

## LONG ISLAND LIGHTING COMPANY

SHOREHAM NUCLEAR POWER STATION
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JOHN D. LEONARD, JR.
VICE PRESIDENT - NUCLEAR OPERATIONS

JAN 29 1988

SNRC-1416

Mr. William T. Russell Regional Administrator U.S. Nuclear Regulatory Commission Region I 631 Park Avenue King of Prussia, PA 19406

Systematic Assessment of Licensee Performance (SALP)
Shoreham Nuclear Power Station - Unit 1
Docket No. 50-322

Dear Mr. Russell:

This letter provides LILCO's response to your letter of December 1, 1987 which forwarded the Systematic Assessment of Licensee Performance (SALP) report for the Shoreham Nuclear Power Station covering the period of March 1, 1986 through July 31, 1987. Since operational limitations imposed by operating license NPF-36 (5% thermal power) restrict the full assessment of certain performance categories such as radiological controls, our management is mindful of the need to continue our high level of effort.

At the January 5, 1988 SALP meeting, LILCO presented plans for continuing the management efforts that successfully resulted in a high level of performance. LILCO also described the corrective actions necessary to reduce the backlog of Maintenance Work Requests; improve post work housekeeping; improve the quality of LER abstracts; and enhance and prioritize our Engineering support of Shoreham's operations. In response to your questions during the meeting, a discussion on the utilization of industry experience at Shoreham took place. We include a summary of this discussion for the purpose of review.

Post Work Housekeeping and Increased Supervisory Field Time

The following corrective actions are intended to improve the quality of post work housekeeping and increase supervisory field time. The Maintenance Work Request is being revised to

include a Lead Foreman sign-off for overall completion of the job including job site inspection. Additionally, a set of generic goals for first line supervisors has been established, which includes a management evaluation of general housekeeping in assigned areas and at their job sites.

## Licensee Event Reports

LILCO has striven to follow NRC guidance and is pleased that the overall quality of our Licensee Event Reports has improved and was found to be "... above the industry standard." LILCO's efforts to improve LER abstracts include two corrective actions which have already taken place. First, LILCO has performed a self-survey of our LERs and concurs with the NRC concern. Second, we have trained all personnel responsible for completing LERs to ensure abstracts follow the guidelines of NUREG-1022. Specifically, we will focus our attention on improving our abstract discussion to better address the topics of planned corrective action and root cause.

## Engineering and Corporate Technical Support

Several actions will be taken to improve our Engineering and Corporate Technical Support activities in support of Shoreham's operation. LILCO plans to continue and improve our current practice of using PRA to improve plant reliability and safety. We also intend to improve our administrative tracking system for follow-up corrective actions to LERs and to ensure that priorities for these actions remain consistent with planned objectives.

LILCO has initiated design and engineering activities to determine the root cause of excessive engineered safety feature actuations of the Reactor Building Closed Loop Cooling Water (RBCLCW) System and the Reactor Building Standby Ventilation/Control Room Air Conditioning (RBSV/CRAC) Systems. Three causes of RBSVS/CRAC initiations were identified and corrected: (1) surveillance-related, (2) air leakage, and (3) thunderstorms. RBCICW initiations were surveillance related.

To correct surveillance related RBSV/CRAC system actuations engineering personnel recommended an improved method of installing jumper wires needed to perform RBSVS/CRAC surveillance tests. This method is presently being used. An engineering investigation to provide test switches instead of lifted leads for RBSV/CRAC surveillance tests is underway. To correct surveillance related RBCLCW initiations, a permanent platform was engineered to provide easier access by I&C technicians to the RBCLCW instrumentation.

As previously mentioned, air leakage was considered another source of excessive RBSV/CRAC system initiations. To correct this, the Turbine Building-to-Reactor Building passageway door was redesigned and replaced to improve the air tightness of the Reactor Building. Additionally, a better seal design of the truck bay access door in the Reactor Building is being developed. Engineering will be issued by the end of March 1988.

The root cause of the third and final type of RBSV/CRAC system initiations was determined to be caused by thunderstorms. Engineering work was completed, implemented, and has been effective in preventing any additional system initiations due to the effects of thunderstorms.

## Industry Experience

At Shoreham, industry experience has and will continue to be utilized for improving plant reliability and safety. A wide variety of information is reviewed and assessed by Shoreham engineers to determine possible improvements to procedures and systems. Examples of these include INPO Significant Event Reports and Significant Operating Event Reports; vendor documents such as G.E. service and technical information letters; and NRC documents such as Inspection Reports, Licensee Event Reports, Information Notices, AEOD reports, power reactor events and select NUREGs. LILCO's commitment to carefu'ly review and assess the applicability of operating experience in the above mentioned documents for plant improvements has and will continue to yield beneficial results. The lessons learned from this type of information will enable us to maintain and operate a safe and reliable nuclear power plant.

The commitments made and the actions taken by senior LILCO management to improve certain functional areas delineated in the previous SALP reports have had a very positive effect. These will continue so that we may achieve our objective of a Category 1 rating in every Functional Area.

Very truly yours,

Vice President - Nuclear Operations

GJG:ck

cc: Document Control Desk

R. Lo/S. Brown

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