



LONG ISLAND LIGHTING COMPANY

175 EAST OLD COUNTRY ROAD • HICKSVILLE, NEW YORK 11801

MILLARD S. POLLOCK
VICE PRESIDENT - NUCLEAR

SNRC-843

February 19, 1983

Mr. Richard W. Starostecki, Director
Division of Project and Resident Programs
U.S. Nuclear Regulatory Commission, Region I
631 Park Avenue
King of Prussia, PA 19406

NRC Inspection No. 83-02
Shoreham Nuclear Power Station, Unit No. 1
Docket No. 50-322

Dear Mr. Starostecki:

This letter responds to your letter of January 21, 1983, which forwarded the report of your Special Team Inspection conducted by NRC I&E Region I representatives on January 10th - 15th, 1983 at the Shoreham Nuclear Power Station of activities authorized by NRC License No. CPPR-95. Your letter requested confirmation of certain LILCO commitments made during the subject inspection and also required a response to activities apparently not conducted in full compliance with NRC requirements.

Your letter stated that certain NRC open items identified by asterisks (*s) in table 1 of I&E Inspection Report 83-02 must be closed prior to a recommendation by NRC Region I to the Licensing staff that Shoreham's Operating License be granted. We have reviewed all of the activities thus referenced and believe that all of these items will be satisfactorily resolved in the time frame permitting NRC closure prior to Fuel Load. We therefore take no exception to the required closure schedule for these items.

As discussed during the subject inspection, and confirmed via NRC letter CAL 83-01 dated 1/19/83, LILCO has made a number of specific commitments in the housekeeping area. These commitments have been implemented and will continue to be implemented through the completion of Construction of the Plant. We therefore reaffirm this commitment as requested in your letter.

We also reaffirm our commitment to implement additional measures in the Construction and FQC Final Inspection Programs as delineated on W. J. Museler's memo of 1/17/83 to J. Higgins, NRC Resident Inspector. These additional measures were also discussed at the official NRC Exit meeting relative to I&E Inspection 83-02

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on 1/25/83, and also during subsequent discussions with I&E Region I representatives. We believe that these measures will effectively enhance the Final Inspection Programs and provide additional confidence in the ultimate quality of Plant hardware. We plan to review the results of these additional measures, termed "Quality Accountability Program" with your representatives on an ongoing basis.

With respect to the violations identified in Appendix A of your letter, we are providing in this letter preliminary responses to these violations including all available data which we have been able to review up to the present time. As discussed with your Mr. E. Greenman on 2/18/83, we will provide additional data, especially in the areas of corrective and preventative action, by March 7, 1983. The reason we have requested additional time to respond fully to this area of your Inspection Report is that we have initiated a number of field reinspection and engineering evaluation efforts in order to ensure that all aspects of the NRC's concerns for each of the specific items is properly and thoroughly addressed. These efforts are not yet complete as of the date of this letter.

The following preliminary responses to your inspection findings therefore should not be considered as representing our final evaluations of these situations. The data provided, however, is accurate, and we do not believe that anything presented herein will be modified in our final response.

A. Apparent Noncompliance with 10CFR50
Appendix B Criterion V, FSAR Section
17.1.5A

10CFR50, Appendix B, Criterion B, Criterion X, and the Shoreham FSAR Section 17.1.10A require that inspections shall be performed to verify conformance of completed construction activities to documented instructions, procedures, and drawings. Further, 10CFR50, Appendix B, Criterion V, and the Shoreham FSAR Section 17.1.5A require that activities affecting quality shall be accomplished in accordance with documented instructions, procedures and drawings.

Contrary to the above, as of January 13, 1983:

- (1) Completed and final Quality Control (QC)-accepted welds on control rod drive hydraulic piping supports did not conform to drawing requirements in that the fillet weld for a hanger at one of the reactor vessel pedestal blockouts did not meet the leg size requirements for ASME III Subsection NF welds.
- (2) Completed and final QC-accepted hangers in the Residual Heat

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(2) (Continued)

Removal System did not conform to drawing requirements in that:

- the torque on the high-strength bolts for support Ell-PSA-109 exceeded design requirements; and
- the contact bearing between the lugs and pipe clamps for supports Ell-PSSH-173 and Ell-PSSH-184 was insufficient.

(3) Completed and final QC-accepted cable tray supports did not conform to drawing requirements in that the braces for supports RB100B, RB208A and RB131 were not installed per the support drawings.

