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

SNRC-1573

MAR 31 1989

Mr. William T. Russell
Regional Administration
U.S. Nuclear Regulatory Commission
Region 1
475 Allendale Road
King of Prussia, PA 19406

Operational Readiness Assessment
Team Inspection
Shoreham Nuclear Power Station - Unit 1
Docket No. 50-322

Reference (1): LILCO letter (NED-89-0829) from Robert M. Kascsak, Manager, Nuclear Engineering Department to Thomas Koshy, Lead Reactor Engineer, Region I Engineering Branch, dated March 27, 1989; subject: Follow-up Information to NRC Inspection March 15 - 23, 1989

Dear Mr. Russell:

At the exit meeting of the subject inspection, a number of issues were discussed. These are identified below along with our proposed actions to resolve them.

LILCO Personnel

The subject of transition from consultant to permanent LILCO personnel is being addressed concurrently by separate letter to you.

Rosemount Transmitter Conduit Seals

During its inspection, the NRC identified the manner in which the Rosemount transmitters were sealed against moisture intrusion as a open equipment qualification issue. LILCO submitted a letter to the NRC (Reference 1) that contained a commitment to resolve this matter quickly and to demonstrate our responsiveness to the concerns of your staff. This commitment entails the installation of qualified seals, in a manner consistent with the description in reference (1), on Rosemount transmitters and other instruments

IE01
1/0

in the secondary containment requiring a similar seal. Our understanding is that your staff is in concurrence with this approach and therefore we are proceeding on that basis. This action will be completed prior to startup.

Motor Operated Valve (MOV) Limit Switch Separator Plate

During the inspection, the NRC Staff questioned the environmental qualification of poly-vinyl-chloride coated aluminum plates in limit switch compartments of MOV actuators. At issue was the adequacy of analysis and supporting test data to demonstrate the ability of this configuration to maintain structural integrity under accident conditions. Reference (1) provided the NRC Staff with further analysis to support qualification and a commitment to further testing. In subsequent conversations, this issue has been resolved to the satisfaction of inspection team members by LILCO's commitment to remove the separator plate from valves located inside primary containment prior to startup. This modification will be supported by an appropriate safety evaluation. During these conversations, LILCO and the NRC Staff also agreed that the analysis in reference (1) was sufficient to qualify the plate for use outside the primary containment.

ASME Bolting Review

LILCO identified an instance where ASME Class 2 bolting material was used in an application that called for ASME Class 1 material. An investigation determined that the potential existed for installing incorrect bolts in ASME applications when performing work under a Maintenance Work Request (MWR). LILCO is currently in the process of taking corrective action by conducting an evaluation of ASME Code Class 1, 2 and 3 joints where our records indicate the potential for inappropriate bolting exists. Inappropriate bolts identified during this evaluation will be replaced with bolts meeting the specified requirements. Additionally, LILCO is modifying station procedures and initiated training to ensure ASME bolting requirements are maintained in the future.

LILCO is committed to completing the ASME bolting corrective actions and having documentation to demonstrate this prior to startup.

Repetitive Corrective Maintenance

During the inspection, the NRC requested that repetitive corrective maintenance on components (i.e., a similar repair 3 or more times) be identified, and a review conducted to determine whether or not equipment with a chronic maintenance problem could present a safety impact. The agreed upon period of review was the past three (3) years. The NRC also requested that this type of review be added as a standard feature of our maintenance program.

LILCO is currently reviewing a computer printout of repetitive Maintenance Work Requests (MWRs) dating back to March 28, 1986. Multiple incidences of corrective maintenance on the same component will be identified and reviewed to determine if a potential for common cause failure exists which would require more basic corrective action rather than maintenance; such as a change in material or an engineering design change. This activity will be completed prior to startup.

LILCO has completed modification of its Maintenance Program to require the routine identification and evaluation of repetitive MWRs.

Priority of Maintenance Work Request (MWRs)

During the inspection, the NRC Staff requested that LILCO complete or provide justification for not completing Priority 1, 2, and 5 MWRs prior to startup and assure that no Priority 2 MWRs have been misidentified as Priority 3. LILCO establishes priorities in accordance with the criteria described in Section 8.2.3 of Station Procedure 12.013.01 entitled "Maintenance Work Requests.

The review of the seventeen (17) Priority 5 MWRs is complete. LILCO's review of Priority 1 and 2 MWRs is currently underway and will be completed prior to startup. Documentation providing justification of why a particular MWR need not be completed prior to startup will be available upon completion.

Priority 3 MWRs have been reviewed to ascertain whether they have been classified correctly. One Priority 3 MWR associated with the service water system has been reclassified to Priority 2 due to scheduling considerations.

LILCO will keep the Resident Inspector apprised of progress on these items and upon completion will provide him the necessary documentation needed to confirm our actions.

Please do not hesitate to call my office or members of my staff should you require additional information or clarification regarding these issues.

Very truly yours,

John D. Leonard, Jr.

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

LFB:ck

cc: S. Brown
Document Control Desk
F. Crescenzo