



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

Enclosure 2

SAFETY EVALUATION REPORT  
DOCKET NO. 50-309  
MAINE YANKEE ATOMIC POWER PLANT  
GENERIC LETTER 83-28, ITEM 2.2 (PART 1)  
EQUIPMENT CLASSIFICATION  
(PROGRAMS FOR ALL SAFETY-RELATED COMPONENTS)

INTRODUCTION AND SUMMARY

Generic Letter 83-28 was issued by the NRC on July 8, 1983, indicating actions to be taken by applicants and licensees based on the generic implications of the Salem ATWS events. Item 2.2 (Part 1) states a staff position which requires licensees and applicants to describe their program for ensuring that all components of safety-related systems necessary for accomplishing required safety functions are identified as safety-related on informational and procedural materials. The licensee's submittal is required to specifically describe five sub-items pertaining to (1) the criteria for identifying components as safety-related; (2) the information handling system used to identify safety-related components; (3) the way in which station personnel use the information handling system; (4) the management controls used to verify that the procedures for preparation, validation and utilization of the information handling system have been followed; and (5) specifications for procurement of safety-related components.

The licensee for the Maine Yankee Atomic Power Plant submitted a response to Item 2.2 (Part 1) of Generic Letter 83-28 by letter dated November 10, 1983. Our evaluation of this response finds it to be acceptable.

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## EVALUATION

The licensee identifies a subset of controlled plant drawings as the informational source for identifying safety-related components. These drawings are used to determine the safety classification for safety-related activities.

The licensee's response to the five sub-items of Item 2.2 (Part 1) will be individually discussed and the five then considered in combination.

### 1. Criteria For Identifying Safety-Related Components

The licensee's response states that the criteria for determining safety-related structures, systems, and components are contained in ANSI Standard N18.2 for mechanical systems, components and structures and in IEEE Standards 279 and 308 for electrical systems and components.

### 2. Information Handling System

The licensee's submittal identifies a designated subset of controlled plant drawings as the information system used to determine the safety classification of safety-related plant systems and components. Early

in plant operation, Maine Yankee developed this subset of drawings. Identification of safety classification was performed by Maine Yankee engineering personnel familiar with the details of plant design. The drawings were independently reviewed by the Nuclear Services Division (YNSD) of Yankee Atomic Electric Company. These drawings are revised, reviewed and approved in accordance with administrative controls when design changes are implemented, then reissued on controlled distribution.

3. Use of The Information Handling System

Nonrepetitive activities, like plant repairs and design changes are governed by general safety-class procedures. These procedures require a determination of the safety classification of systems and components being worked on in the initial stages of carrying out the repair or change procedure. When it is determined that safety-class components are involved, this safety classification information is propagated forward through all subsequent activities, which are conducted in accordance with safety-class procedures based on the quality assurance plan.

Repetitive activities, like surveillance, are governed by specific procedures which have been safety classified during the process of development. In both repetitive and nonrepetitive activities, safety classification is based on the information handling system. For non-repetitive activities, the drawings are utilized in accordance with procedure 0-00-4; this procedure is used in conjunction with other procedures to determine the safety



classification of the activities. For repetitive activities, the drawings are used in accordance with procedures 0-00-4, 0-06-1 and 0-06-2 to ensure the correct safety classification.

4. Management Control

Procedures which govern the utilization, validation, and preparation of the information handling system provide for independent review and approval of safety-related activities. These reviews and approvals are conducted by engineering and/or quality assurance personnel depending on the specific task.

In addition to the engineering and quality assurance reviews, Maine Yankee utilizes a three tiered system of audits, surveillances and inspections to monitor activities. Drawing control and updating is audited annually and portions may be covered in more than one audit. Surveillance is performed on a random basis and includes drawing control. Inspections of design changes include verifying as-built configurations to the job drawings. A final review of the design change documentation package is performed by quality assurance personnel.

5. Procurement Specifications

Procurement documents indicate the safety class, seismic qualification, and environmental qualification levels for the items to be procured. The procurement procedure requires that the specific qualification

criteria and standards for demonstrating satisfaction of the criteria be transmitted in writing to the vendor. Vendors are required to provide written proof that demonstrates the criteria are met in accordance with the specified standards.

The vendor's conformance with the qualification criteria is documented by qualification statements and reports which have been previously reviewed or are reviewed in receipt inspection by quality assurance personnel. Safety class components are purchased from vendors who have approved quality assurance programs which contain appropriate provisions for design verification. Maine Yankee audits these vendors for compliance with the quality assurance program.

Our review of the licensee's responses to the five sub-items of Item 2.2 (Part 1) of Generic Letter 83-28 finds that the licensee has an adequate program to classify and document safety-related components and to utilize this documentation for safety-related activities, including repair, maintenance, surveillance testing and procurement.

#### CONCLUSION

Our review of the licensee's responses to Item 2.2 (Part 1) of Generic Letter 83-28 for the Maine Yankee Atomic Power Plant finds that the licensee has an

adequate program for classifying safety-related components and for controlling safety-related activities. We find the licensee's responses are consistent with the staff position of the generic letter and are acceptable.