Preliminary Response

The three (3) parts of paragraph A of Appendix A will be addressed separately.

(1) Welds on CRD Piping Supports

In this specific instance, the NRC Inspector noted Reactor Controls, Inc., welds on control rod drive hydraulic line supports which were completed with fit-up gaps. The welds were performed and inspected to drawings which did not specify a gap requirement. When the weld was inspected, the Inspector, as had the welder, believed the gap was allowable.

The cause of this situation appears to be the lack of specificity with respect to the gap requirement. Beyond that all steps in the process were correct. Preliminary engineering analysis indicates that allowable stress levels may be exceeded due to the existence of the gap, but that stress will not exceed yield strength, and therefore the condition would not constitute a safety hazard. More detailed analysis is being performed to determine whether or not rework will be required to ensure allowable stress levels are not exceeded. A re-inspection of one hundred (100) percent of all RCI pipe support welds of this type has been initiated. In addition, the applicable design documents are being modified to ensure no ambiguity exists for work which may be done in the future.

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(2) Completed RHR System Hangers

(a) Bolt Torque on Pipe Support Ell-PSA-109

The NRC found that two (2) bolts on a pipe support were not able to be loosened by hand when the design document called for "hand tight" conditions. Further, when the bolts were removed for correction of this perceived problem, a significant amount of force (unmeasured) was required for removal. Since this pipe support had been final inspected by FQC, the NRC concern was that additional items of this type (hand tight bolt requirements) might be present in other areas of the Plant. LILCO believes that the bolts in question were properly installed and that the Quality Assurance Program in this case did function effectively. We do not believe there was, in fact, any nonconforming condition in the field for the following reasons:

- a.1 The nuts and bolts in question had been installed for some time and the difficulty in removing the nuts can be attributed in part to normal oxidation of the mating surfaces.
- a.2 The nut in question was secured by a lock nut, and the process of installing lock nuts sometimes results in slight additional tightening of the principal nut, and therefore the appearance of tightening in excess of the "hand tightness" requirement would not be unusual.
- a.3 Field inspections conducted since this NRC inspection and subsequent to rework of those two (2) nut/bolt combinations (at three (3) different times several days apart) indicated that the reworked nut/bolt combinations have been variously "loose", "tight" and "loose" based on the time of the inspection. We therefore believe that the condition observed by the NRC Inspector is consistent with a properly "hand tight" installed nut/bolt combination under the various operating conditions that the particular pipe support is expected to experience.

It was verified by the NRC that the proper bolting material had been employed. In addition, this condition has been reviewed by engineering and judged that even if the nut/bolt had been tightened

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(2) (a) (Continued)

significantly beyond the "hand tight" criteria, the pipe support would still have functioned properly. We would emphasize, however, that we believe that the original installation was correct, and the inspections required were carried out and verified the correctness of the installation at the time of the inspection. We have further verified that there are only two (2) pipe supports of this type in the Plant.

(b) Bearing Gaps Between Lugs and Pipe Clamps

The NRC noted that there was not full contact between the lugs welded to piping (four lugs) and the pipe clamps supporting that pipe in the vertical direction on supports Ell-PSSH-173 and Ell-PSSH-184 as required by the "full bearing" provision of E&DCR F-1748S. The NRC also believed that on one (1) of the supports, only three (3) of the four (4) lugs were in contact with the pipe clamp. This observation later turned out to be invalid as subsequent FQC reinspection indicated that, in fact, positive contact was being achieved on the lug in question although there was essentially only "point" contact. The NRC was also concerned that GE criteria for GE supports delineated on E&DCR F-33350C were being used as acceptance criteria for SWEC supports instead of E&DCR F-1748S.

With respect to the issue of "full bearing" (i.e., complete surface contact between the mating surfaces), engineering has reviewed the condition and determined that "positive bearing" (meaning that each lug is, in fact, in some contact with the pipe clamp) is an acceptable condition from a technical standpoint. Further, the two (2) supports inspected by the NRC had an angled surface on the clamp where it contacted the lug. Therefore, "full bearing" is not possible without specific machining operations which were neither required nor necessary.

