



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

ENCLOSURE 1

SAFETY EVALUATION REPORT
DAVIS-BESSE NUCLEAR POWER STATION
DOCKET NOS. 50-346
GENERIC LETTER 83-28, ITEM 2.2.1
EQUIPMENT CLASSIFICATION
PROGRAMS FOR ALL SAFETY-RELATED COMPONENTS

1.0 INTRODUCTION

Generic Letter 83-28 was issued by the NRC on July 8, 1983 to indicate actions to be taken by licensees and applicants based on the generic implications of the Salem ATWS events. Item 2.2.1 of that letter states that licensees and applicants shall describe in considerable detail their program for classifying all safety-related components other than RTS components as safety-related on plant documents and in information handling systems that are used to control plant activities that may affect these components. Specifically, the licensee/applicant's submittal was required to contain information describing (1) The criteria used to identify these components as safety-related; (2) the information handling system which identifies the components as safety-related; (3) the manner in which station personnel use this information handling system to control activities affecting these components; (4) management controls that are used to verify that the information handling system is prepared, maintained, validated, and used in accordance with approved procedures; and (5) design verification and qualification testing requirements that are part of the specifications for procurement of safety-related components.

The licensee for the Davis-Besse Nuclear Power Station submitted responses to Generic Letter 83-28, Item 2.2.1 in submittals dated November 7, 1983, and June 10, 1985. We have evaluated these responses and find them to be acceptable.

BB01140404 BB0111
PDR ADDCK 03000346
P PDR

2.0 EVALUATIONS AND CONCLUSIONS

In these sections the licensee's responses to the program and each of five sub-items are individually evaluated against guidelines developed by the staff and conclusions are drawn regarding their individual and collective acceptability.

1. Identification Criteria

Guideline: The licensee's response should describe the criteria used to identify safety-related equipment and components. (Item 2.2.1.1)

Evaluation:

The licensee's response gives the criteria for identifying safety-related equipment and components. A component is considered safety-related if it is required to assure: (a) the integrity of the reactor coolant system pressure boundary, (b) the capability to achieve and maintain a safe shutdown or (c) the capability to prevent or to mitigate the consequences of an accident which could result in potential offsite exposures.

Conclusion:

We find the stated criteria meet the staff's requirements and are acceptable.

2. Information Handling System

Guideline: The licensee's response should confirm that the equipment classification program includes an information handling system that is used to identify safety-related equipment and components. Approved procedures which govern its development, maintenance, and validation should exist. (Item 2.2.1.2)

Evaluation:

The licensee states that the information handling system includes the use of the Q-list, supplemented by controlled drawings and other source documents. It is being converted to the equipment data base, a part of the Davis-Besse Maintenance Management System, which is maintained and updated by procedures that are being developed. Data being entered is done in accordance with procedures. The entry data is compared against source documents and verified by a second individual.

Conclusion:

We conclude that this description of the licensee's information handling system shows that it meets the staff requirements and is acceptable.

3. Use of Information Handling System

Guideline: The licensee response should confirm that their equipment classification program includes criteria and procedures which govern the use of the information handling system to determine that an activity is safety-related and that safety-related procedures for maintenance, surveillance, parts replacement and other activities defined in the introduction to 10CFR50, Appendix B, are applied to safety related components. (Item 2.2.1.3)

Evaluation:

The licensee's responses describe the utilization of the Q-list to determine when an activity is safety-related. Administrative procedure AD 1844.00 "Maintenance," requires the consultation of the Q-list or the computerized information handling system (when fully developed) in determining if an activity is safety-related as part of the maintenance work order system. This procedure is used in preparing any work requests for those activities

identified by this sub-item. The reviews called out by AD 1844.00 insure that the proper procedures are used for maintenance work, routine surveillance testing, accomplishment of design changes, performance of engineering support work, accomplishment of setpoint changes and the performance of special tests and studies. Administrative procedure AD 1847.00, "Station Materials Control," is described as controlling safety-related materials. Other procedures are listed that govern material receipt inspection and for evaluating a vendor's capabilities.

Conclusion:

We conclude that the licensee has described plant administrative controls and procedures which meet the staff requirements for this item and are acceptable.

4. Management Controls

Guideline: The licensee/applicant should confirm that management controls used to verify that the procedures for preparation, validation, and routine utilization of the information handling system have been and are being followed. (Item 2.2.1.4)

Evaluation:

The licensee's response states that their method of managerial control includes verifying procedural compliance in regard to the information handling system, and review and approval of any safety-related administrative procedures. The audit program of the Quality Assurance Department is also used to verify the preparation, validation and routine use of the information handling system and to assure that safety-related activities and their implementation are correct. Audit reports are reviewed and approved by TED's Quality Assurance Director and then distributed to cognizant personnel.

Conclusion:

We find this description of the licensee's program of management controls meets the staff requirements and is acceptable.

5. Design Verification and Procurement

Guideline: The licensee/applicant's response should document that past usage demonstrates that appropriate design verification and qualification testing is specified for the procurement of safety-related components and parts. The specifications should include qualification testing for expected safety service conditions and provide support for licensee's receipt of testing documentation which supports the limits of life recommended by the supplier. If such documentation is not available, confirmation that the present program meets these requirements should be provided. (Item 2.2.1.5)

Evaluation:

The licensor states that the purchase orders for safety-related items contain design verification and qualification testing requirements for both replacement parts and new equipment. The required testing is identified by the Facility Engineering Department and reviewed and approved by the Quality Engineering Department. The requirement for the vendor to submit evidence of testing is specifically addressed by the licensee, and requires qualification reports from the vendor.

Conclusion:

We conclude the licensee's procedures meet the staff requirements for this item and are acceptable.

6. "Important To Safety" Components

Guideline: Generic Letter 83-28 states that licensee/applicant equipment classification programs should include (in addition to the safety-related components) a broader class of components designated as "Important to Safety." However, since the generic letter does not require licensee/applicant to furnish this information as part of their response, staff review of this sub-item will not be performed. (Item 2.2.1.6)

7. Program

Guideline:

Licensees/applicants should confirm that an equipment classification program exists which provides assurance that all safety-related components are designated as safety-related on plant documents such as drawings, procedures, system descriptions, test and maintenance instructions, operating procedures, and information handling systems so that personnel who perform activities that affect such safety-related components are aware that they are working on safety-related components and are guided by safety-related procedures and constraints. (Item 2.2.1)

Evaluation:

The licensee's response to these requirements was contained in submittals dated November 7, 1983, and June 10, 1985. These submittals describe the licensee's program for identifying and classifying safety-related equipment and components which meet the staff requirements as indicated in the preceding sub-item evaluations.

Conclusion:

We conclude that the licensee's program addresses the staff concerns regarding equipment and component classification and is acceptable.