



LONG ISLAND LIGHTING COMPANY

SHOREHAM NUCLEAR POWER STATION

P.O. BOX 618, NORTH COUNTRY ROAD • WADING RIVER, N.Y. 11792

Direct Dial Number

November 12, 1982

SNRC-791

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Instrument Lines - Regulatory Guide 1.11
Shoreham Nuclear Power Station - Unit 1
Docket No. 50-322

- References:
- (1) Letter from NRC (A. Schwencer) to LILCO (M. S. Pollock) dated 9/20/82
 - (2) Letter SNRC-789 dated 11/8/82
 - (3) Letter SNRC-767 dated 9/9/82
 - (4) Letter SNRC-783 dated 10/29/82
 - (5) Letter SNRC-768 dated 11/3/82

Dear Mr. Denton:

The Reference 1 letter transmitted NRC requests for information on various topics, namely, Engineered Safety Feature (ESF) Reset Control, Instrument Lines Penetrating Containment (Regulatory Guide 1.11), and Environmental Qualification of Safety Related Electrical Equipment. ESF Reset Controls was addressed in Reference 2, and Environmental Qualification was addressed in References 3, 4 and 5.

The following information is provided in response to the NRC requests concerning instrument lines penetrating the containment and the provisions of Regulatory Guide 1.11 (including backfitting requirements) and, with the exception of additional information being prepared for GE Series 200 penetrations, completes LILCO's response to the Reference 1 letter.

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Shoreham complies with Regulatory Position E.2 of the supplement to Regulatory Guide 1.11 in that:

- a. Each instrument line connected to the reactor coolant pressure boundary and penetrating containment is sized or includes an orifice, such that if a postulated failure of the piping or of any component including the postulated rupture of any valve body in the line outside primary reactor containment occurs during normal reactor operation:
 - (1) The leakage is reduced to the maximum extent practical consistent with other safety requirements;
 - (2) The rate and extent of coolant loss are within the capability of the reactor coolant makeup system;
 - (3) The integrity and functional performance of secondary containment, and associated safety systems (e.g., filters) will be maintained; and
 - (4) the potential offsite exposure will be substantially below the guidelines of 10CFR Part 100.
- b. The status (open or closed) of each excess flow check containment isolation valve for instruments connecting to the reactor coolant pressure boundary is indicated in the main control room by use of position switches on each excess flow check valve.

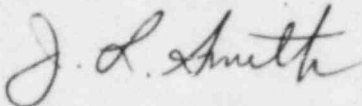
The status (open or closed) of each containment isolation valve for safety and non-safety instruments connecting to the containment atmosphere will be verified during normal plant operation. Isolation valves for safety instrumentation will be locked open to assure their correct position for plant safety and instrument operation. Valves associated with non-safety instrumentation will be verified open by routine surveillance which would include periodic plant surveys, or by noting correct functioning (during operation) of the associated non-safety instrumentation.

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With the one exception noted above, the information contained herein as supplemented by References 2 thru 5 completes LILCO's response to the Reference 1 letter.

Should you have any questions, please contact this office.

Very truly yours,



J. L. Smith
Manager, Special Projects
Shoreham Nuclear Power Station

RWG:mp

cc: J. Higgins
All parties