E&DCR F-1748S, however, did call for "full bearing", and the final inspection did not document the presence of "positive bearing" (which existed) as opposed to "full bearing" of all surfaces of the clamp/lug interface. We believe the particular FQC inspector involved found the condition acceptable based on his interpretation of the documentation package to which he was inspecting. That documentation package included prior approval granted by

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(2) (b) (Continued)

engineering for a previously identified reduced surface contact condition. This prior approval is consistent with the recent engineering review of the condition and with the overall intent of this particular design detail since the only way to achieve absolute "full bearing" would be to have machined surfaces on both parts. Therefore, the "positive bearing" requirement represents the actual engineering requirement for this configuration. In order to verify further that adequate bearing for this type of a configuration was achieved, even on supports not employing the specific clamp/lug design encountered on supports Ell-PSSH-173 and Ell-PSSH-184, LILCO is reinspecting all supports of a similar configuration for this attribute.

With respect to application of the SWEC versus the GE E&DCRs for construction and inspection of clamp/lug joints in the vertical configuration, the UNICO Supervisor originally questioned by the NRC Inspector did not fully understand the NRC Inspector's question, leading to an NRC concern that the appropriate E&DCRs had not been applied in the construction and inspection process for SWEC and GE pipe supports of this configuration. In fact, we have verified that the SWEC scope pipe supports of this configuration were installed and inspected to the appropriate document (E&DCR F-1748S) and that the GE supports of this configuration were installed and inspected to their appropriate document (E&DCR F-33350C). Objective evidence of this was obtained through review of inspection records which specifically noted these E&DCRs.

(3) Cable Tray Supports (CABTRAP) RB100B, RB208A, and RB131

This situation involves three (3) observed conditions on cable tray supports. Each will be separately discussed.

(a) RB100B

The NRC Inspector noted on the as-built drawing that on one (1) tier of a three (3) tier cable tray support, the as-built drawing showed one (1) cable tray whereas in the field two (2) cable trays were, in fact, installed. The configuration of the cable tray support was in accordance with the design documents. The as-built drawing utilized by the NRC Inspector was a new support drawing devel-

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(3) (a) (Continued)

oped in the as-built program as a result of a walkdown. During the as-built walkdown, the designer observed and recorded the second cable tray in that location, however, the draftsman who produced the final drawing omitted the second tray. Again, the cable tray support and the cable trays themselves were properly installed in accordance with appropriate design documents. The design criteria used for cable tray supports assumes maximum tray loading, therefore this support was analyzed for two (2) trays even though one (1) was shown. The as-built support drawing will be revised to reflect the second tray. In summary, no further preventive or corrective action is being initiated because the constructed condition is in accordance with the design, the occurrence has no implications with respect to the adequacy of the Plant, and we have no basis to believe that this is other than an isolated human error.

(b) RB208A

At the outset, it must be noted that the specific cable tray support involved here was correctly installed in conformance with the applicable design documents. However, the as-built drawing depicted a concrete beam on the wrong side of the support for the view (west) noted on the drawing. It should also be noted that a diagonal brace, such as the one in question, could be installed either way (going down left to right or going up left to right) and would perform exactly the same function since the seismic loading is applied in both directions horizontally to the tray support. This was a drafting error. The corrective action included a revision of the as-built drawing and a field check of twelve (12) additional cable tray supports having an east/west aspect and their associated as-built drawings. This field check disclosed no similar errors in drafting the as-built drawings. One minor drafting discrepancy in the "direction" of a section view arrow was observed and will be corrected on the as-built drawing. In addition to this, a formal training program for all FQC inspectors responsible for inspections in the electrical as-built program has been conducted. LILCO believes no further action is required.

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(3) (c) RB131

The NRC Inspector noted in this case that a diagonal brace termination was located one (1) foot above the termination point indicated on the as-built drawing and indicated on the original design drawing for this support. The brace was originally installed in the correct location. However, as a result of the CABTRAP reanalysis program, the FQC inspection identified the need to install modified hardware at the lower termination point of the brace. The correct hardware was installed, but to do so required movement of the termination point to the existing location. Since the FQC inspector reinspected this support (same inspector) for only the modified hardware called for on the previous inspection report and having already verified that the brace was in the correct location, he did not reinspect for correct location. Investigation also revealed that the brace was installed in the only possible configuration given the new hardware installation requirements.

We have confirmed by our engineering review that adjustment of the diagonal brace termination location is acceptable from an engineering standpoint. The corrective and preventive action in this instance included an engineering verification that the as-built condition was acceptable and the revision of the as-built drawing. Also we verified through interviews that personnel performing work in the field are aware of and are implementing their responsibility to obtain prior approval for deviations from specified conditions.

