

LONG ISLAND LIGHTING COMPANY

Operating License NPF-82
Docket No. 50-322
License Change Application #8

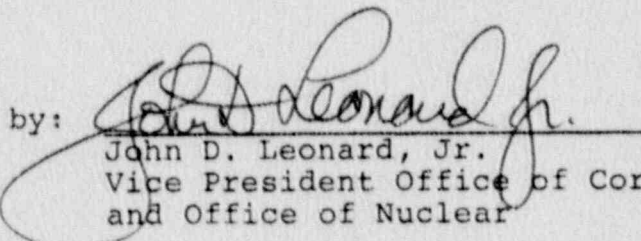
This License Change Application requests modification to Operating License NPF-82 for the Shoreham Nuclear Power Station.

1. To delete Section 6.2.3, "Independent Safety Engineering Group (ISEG)," from the Technical Specifications (NUREG-1357, April 1989, as amended).
2. To delete various reference(s) to ISEG in the Technical Specifications.

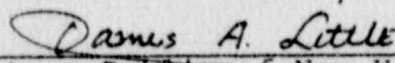
The request and supporting documentation are contained in Attachment 1 to this License Change Application.

Long Island Lighting Company

by:


John D. Leonard, Jr.
Vice President Office of Corporate Services
and Office of Nuclear

Subscribed and sworn to before me this 21st day of August 1990.


Notary Public of New York

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PDR ADOCK 05000322
P PNU

JAMES A. LITTLE
NOTARY PUBLIC, State of New York
No. 4886267, Suffolk County
Term Expires May 18, 1991

My Commission Expires: _____



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of

Long Island Lighting Company)
)
)

Docket No. 50-322

SHOREHAM NUCLEAR POWER STATION - UNIT 1

CERTIFICATE OF SERVICE

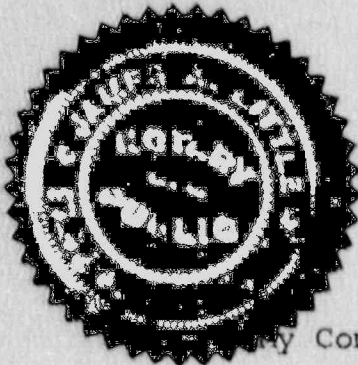
I hereby certify that copies of License Change Application #8 to the Operating License NPF-82 for Shoreham Nuclear Power Station - Unit 1, dated August 21st have been served on the following by hand delivery or by deposit in the United States mail, first class, this 22nd day of August:

Ms. Donna Ross
New York State Energy Office
2 Rockefeller Plaza
Albany, New York 12223

L. F. Britt

L. F. Britt, Manager
Nuclear Licensing and
Regulatory Affairs

Subscribed and sworn to before me this 21 day of August, 1990.



James A. Little

Notary Public of New York

JAMES A. LITTLE
NOTARY PUBLIC, State of New York
No. 4886267, Suffolk County
Term Expires May 18, 1991

My Commission Expires:

ATTACHMENT 1
TO
SNRC-1745

Basis For No Significant Hazards Finding
and
Proposed Technical Specification Changes

**Attachment 1
License Change Application #8
Operating License NPF-82**

1.0 Description of Change

This proposed amendment (1) deletes the function, composition, responsibilities, and records requirements of the Independent Safety Engineering Group (ISEG) (Section 6.2.3) from the Administrative Controls (Section 6) of the Technical Specifications (NUREG-1357, April 1989, as amended) and, in essence, relieves LILCO of the requirement to maintain an ISEG, and (2) deletes various reference(s) to "ISEG" as found in the Technical Specifications.

2.0 Reason for Change

Under the Settlement Agreement with the State of New York, LILCO is contractually prohibited from ever operating Shoreham. The Shoreham reactor has been defueled and all fuel has been placed in the Spent Fuel Storage Pool. In accordance with the Commission's Confirmatory Order Modifying License (NPF-82) issued March 29, 1990, LILCO is prohibited from placing any nuclear fuel into the Shoreham reactor vessel without prior approval from the Commission.

In Shoreham's non-operating and defueled condition, an ISEG is no longer necessary or applicable for implementing the Commission's long-term improvements in organization and management for Shoreham as an operating plant. To continue an ISEG requires LILCO to maintain burdensome and costly activities which provide no health or safety benefits. This License Change Application request will result in a significant reduction in LILCO's costs associated with an ISEG. Such savings, which are estimated to be \$600,000 annually, will benefit LILCO's ratepayers.

The Shoreham Independent Safety Engineering Group (ISEG) was established to perform independent reviews of plant operations, and other ancillary reviews, in response to item I.B.1.2 of NUREG-0660, "NRC Action Plan Developed As A Result Of The TMI-2 Accident." The principal function of the ISEG is to examine plant operating characteristics, NRC issuances, Licensing Information Service advisories, and other appropriate sources of plant design and operating experience information that may indicate areas for improving plant safety and reduce the likelihood for adverse radiological effects.

SNPS cannot realize the full benefit of ISEG with the unit permanently shutdown. Most operating experience is not applicable or partially not applicable. This includes SERs, SOERs, O&MRs and NRC issuances. For example, from January 1, 1990 applicability of new issuances has run at approximately 30%, as listed:

	<u>Issuances</u>	<u>Deferred</u>	<u>Applicable</u>
SERs	11	6	4
SOERs	2	1	1
O&MRs	<u>6</u>	<u>1</u>	<u>1</u>
	19	8	6

For NRC issuances (Information Notices, Bulletins, Generic Letters), many are not applicable with SNPS defueled. Evaluations at SNPS are currently performed by line organizations followed by a Licensing review to determine if dispositions adequately address identified concerns. A third review by ISEG is no longer prudent because of the reduced safety concerns with the plant defueled.

Review of other INPO operating experience information indicates that most information (on Nuclear Network) is no longer applicable to SNPS. Much information concerns plant problems while operating (e.g., plant trips) or concerns applicable to plants which have been operating for some time (e.g., contamination).

Summarizing, Maintenance of an ISEG is no longer prudent because of the limited amount of operating experience (internal and external) applicable to SNPS while defueled and the lack of safety significance for those items that do apply to current plant conditions. For the limited number of items considered applicable, existing organizations external to ISEG do perform these assessments. Feedback to the Office of Training to support the operational training program can be accomplished by several existing mechanisms.

3.0 Basis for No Significant Hazards Finding

Based on the following reasoning, LILCO has determined that the proposed amendment does not involve a significant hazards consideration.

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated because the change is not related to any accident analysis and does not affect the function or operation of any system or equipment. The change is administrative in nature.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated because the proposed change is administrative in nature. No physical alterations of plant configuration or changes to setpoints or operating parameters are proposed. The change does not affect the function or operation of any system or equipment.
3. The proposed amendment does not involve a significant reduction in a margin of safety because the change being proposed is unrelated to any margin of safety as defined in the bases for any technical specification. The proposed change does not increase risk of radiological exposure to the offsite general public.

The Commission has provided guidance concerning the applicability of standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870) of amendments that are considered not likely to involve significant hazards considerations. Example (i) relates to a change which is a purely administrative change to technical specifications. This proposed technical specification change clearly falls within this category.

4.0 Timing of Change

Since this change is administrative in nature, LILCO requests that it become effective upon issuance.

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