ENCLOSURE



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

# SAFETY EVALUATION REPORT VIRGIL C. SUMMER NUCLEAR STATION DOCKET NO. 50-395 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 Salen 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 handing 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 Virgil C. Summer Nuclear Station submitted responses to Generic Letter 83-28, Item 2.2.1 in submittals dated November 4, 1983 and April 1, 1987. We have evaluated these responses and find that they are acceptable.

# 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

<u>Guideline</u>: 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 states that the classification criteria used to determine whether a structure, system, or component is safety-related are described in Section 3.2 of the FSAR. Section 3.2.1 of the FSAR states that the designation of structures, components, and systems as Seismic Category 1 is in conformance with the recommendation of Regulatory Guide 1.29 for balance of plant. Components and systems within the scope of the nuclear steam supply system (NSSS) vendor satisfy the requirements of ANSI N18.2, 1973. Electrical components are classified as either Class 1E as defined in IEEE Std.-380-1975 or as non-nuclear safety (NNS).

# Conclusion:

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

## 2. Information Handling System

<u>Guideline</u>: 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:

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The licensee's response describes the Computerized History and Maintenance Planning System (CHAMPS) as the computerized method of listing that is used to identify safety-related components. Technical Services Procedures exist which govern the development and validation of the information handling system, and Station Administrative Procedures exist which address the applications and maintenance of CHAMPS.

# Conclusion:

We conclude that this response and the licensee's program satisfies the staff's concern and is acceptable.

# 3. Use of Information Handling System

<u>Guideline</u>: 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 response describes plant procedures which govern safetyrelated activities such as those described above. When activities defined in the introduction to 10 CFR 50, Appendix B, are to be performed, both the organization which will perform an activity and the Quality Services organization verify proper classification of work procedures. This is performed by checking approved design documents thus assuring procedures appropriate to the safety classification are used. At this time, work or procurement package documentation is also reviewed for compliant to the design documents, FSAR, approved drawings, etc. If the safety classification of the affected components cannot be clearly determined, a disposition concerning the subject activity is provided by Engineering. The licensee's response further states that Nuclear Operations Department procedures exist which govern the application and handling of safety-related activities. These procedures require that safety classification be made prior to performing work.

# Conclusion:

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We conclude that the procedures described in the licensee's response meet the staff's position and is acceptable.

# 4. Management Controls

<u>Guideline</u>: 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 the management controls utilized to verify that the procedures utilized in performing activities associated with safety-related components are as specified in FSAR Chapter 17, in Section 6 of the Technical Specifications, and described in the Operational QA Plan and associated procedures. These controls consist primarily of QA audits and surveillances.

# Conclusion:

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We conclude that this response addresses the staff's concern and is acceptable.

# 5. Design Verification and Procurement

<u>Guideline</u>: 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's response states that procurement documents for safety-related replacement equipment or parts contain the technical requirements, including design verification and qualification testing. The entire purchase requisition package is reviewed by QA prior to a purchase order being placed. If parts or equipment which have been procured via nonsafety-related purchasing procedures are needed for use in a safety related application, they are dedicated in accordance with criteria established by Engineering and reviewed by QA before they can be installed. These processes are described in appropriate procedures.

#### Conclusion:

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

# 6. "Important To Safety" Components

<u>Guideline</u>: 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 4, 1983 and April 1, 1987. These submittals describe the licensee's program for identifying and classifying safety-related equipment. and components which meet the staff's 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.

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