence does not prevent the operator from safely shutting down the plant. As a result, the plant's ability to reach cold shutdown using the remote shutdown system is not adversely affected by the granting of this exemption request.

PART II: Exigent Circumstances

As already noted, LILCO believes that the matters discussed in this letter should be accorded the same treatment that the NRC Staff gives to similar exemption requests and license conditions at other nuclear plants. It is the NRC's established practice that applicants need not show exigent circumstances for requests for exemption under § 50.12(a). Moreover, the Staff routinely finds that the public interest requirements of § 50.12(a) are met where the applicant can demonstrate that the proposed exemption presents no undue risk to the public health and safety. Since LILCO has demonstrated that the exemptions and license conditions

discussed above present no undue risk to the public health and safety -- in fact, operation of the plant with them is substantially as safe as operation without them -- no further analysis should be required.

The NRC Staff, however, has asked LILCO to address the exigent circumstances requirement set out by the Commission in its May 16, 1984 order concerning LILCO's GDC 17 exemption request. While LILCO believes this is unnecessary, it submits the following analysis to avoid unnecessary licensing delays.

Stage of the Facility's Life

As the Licensing Board hearing low power license matters concluded, Shoreham is physically completed. Long Island Lighting Co. (Shoreham Nuclear Power Station, Unit 1), Initial Decision at 59 (October 29, 1984). This factor weighs in favor of granting the requested exemptions.

Financial or Economic Hardships

Again, to quote the Low Power Licensing Board,

It is almost self-evident that there must be financial hardships to someone when there is a physically completed nuclear facility, standing unused and non-productive because of substantial licensing delays.

Initial Decision at 60. If it is the Staff's position that it will not approve a license until these exemptions are granted, then as the Licensing Board's opinion reflects, LILCO will be

subjected to financial and economic hardships. Thus, this factor weighs in favor of granting the requested exemptions.

Internal Inconsistencies in the Regulations

One of the factors that should be considered in exercising discretion regarding an exemption request is the presence of internal inconsistencies in the regulations. With respect to these exemption requests, LILCO is being subjected to treatment inconsistent with that afforded any other applicant. As the Low Power Licensing Board found:

The Commission has under consideration the Staff's request for guidance [for handling exemption requests], but it is clear that there are substantial inconsistencies between prior NRC interpretation of practice regarding exemption situations, compared with whatever guidance the Commission ultimately gives concerning the interpretation and application of the 'Shoreham rule'.

Initial Decision at 65. To the extent that the NRC Staff is attempting to expand the so-called "Shoreham rule" to exemption requests other than the GDC 17 request pending in front of the Commission when it issued its May 16 Order, LILCO continues to be subject to inconsistent treatment. Thus, this factor weighs in favor of granting the exemption.

Good Faith Effort to Comply with Regulations

With respect to each of these exemption requests, LILCO attempted to comply with the NRC's regulations and accepted Staff

practice for handling exemptions and license conditions. For example, with respect to MSIV leakage testing, LILCO had provided the NRC with a description of its Appendix J leak testing in the FSAR. Similarly, LILCO identified the instrument lines in question and provided justification for operation with the current design in letter submittals. (SNRC-791, dated November 11, 1982; SNRC-825, January 24, 1983). In fact, for each of the exemption requests included in this letter, LILCO provided the Staff with information concerning the safety of operation given the present design of the plant. That information has been reviewed by the Staff and approved in the Safety Evaluation Report or one of its supplements. Thus, to the extent LILCO knew that Shoreham did not strictly comply with an aspect of the NRC's regulations, LILCO took timely and appropriate steps to comply with the standard practice for dealing with such exceptions. This factor weighs in favor of the requested exemptions.

Moreover, with respect to each of the individual exemption requests, LILCO has made and is continuing to make good faith efforts to meet the intent or requirements of the NRC's regulations.

A. Containment Isolation

LILCO has met the NRC's requirements for containment isolation with respect to hundreds of containment penetrations. This exemption request relates to a relatively small number of

instrument lines which are not in strict compliance with GDC 56. LILCO has, however, committed to modify these lines by completion of the first refueling outage so that they do comply with the requirements of GDC 56. Further, these instrument lines are of the same design as instrument lines in the reactor protection system which do meet the requirements of the NRC's regulations for those lines.

B. Main Steam Isolation Valves

Although LILCO's proposed testing for the main steam isolation valves does not strictly comply with Appendix J, LILCO has proposed testing which accomplishes the intent of the Appendix J test. In fact, the test proposed by LILCO is identical to testing that is included in the standard technical specifications for BWRs.

With respect to including the MSIV leakage in combined leak rate total for the local leak rate test, LILCO has performed a separate radiological analysis for the MSIV leakage. Since the purpose of this portion of the regulations is to ensure that the radiological effects of all leakage are considered, LILCO has met the intent of this regulation.

