

SAFETY EVALUATION
PILGRIM NUCLEAR STATION, UNIT 1
DOCKET NO. 50-293
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's 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 Pilgrim Nuclear Power Station, Unit 1 submitted a response to Generic Letter 83-28, Item 2.2.1 in submittals dated November 7, 1983 and October 4, 1984. We have evaluated this response and find it to be acceptable.

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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 submittal provides the classification criteria used to determine whether a structure, system, or component is safety related. This is consistent with the definition given in Item 2.2.1.

Conclusion: The licensee's submittal meets the staff requirements for this item and is 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 2.2.1.1)

Evaluation: The licensee states that operable safety-related systems, structures, and components (SS&C) are identified in the Q-list. This list is the information handling system and is verified against the latest approved engineering drawings and the classification criteria. The licensee controls the Q-list through NED procedures 6.07, "Maintaining the Q-list," to assure that latest revision is distributed and used.

Conclusion: The licensee's submittal meets the staff requirements for this item 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 states that the Boston Edison Quality Assurance Manual (BEQAM), Volume II, is applied to all activities affecting safety-related SSC's. These activities include design, procurement, fabrication, handling, shipping, storage, cleaning, erection, installation, inspection, testing, operation, maintenance, repair, refueling, training, and modifying. Any activity associated with a Q-list item is designated as a "Q" activity and is controlled appropriately in accordance with the QA program work controls.

Conclusion: The licensee's submittal meets the staff requirements for this item and is 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 states that the Q-list is the information handling system. The Q-list is established and maintained by the nuclear engineering manager and is controlled by specific plant procedures. Using specific procedures, the quality assurance department performs three in-process checks to ensure the proper routine use of the Q-list. The three checks are a plant design change review, a procurement document review, and a maintenance request review. To provide further assurance to management, the quality assurance department (in accordance with specific procedures) performs random surveillance inspections and periodic audits of all activities in the preparation, validation, and routine use of the Q-list. Audit results are documented and reviewed by management, and followup action on deficient areas is taken.

Conclusion: The licensee's submittal meets the staff requirement for this item 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 licensee included a sample production order for the purchase of safety-related equipment. The sample order addresses the concerns of this item.

Conclusion: The licensee's submittal meets the staff requirements for this item and is acceptable.

6. "Important To Safety" Comments

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 October 4, 1984. The submittals describe the licensee's program for identifying and classifying safety-related equipment which meets 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 classification and is acceptable.

3.0 REFERENCES

1. NRC letter, D.G. Eisenhut to all Licensees of Operating Reactors, Applicants for Operating License, and Holders of Construction Permits, "Required Actions Based on Generic Implications of Salem ATWS Events (Generic Letter 83-28)," July 8, 1983.
2. Boston Edison Company letter, W.D. Harrington to D.B. Vassallo, NRC November 7, 1983, BECO. 83-275.
3. Boston Edison Company letter, W.D. Harrington to D.B. Vassallo, NRC October 4, 1984, BECO. 84-168.

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