B. Apparent Noncompliance with 10CFR50
Appendix B Criterion XIV, FSAR Section
17.1.14A

10CFR 50, Appendix B, Criterion XIV, and the Shoreham FSAR Section 17.1.14A require that measures be established to indicate the inspection and test status of safety-related components to preclude inadvertent bypassing of such inspections and tests.

Contrary to the above, as of January 13, 1983, the measures established for tracking the status of cold set of safety-related spring hangers inside the primary containment were ineffective in that they failed to identify the cold set status of at least two (2) of these spring hangers.

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Preliminary Response

The NRC's concern was that verification of hanger cold set, specifically the pulling of the shear pin, was not being adequately verified. We reviewed this matter and have concluded that existing site programs adequately ensure that hanger cold set verification occurs at the appropriate time. For example, there is a requirement, which pre-existed the NRC inspection, to check pins pulled prior to Fuel Load. In addition, the Construction Site Inspection Program has required the inspection of the attribute to be noted on the Construction Inspection Program forms for all supports of this type in the secondary containment. We have reviewed the two (2) specific spring cans referenced in the NRC report and found them to be in the condition called for by the site programs. Thus, the observed condition was not different from the required condition, but rather was appropriate and controlled. Also, twelve (12) additional spring cans were checked and found to be in the correct configuration. (Six (6) of these had already had the cold set verified, and the other six (6) were "in process" with the shear pins still installed as required.) While LILCO considers the existing programs adequate, we agree with the NRC that a more rigorous accounting system for the cold setting of pipe supports prior to Fuel Load will be beneficial in providing additional assurance that the final configuration is correct.

Accordingly, LILCO established, effective February 2, 1983, a program composed of the following elements:

- (1) An additional CIP form (Construction Inspection Program) will be generated for each spring can in the Plant (safety-related and non-safety related) highlighting the cold setting requirement.
- (2) All hangers will be reinspected for this specific attribute prior to Fuel Load (a directive which existed prior to Inspection 83-02) and the CIP form will be filled out and forwarded to the Resident Engineering Office for inclusion in the permanent Plant files.
- (3) In addition to individual inspection forms for each spring can, an overall reverification sheet by System will be established for all spring cans in every System.
- (4) The Master Punch List has had this verification included as a line item for each System.

LILCO believes this additional precaution is acceptable to the NRC and that no further action is required in connection with this matter.

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C. Apparent Noncompliance with 10CFR50
Appendix B Criterion V, FSAR Section
17.1.5A

10CFR50, Appendix B, Criterion V, and the Shoreham FSAR Section 17.1.5A require that activities affecting quality shall be accomplished in accordance with documented instructions, procedures, and drawings.

- (1) Stone and Webster QC Procedure QC15.4, Revision A, requires that construction notify QC whenever their work activity affects final QC accepted items.

Contrary to the above, as of January 13, 1983, construction did not notify QC prior to working on safety-related platform number 21 in the secondary containment, and on Main Steam Line Restraint number 30 within the primary containment.

- (2) Engineering Assurance Procedure 6.3, Revision 3, requires that the cover sheets of Engineering and Design Coordination Reports (E&DCRs) specify all drawings affected by these reports.

Contrary to the above, as of January 10, 1983, the cover sheets for safety-related E&DCRs F-39112 and F-39190 did not specify that drawing number 1.61-207 was affected by these E&DCRs.

- (3) Checkout and Initial Operations Test Procedure CG 000.007-5 requires that any discrepancy found between the circuitry tested and the latest applicable vendor logic or elementary diagrams be noted.

Contrary to the above, no discrepancy had been noted in elementary diagram 1.61-207F although testing conducted per CG 000.007-5 on the Yellow Line Master Drawing 1.61-207E indicated that E&DCRs F-39112, and F-39190 had been incorporated into Reactor Core Isolation Cooling System circuitry.

Preliminary Response

Paragraph C of Appendix A notes that the Inspectors observed the following conditions:

- (1) Construction did not notify QC prior to working on safety-related platform number 21 in the secondary containment, and on Main Steam Line Restraint number 30 within the primary containment.

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- (2) The cover sheets for safety-related E&DCRs F-39112 and F-39190 did not specify that drawing number 1.61-207 was affected by these E&DCRs.
- (3) No discrepancy had been noted in elementary diagram 1.61-207F although testing conducted per CG 000.007-5 on the Yellow Line Master Drawing 1.61-207E indicated that E&DCRs F-39112 and F-39190 had been incorporated into Reactor Core Isolation Cooling System circuitry.

Each of the observed conditions will be addressed separately.

