



LONG ISLAND LIGHTING COMPANY

SHOREHAM NUCLEAR POWER STATION

P.O. BOX 618, NORTH COUNTRY ROAD • WADING RIVER, N.Y. 11792

JOHN D. LEONARD, JR.
VICE PRESIDENT - NUCLEAR OPERATIONS

JAN 31 1986

SNRC-1231

Dr. Thomas E. Murley
Regional Administrator
Office of Inspection and Enforcement
Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

Routine Safety Inspection 50-322/85-42
Shoreham Nuclear Power Station
Docket No. 50-322

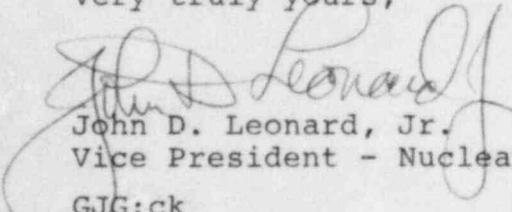
Reference: Letter from NRC (Harry B. Kister) to LILCO
(J. D. Leonard) dated January 2, 1986,
including Appendix A, Notice of Violation,
and NRC Inspection Report 50-322/85-42

Dear Dr. Murley:

The attached information (Attachment I) is being forwarded in response to the reference letter. This attachment addresses the subject notices of violation in accordance with NRC instructions.

Should you have any questions, please contact this office.

Very truly yours,


John D. Leonard, Jr.
Vice President - Nuclear Operations

GJG:ck

Enclosure

cc: J. A. Berry
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RESPONSE TO NOTICE OF NRC VIOLATION A

Violation

10 CFR 50, Appendix B, Criterion V, and Shoreham FSAR Section 17.2.5 require that activities affecting quality be prescribed by, and accomplished in accordance with, appropriate instructions, procedures, or drawings. Technical Specification 6.8.1 requires that written procedures shall be established, implemented, and maintained for various activities involving plant operations.

Contrary to the above, on November 7, 1985, maintenance work on the Residual Heat Removal System Pump 'B' Suppression Pool Suction Valve (MOV-31B) was conducted without adequate procedures in place to ensure that Suppression Pool level was below the suction line elevation. Due to this lack of procedure, approximately 3500 gallons of potentially radioactive suppression pool water was spilled into the Reactor Building. This is a Severity Level IV violation (Supplement I).

LILCO's Response

The Long Island Lighting Company acknowledges the occurrence of the event of November 7, 1985. Shoreham Plant Management has performed a detailed investigation of the event and concluded that it resulted from a combination of personnel error and a procedure that did not cover certain unanticipated evolutions which might occur during plant maintenance and operation (ie., work on several systems requiring different water levels). The individuals involved in this event should have been more investigative with respect to the evolution in question. They were in fact asked by the maintenance forces whether the water had been lowered. It had been lowered for a previous maintenance activity but was two inches too high for a larger diameter pipe. LILCO has taken the following necessary and positive steps to prevent this event from recurrence.

1. Corrective Steps Which Have Been Taken and the Results Achieved

- a) The Operating Engineer immediately issued a verbal directive instructing Control Room personnel to lower suppression pool water level to a conservatively low level (-48" or less) prior to releasing work on suppression pool suction valves.
- b) The Operators involved were counseled on this event.
- c) A report which detailed the circumstances leading up to this event has been sent to the Training Division for incorporation into the required reading program for all plant disciplines. This report was also included in Operations Section Night Orders the day following the incident.

d) A cautionary statement (similar to the Operating Engineer's directive) was added to Section 8.1.7 "Suppression Pool Pump Down Mode", of Station Procedure 23.708.01. This procedural revision will reinforce the training described in item (a) above and when fully implemented will prevent recurrence.

2. Corrective Steps Which Will Be Taken To Avoid Further Violations

As noted in item 1, a report has been sent to Training and will be incorporated in the required reading program for all plant disciplines and the appropriate station procedure was revised.

3. Date When Full Compliance Will Be Achieved

Shoreham is in full compliance in regards to this violation.

RESPONSE TO NOTICE OF NRC VIOLATION B

Violation

Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained. Station Procedure SP 12.011.01, Rev. 15, Station Equipment Clearance Permits (SECPs), Step 8.1.2, requires that when preparing SECP's, the individual requesting the SECP shall complete all portions of Section 1. Additionally, Step 8.1.2.8 requires that "The drawings required to identify the boundaries for the SECP and the grid locations shall be entered here", indicating Step 8 of Section 1.

Contrary to the above, during followup of the incident cited in Part A of this Notice on November 7, 1985, the inspector noted approximately 30 examples of active Station Equipment Clearance Permits which did not have the required Step 8 of Section 1 completed. These SECP's included some written in 1984. This is a Severity Level V violation (Supplement 1).

LILCO's Response

1. Corrective Steps Which Have Been Taken And The Results Achieved

- a) All Control Room personnel have been reminded (via Night Orders) to adhere to the "shall" requirement of Station Procedures. Personnel identified as chronic offenders of the SECP procedure requirements will be subjected to disciplinary action commensurate with the offense.
- b) An internal audit program was implemented since December 1985 by the Plant Operations section. The purpose of these audits of the SECP and Lifted Lead and Jumper (LL&J) log is to identify chronic offenders and maintain compliance with station procedures. Off-shift Control Room personnel perform these audits on a weekly basis. To date, no disciplinary action has been necessary.

2. Corrective Steps Which Will Be Taken To Avoid Further Violations

- a) The procedures for SECPs and LL&Js are in the process of being revised to clarify which portions of the permit "shall" be filled out and which parts "should" be filled out. The permits themselves are being revised so that personnel authorized to sign sections of these permits will be able to easily differentiate the requirements versus the recommendations. The revised permits (forms) will be issued as part of procedure revisions. This action will be implemented by the end of the first quarter of 1986.

3. Date When Full Compliance Will Be Achieved

Full compliance will be achieved by March 31, 1986 through an aggressive internal audit program, increased awareness of the importance of adherence to Station Procedure requirements, and through the establishment of forms which clearly indicate the information required to implement the Station Equipment Clearance Permit Program.