



Long
Island
Power
Authority

Shoreham Nuclear Power Station
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LSNRC-2030

Mr. Thomas T. Martin
Regional Administrator
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA. 19406

Long Island Power Authority's Evaluation
for NRC Inspection Item 50-322/92-04-02
Shoreham Nuclear Power Station - Unit 1
Docket No. 50-322

- Ref: 1) USNRC letter dated December 2, 1992 to L. M. Hill from E. C. Wenzinger; subject: NRC Inspection Report NO. 50-322/92-04.
- 2) Long Island Power Authority (L.M. Hill) letter LSNRC-2013 dated December 14, 1992 to U.S. Nuclear Regulatory Commission (Document Control Desk); subject: License Change Application #1.
- 3) Safety Evaluation by the Office of Nuclear Reactor Regulation Related to Amendment No. 7 to Facility Operating License No. NPF-82.

Dear Mr. Martin:

The purpose of this letter is to provide the NRC with LIPA's evaluation of unresolved item 92-04-02 and to describe the action LIPA plans to take in response to this unresolved item. As described in NRC Inspection Report No. 50-322/92-04, an inspection of Long Island Power Authority's (LIPA) fire protection and prevention program resulted in unresolved inspection item 92-04-02. This item concerns the fact that the LIPA technical specifications require one emergency diesel generator to be operable when handling fuel in the secondary containment, but the limiting conditions and surveillance requirements for fire protection equipment in the vicinity of the emergency diesel generators (EDGs), the emergency switchgear, and the batteries had been deleted from the Fire Hazards Analysis Report (FHAR). The inspection report also stated that this item remains unresolved pending the licensee's evaluation of this condition.

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The following evaluation stands on its own merits and justifies the changes to the Fire Protection Program, but it is important to point out that on December 14, 1992, LIPA submitted a license change application (Ref. 2) that requests deletion of the technical specification requirements for A.C. Sources and Onsite Power Distribution Systems. This request is based primarily on the absence of any safety-related functions for the A.C. Sources and Onsite Power Distribution Systems.

Evaluation

On June 20, 1991, the NRC issued a possession-only-license for the Shoreham Nuclear Power Station to the Long Island Lighting Company (LILCO). LILCO, which at that time was the licensee for Shoreham, implemented the new license on August 7, 1991. At the same time, the recommended action of Generic Letter 88-12, Removal of Fire Protection Requirements from the Technical Specifications, was implemented and the fire protection program requirements were transferred to the Fire Hazard Analysis Report (FHAR). Also at that time, these fire protection program (FPP) requirements were revised based upon the reduced safety classification of systems, structures and components specified in the Defueled Safety Analysis Report (DSAR). This revision to the FPP requirements consisted of the following:

1. The FPP requirements for non-safety related areas including the EDGs, emergency switchgear and batteries were deleted from the FHAR and, if applicable, corresponding preventive maintenance (PM) activities were created to replace them.
2. The new PM activities were based upon applicable National Fire Protection Association Code requirements and/or property loss prevention standards.
3. The affected surveillance procedures were converted to PM procedures. Limiting conditions, however, were not developed because of the absence of safety-related functions.
4. Station Procedure 12.015.01, Preventive Maintenance Program, was revised by the addition of a requirement which states that "FPP preventive maintenance activities shall only be deferred, deleted or deactivated with the concurrence of the Fire Protection Program Manager".

This revision to the FPP requirements was conducted in accordance with 10CFR50.59. This revision also ensured that the commitment in Section 9.5.1.1 of the DSAR was complied with. This commitment states:

Structures, systems, components and administrative controls in place to protect areas, equipment or circuits previously identified as safety related will be maintained as required for property loss prevention purposes and should be considered the same as those fire protection features described in the USAR for protection of non-safety related areas.

Finally, it was demonstrated that this revision complied with license condition 2.D. This license condition states:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if these changes would not adversely affect the ability to maintain the fuel in the spent fuel pool in a safe condition in the event of a fire.

Specifically, an EDG does not perform any safety-related functions and is not needed to maintain the fuel in the spent fuel pool in a safe condition in the event of a fire. In fact, the technical specification bases for the A.C. Sources Limiting Condition states that these systems do not perform safety related functions. As stated in Section 8.1.4 of the DSAR, a non-safety related EDG will provide backup AC power during fuel handling in the secondary containment. Furthermore, an analysis of the loss of AC power is presented in Section 15.1.19 of the DSAR. This analysis showed that the EDGs are not required to prevent or mitigate any of the accidents applicable to the defueled condition of the plant, including fuel damage events.

The limited EDG function is further clarified in the NRC Staff's Safety Evaluation (Ref. 3) of the LILCO Possession Only License application and DSAR. On page 7 of the safety evaluation, the Staff discusses an agreement reached between LILCO and the NRC which resulted in the specification for one EDG when handling irradiated fuel in the Reactor Building. The discussion states that "...the licensee [LILCO] and Staff concluded that the specification for one EDG operable during irradiated fuel movement provides additional flexibility in case of a potential loss of electrical power event." No other EDG function was indicated.

Furthermore, the NRC has acknowledged the nonsafety-related classification of the EDGs by footnoting the technical specifications to permit the use of commercial grade parts. It is clear from the above that any degradation in the level of fire protection for the operable EDG (if it occurred) would not adversely affect the ability to maintain the fuel in a safe condition in the event of a fire. Such degradation would result, at most, in slightly increased vulnerability of a component whose sole function is to provide operational flexibility in an unusual situation.

As noted in the inspection report, the above change to the FPP requirements was only implemented after completion of the extensive review and approval process defined in LILCO procedure NOSD 6.1, Control of Updated Safety Analysis Report Changes. The personnel involved in this process included the LILCO Plant Manager, Nuclear Engineering Department Manager, Nuclear Quality Assurance Department Manager, Nuclear Licensing and Regulatory Affairs Manager, Fire Protection Program Manager, Corporate Fire Protection Engineer, the Review of Operations Committee and the Nuclear Review Board. LIPA concurs with the basis for this change.

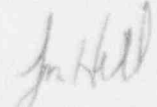
Conclusion

LIPA believes that its FPP requirements, whether performed as FHAR surveillances or as PM activities, are appropriate, based upon the safety classification of systems, structures and components. LIPA will continue to comply with the commitment in the DSAR concerning fire protection features for non-safety related areas. Finally, since the EDGs do not perform a safety related function and are not necessary to support the safe storage and handling of fuel, LIPA submitted, on December 14, 1992, a license change application which requested the deletion of the technical specification requirements on A.C. Sources and on Onsite Power Distribution Systems (Reference 2).

Based on the above, LIPA does not plan to revise the FHAR surveillance requirements in response to unresolved item 92-04-02.

Should you have any questions or require any additional information, please do not hesitate to contact me or appropriate members of the Shoreham Decommissioning Project team.

Very truly yours,



L. M. Hill
Resident Manager

RAP/ab

cc:	L. Pittiglio	(NMSS)
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