- (1) A portion of the quality assurance program requires construction to advise FQC of work being performed after FQC has inspected previous work. This is true in the case of both in-process and final inspection. Under this procedural control, construction advises FQC by submittal of an appropriate notification form. This is a redundant procedural control over and above the direct receipt by FQC of any document which directs work to be performed at the Plant which must ultimately be inspected by FQC.

In the specific instances raised in this portion of the violation, the work involved was structural steel activity. In one (1) case, platform 21 in the secondary containment was being modified, and, in the second case, additional structural steel in the form of a monorail was being attached to a Main Steam Restraint (MSR-30). LILCO agrees that in these instances a notification form should have been submitted to FQC but was not. In each case, however, notification was achieved through the delivery to FQC of the documents to which the work was being performed. These documents would have triggered additional inspection by FQC. In addition, the final inspection remained for the installations in both activities in question. Although the notice of violation indicates that this procedure is used whenever work activity affects final QC-accepted items, the procedure applies, as we have stated, following completion of both in-process and final QC inspections.

In these cases, the notification forms were not submitted by construction as the construction force was not aware that FQC inspections had been performed on these items. In the structural steel area, in-process inspection is an ongoing activity and no formal notification of completed inspections is required to be submitted to construction by FQC. In the case of the attachment of a monorail to the Main Steam Restraint, the structural steel monorail attachment to the restraint was not part of the restraint and came under a separate, new inspection which would assure that both the monorail was properly installed, and the restraint continued

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(1) (Continued)

to be acceptable after installation of the monorail. The monorail installation was a new and separate component requiring full FQC inspection after completion of the work. However, a notification form should also have been filled out in this case.

To facilitate identification of work which requires notification to FQC, FQC has initiated a procedure which requires the tagging of all items which have received FQC inspections as well as formal notification to the construction organization. This will allow for more positive determination by construction of the need for a notification form when work is conducted.

- (2) We have evaluated the situation involving E&DCRs F-39112 and F-39190 and have determined that the appropriate document control program requirements were applied and functioned properly. These E&DCRs did list the correct affected drawing numbers on them. The referenced drawings were multiple sheet drawings, and the E&DCR properly noted only the SWEC number of the first sheet. Accordingly, no corrective or preventive action is required.

- (3) The NRC's concern was the apparent failure of the responsible test engineer to note, as a discrepancy, the fact there were outstanding E&DCRs not posted on the drawing being used for the test. In fact, the E&DCRs were correctly posted on the first sheet of a multi-sheet drawing (Revision E) being used by the test engineer. Thus, there was no discrepancy to note. The Inspector identified on site a later revision (Revision F) which was issued after the test and which did not have the E&DCRs incorporated. The E&DCRs were issued after Revision F and were correctly posted on the first sheet of the Revision F drawing, as they had been on the Revision E drawing of record for the test. Revision G was issued on December 4, 1982, in Boston, and was in transit to the site at the time of the inspection. This revision does incorporate the E&DCRs in question. Therefore, no corrective or preventive actions are required.

D. Apparent Noncompliance with 10CFR50
Appendix B Criterion X, FSAR Section
17.2.10

10CFR50, Appendix B, Criterion X and the Shoreham FSAR Section 17.2.10 require that inspection of activities affecting quality be conducted to verify conformance with the documented

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instructions and drawings. The LILCO Quality Assurance Manual in Section 10 scopes the requirements for plant inspections, delegating responsibility to the Operational Quality Assurance (OQA) Section to perform inspections of repaired and reworked items to the criteria in applicable codes, drawings and specifications. Further, 10CFR50, Appendix B, Criterion V, and the Shoreham FSAR Section 17.2.5 require that activities affecting quality shall be accomplished in accordance with documented instructions, procedures and drawings.

Contrary to the above, as of January 14, 1983, the inspection conducted on "A" Diesel Generator turbocharger support repair/rework R43-458 failed to verify conformance with instructions, drawings, and applicable codes in that OQA inspected and accepted work with the following nonconforming conditions in existence:

- (1) a tubular support weld varied from its design drawing detail because it failed to wrap around the entire fit-up joint, as required;
- (2) a welding technique used in the rework was not qualified for the angular orientation encountered in the field; and
- (3) high-strength bolting installations did not conform to applicable AISC Code requirements in that several bolted joints had their washers missing and ASIM A-490 bolts in these installations had been retorqued.

Preliminary Response

Conditions 1 and 2 are essentially the same and will be treated together, and condition 3 will be treated separately.

