

DOCKETED  
USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DEC 23 11:15

Before the Atomic Safety and Licensing Board

In the Matter of )  
 )  
LONG ISLAND LIGHTING COMPANY ) Docket No. 50-322 (OL)  
 )  
(Shoreham Nuclear Power Station, )  
Unit 1) )

Responses to the Board's Request  
for Information Concerning Certain I&E Reports

On November 30, 1982, the Board made several requests for information concerning matters contained in recent NRC I&E Reports on Shoreham. LILCO's responses are contained in the attached letter from William J. Museler to LILCO's counsel dated December 18, 1982.

Specifically, with respect to I&E Report 50-322/82-29, the Board asked for information concerning the matter included on page 6 of the report involving:

a change that was made without any E&DCR being issued, and an E&DCR was never issued until the staff inspector discovered it quite sometime later, and LILCO thereafter issued the E&DCR. It was apparently a non-safety related change; however, consistent with the testimony we have [heard] and what the report itself states, it was LILCO's practice to issue E&DCRs in the same way for those matters as for safety related. We want to get a good understanding as to what happened here and what that says about LILCO's procedures.

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If a change could go that long undetected without an E&DCR being issued, we want to know what happened in the particular item and how the process could have allowed it to occur that way and then go undetected thereafter.

So, that would be the initial change procedures, the audits, the verifications, the field quality control whatever should have been involved in QA.

Tr. 14,793-14 (Brenner). The information concerning this matter is provided in Item 2 of Mr. Museler's letter.

The second Board request concerned the matters covered on pages 9-10 of I&E 50-322/82-29:

In there, the inspector questioned the lack of QA/QC reviews on the flood protection analysis, and also on the core drilling procedures; that is, the procedure for drilling for penetrations through concrete, which in turn, affects rebar in the concrete. The inspector was told that at least in part, there was no QA/QC performed because these items were not safety related, but that characterization may only apply to the flood protection analysis. I'm not sure right now.

But in any event, we would like to know whether the inspector's version of what LILCO's reasons were are accurate, and whether that --and if so, how LILCO people could believe that in light of all the testimony as to the importance of looking at non-safety related matters for their impact on safety. When you read the report you will see that the very analysis being performed for flood protection at least was to assess its impact on safety-related matters.

And beyond the full explanation of the particular matters involved here, what that says about the overall implementation of the program in terms of the evidence that we have heard as to how the program was proposed to be implemented, and how cognizant personnel could believe that no QA/QC was necessary.

Tr. 14,794-95 (Brenner). The information concerning this matter is provided in Items 3 and 4 of Mr. Museler's letter.

Finally, with respect to I&E Report 50-322/82-26, the Board expressed interest in the matter cited as a Severity Level V violation, described on pages 8-9 of the report:

It involves the fact that drawings were not updated, contrary to E&DCRs which had been issued. And -- well, the description is in there. While the description is in there, it talks about how this preliminary report by the inspector, the revisions to the drawings were issued incorrectly, indicating that the E&DCRs had been incorporated when in fact they had not been.

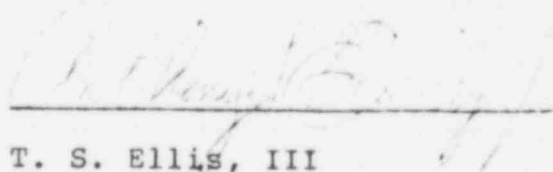
The log also incorrectly indicated the drawings had been updated, and of course, through the testimony we are familiar with these procedures by now and our question is similar to the ones we asked: what happened, and what does that mean in terms of the way this program is being implemented in the context of the testimony that we have heard.

Tr. 14,858-59 (Brenner). The information concerning this matter is contained in Item 1 of Mr. Museler's letter.

We trust the enclosed material responds to the Board's questions concerning these I&E reports.

Respectfully submitted,

LONG ISLAND LIGHTING COMPANY

  
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DATED: December 21, 1982

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CERTIFICATE OF SERVICE

In the Matter of  
LONG ISLAND LIGHTING COMPANY  
(Shoreham Nuclear Power Station, Unit 1)  
Docket No. 50-322 (OL)

I hereby certify that copies of RESPONSES TO THE BOARD'S REQUEST FOR INFORMATION CONCERNING CERTAIN I&E REPORTS were served upon the following by first-class mail, postage prepaid, by Federal Express (as indicated by an asterisk), or by hand (as indicated by two asterisks) on December 21, 1982.

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