C. Seismic Qualifications

LILCO has made a good faith effort to ensure that the plant meets GDC 2 with respect to the seismic qualification of

equipment. Only two items of equipment are identified as requiring a justification for interim operation. Neither of these items is required for safe shutdown of the plant. Rather, they are post accident monitoring equipment installed in accordance with Regulatory Guide 1.97, Revision 2. In both instances, other equipment can be used to accomplish the function to be performed by the non-qualified equipment. Significantly, justifications for interim operation pending completion of seismic qualification are not unique to Shoreham. Requests similar to this one have been routinely granted for other plants.

D. Remote Shutdown Panel

LILCO has made a good faith effort to ensure that the remote shutdown system for the Shoreham plant can accommodate a single failure and still accomplish its function. LILCO has demonstrated that sufficient equipment is available to insure that a safe shutdown can be achieved even assuming a single failure. The instruments in question are used only to monitor the plant and are not necessary for achieving cold shutdown. Further, LILCO has committed to add additional equipment prior to the completion of the first refueling outage. Thus, LILCO has made good faith efforts to ensure that the requirements of the regulations are met.

Public Interest in Adherence to Regulations

There is a general public interest in adherence to the intent of regulations; however, the actual importance of any departure from their literal requirements depends on the circumstances. As the Low Power Licensing Board found with respect to GDC 17, there is minimal public interest in strict or mechanical adherence to the regulations where it can be demonstrated that an exemption has little or no effect on the safe operation of the plant. As has already been demonstrated, none of the exemptions requested by this letter has any significant impact on safe operation of Shoreham. Thus, there is no significant public interest in requiring strict adherence to the NRC's regulations.

In addition, where an exemption is requested for only a limited period of time, whatever public interest may exist in requiring strict adherence is diminished. See Initial Decision at 68. The exemption requests for containment isolation, seismic qualification, and remote shutdown panel are all exemption requests for a limited period of time. Since LILCO has demonstrated that these exemptions will not have any significant impact on the public health and safety, this consideration further weighs in favor of granting the requested exemptions.

Safety Significance of the Issues Involved

Where it can be demonstrated that there is no adverse safety significance created by an exemption, the equities weigh in favor of granting the exemption. Initial Decision at 69. Since LILCO

has demonstrated that current design of the plant is substantially as safe as the design would be if LILCO strictly complied with the NRC's regulations, this factor weighs in favor of granting the exemptions requested.

EXEMPTION REQUESTS NO
LONGER NECESSARY

Exemption requests initially requested by the Staff for the following items need not be filed, for the reasons stated below:

1. Exemption from GDC 2 for Seismic Qualification
 - a. HPCI Turbine - LILCO is in the process of making the necessary modifications to achieve seismic qualification of the HPCI Turbine. This effort has been expedited and will be physically completed by mid-November.
 - b. Scram Discharge Volume Vent and Drain Valves - Although qualification was only required prior to exceeding five percent power (SSER No. 7), qualification has now been completed. The "Status of Equipment Summary List" will be updated to reflect this completion of qualification.
 - c. Scram Discharge Volume Solenoid Valves - Although qualification was only required prior to exceeding five percent power (SSER No. 7), qualification has been completed. The "Status of Equipment Summary List," as submitted by letter SNRC-1055, documents this qualification.
 - d. Power Range Monitor Panel (B11-P608/1B11*PNL608) - Although qualification was only required prior to exceeding five percent power (SSER No. 7), qualification has been completed. The "Status of Equipment Summary List," as submitted by letter SNRC-1055, documents this qualification.

- e. In vessel Storage Rack (F16-E006/1F16*FAK-09) - The in vessel storage rack is not necessary for any fuel handling operations and is not required by any regulation. LILCO hereby commits not to use the in vessel storage rack as an in vessel storage area for fuel bundles until seismic qualification of this item is complete.
 - f. Equipment Lockers in the Reactor Building (NRC Region I Inspection Item 84-23-01) - Although NRC Region I had indicated that closure of this item was not required until Phase III, LILCO is in the process of making the necessary modifications to preclude the possibility of seismic induced damage to safety related equipment. This modification will be physically completed within two weeks.
2. Exemption from GDC 23 for Traversing Incore Probe (TIP system) - Although not required until the first refueling outage, LILCO has completed modifications to the TIP system to prevent reinsertion of the TIP probes upon reset of the Engineered Safety Feature actuation signal.
3. Exemption from GDC 23 for Spurious Isolation of HPCI system caused by loss of power to steam leak detection circuitry (Region I Inspection Item 84-32-01) - LILCO is in the process of making modifications to the steam leak detection circuitry to prevent spurious isolation after a loss of power. Although the NRC Region I classified this as an item requiring completion prior to Phase III, LILCO intends to physically complete this modification by mid-November.

4. GE Transient Monitoring System Recirculation Flow Control Unit Modification (Region I Inspection Item 84-20-02) - Any exemption which may have been required is unnecessary since the subject modifications have been completed, reviewed and accepted by Region I. This inspection item is slated to be closed by Region I in Inspection Report No. 84-33.