- (1) Conditions 1 and 2 are the same condition resulting directly from the physical configuration of the joint. This situation involved a tubular support attached to a flat surface at a sharp angle, resulting in a small area that was unweldable due to lack of accessibility. A four-sided weld was called for using a technique suitable for either three-sided or four-sided welding depending on the angle of the joint. The weld was performed to the extent possible considering the inaccessibility of the small angle portion of the installation. The inspector accepted the weld because he did not observe the small amount (approximately $\frac{1}{2}$ ") of weld material missing. This has been confirmed in an interview with the inspector. The weld technique which had been used in the field was qualified for the orientation except that it could not be used in the area where the setup angle was less than thirty (30) degrees. The weld could not be performed in full compliance with the drawing because of the

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(1) (Continued)

accessibility considerations. Actual installation resulted in an angle of less than thirty (30) degrees. As we now know from the evaluation, a full, four-sided circumferential weld is not required for this support member. Had engineering known that field adjustment would result in less than thirty (30) degrees, a three-sided weld would have been called for using the same weld technique, which is in fact the final installation achieved. This was an isolated instance of an inspector failing to observe a small amount of missing weld. Only two (2) other welds of this type exist, and, in the remaining two (2) cases, the angle was greater than thirty (30) degrees, making the joint fully accessible. The installation matched exactly the engineering requirements in these two (2) additional cases.

The corrective and preventive action required for these two (2) conditions was to confirm by engineering review that the small amount of weld material missing was acceptable. No rework was required. All documentation will be conformed to the actual installation. Additional corrective and preventive actions included review of the other two (2) similar installations which were found to be correct. This matter has been thoroughly discussed and reviewed with the inspector and the welder. As a result of this interview with the inspector, it was apparent that the inspector was aware of the requirement for a full circumferential weld and conducted his inspection to that requirement, but simply missed it. The welder, who had performed a number of welds of this type, thought he had satisfactorily completed this weld. Further, when asked, the welder stated that he was familiar with and complied with the requirement to obtain engineering approval for deviations from design drawings. Accordingly, we believe this to be an isolated instance.

- (2) The third condition in paragraph D of Appendix A involved specific high-strength bolting installations where washers were not used as required by the applicable Code and where bolts were retorqued. We have reviewed all work done by the startup support personnel and have confirmed that this was the only instance where they were required to use high-strength bolting material on hangers. This high-strength bolting material is used in only a few locations throughout the Plant. For example, we reviewed two hundred fifty (250) pipe supports for this condition and found only three (3) instances where A-490 bolts were called for and used, and in these three (3) instances the bolting configuration was confirmed to be correct. We have re-

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(2) (Continued)

viewed the site programs for this type of bolting material and performed additional field inspections and ascertained that this was an isolated instance limited to these three (3) particular turbocharger supports. It should be noted, however, that an engineering review of these conditions (both the absence of washers and the retorquing) was performed and the adequacy of the support confirmed notwithstanding the discrepant conditions noted by the NRC.

The corrective and preventive action for these conditions is to install new bolts and washers in the turbocharger support. By additional training, startup support personnel and OQA inspectors will be informed of this specific requirement relating to A-490 high-strength bolts.

Date of Full Compliance

Specific dates by which full compliance will be achieved for each of the violations identified in Appendix A and responded to above will be supplied in our supplemental response of March 7, 1983. However, at this time we believe that full compliance for all items will be achieved by May 1, 1983.

Very truly yours,

M. S. Pollock

M. S. Pollock
Vice President-Nuclear

WJM/mm

cc: Mr. J. Higgins
All Parties

STATE OF NEW YORK)
 : ss.:
COUNTY OF SUFFOLK)

MILLARD S. POLLOCK, being duly sworn, deposes and says that I am a Vice President of Long Island Lighting Company, the owner of the facility described in the caption above. I have read the Notice of Violation dated January 21, 1983, and also the response thereto prepared under my direction dated February 19, 1983. The facts set forth in said response are based upon reports and information provided to me by the employees, agents, and representatives of Long Island Lighting Company responsible for the activities described in said Notice of Violation and in said response. I believe the facts set forth in said response are true.

Millard S. Pollock

MILLARD S. POLLOCK

Sworn to before me this

21st day of *February*, 1983.

Connie Maria Pardo

CONNIE MARIA PARDO
NOTARY PUBLIC, State of New York
No. 82-46153-10
Qualified in Suffolk County
Commission Expires *March 30, 1983*