



LONG ISLAND LIGHTING COMPANY

175 EAST OLD COUNTRY ROAD • HICKSVILLE, NEW YORK 11801

MILLARD S. POLLOCK
VICE PRESIDENT - NUCLEAR

SNRC-854

March 8, 1983

Mr. Darrell G. Eisenhut, Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Eisenhut:

In discussions with members of the NRC Staff on March 4, 1983, LILCO was requested to submit proposed FSAR revisions which reflect my commitments contained in SNRC-844, dated March 2, 1983.

Attached are revisions to FSAR Sections 3.1.2.1, 13.5.1.2 and 17.2.1, which we intend to incorporate into a formal FSAR amendment at the next opportunity. These changes, I believe, are consistent with my letters SNRC-795 and SNRC-844 and follow the guidance of your letter of February 18, 1983. As discussed with the Staff, these are indicative of the types of changes that will be incorporated into the FSAR to meet the commitments contained in SNRC-844. We are in the process of preparing changes to the rest of the FSAR and will submit them as soon as possible.

I trust that with these proposed FSAR changes, the Staff finds this issue resolved.

Very truly yours,

M. S. Pollock
Vice President-Nuclear

Attach.

cc: Mr. J. Higgins
All Parties listed in Attach. #1

8303140255 830308
PDR ADOCK 05000322
S PDR

safety shall be maintained by or under the control of the nuclear power unit licensee throughout the life of the unit.

Design Conformance

Structures, systems, and components important to safety are listed in Table 3.2.1-1. The total quality assurance (QA) program is described in Chapter 17 and is applied to the items contained in this table. The QA program assures that all phases of design and construction conform to regulatory requirements and design bases described in the license application. In addition, the program assures adherence to specified standards of workmanship and implementation of recognized codes and standards in fabrication and construction. It also includes the observance of proper preoperational and operational testing and maintenance procedures as well as the documentation of the foregoing activities by keeping appropriate records. The total QA program of Long Island Lighting and its principal contractors satisfies the requirements of 10CFR50, Appendix B.

Structures, systems, and components are first classified in Chapter 3 with respect to their location and service and their relationship to the safety function to be performed. Recognized codes and standards are applied to the equipment in these classifications as necessary to assure a quality product in keeping with the required safety function. In cases where codes are not available or the existing code must be modified, an explanation is provided in the application section.

Documents are maintained which demonstrate that the requirements of the QA program are being satisfied. This documentation shows that appropriate codes, standards, and regulatory requirements are observed, specified materials are used, correct procedures are utilized, qualified personnel are provided, and that the finished parts and components meet the applicable specifications. These records are available so that any desired items of information are retrievable for reference. These records will be maintained during the life of the operating licenses.

The detailed QA program developed by Long Island Lighting contractors satisfies the requirements of Criterion 1.

3.1.2.2 Design Basis for Protection Against Natural Phenomena (Criterion 2)

Criterion

Structures, systems, and components important to safety shall be designed to withstand the effects of natural phenomena such as earthquakes, tornadoes, hurricanes, floods, tsunamis, and seiches without loss of capability to perform their safety functions. The design bases for these structures, systems, and components shall reflect: (1) appropriate consideration of the most severe of the natural phenomena that have been historically reported for

INSERT "A"

3.1.2.1

Non-safety related structures, systems, components and plant computer software will be accorded as a minimum, the safety significance given to them in the FSAR, the technical specifications and emergency operating procedures. This will assure that the safety significance accorded to non-safety related structures, systems and components is maintained during the operation of Shoreham. The charters of the Review of Operations Committee, the Nuclear Review Board, and the Independent Safety Engineering Group shall also reflect these considerations. Also, the Shoreham preventive and corrective maintenance program, the design change control program, procedures for procurement of equipment, procedures for modification and removal of equipment from service, and the applicable portions of the Quality Assurance Program will ensure that LILCO continue to apply the safety significance accorded to non-safety related structures, systems, and components given to them in the FSAR, technical specifications and emergency operations procedures. Thus, the responsible personnel implementing these programs and procedures, shall, in exercising their judgment on the appropriate measures to be applied to non-safety related structures, systems and components, do so in accordance with this corporate policy.

SNPS-1 PSAR

will be prepared, reviewed, and approved per Fig. 13.5.1-1. Permanent changes to these procedures will require the same review and approval as the original procedure.

The written repair and maintenance procedures will indicate the inspections and checks which must be performed and will also indicate the records which must be kept. The procedures will indicate where independent verification of inspections or checks should be performed by other than those performing the maintenance. ^

INSERT B

Materials and parts utilized in the repair and maintenance of the safety related portions of the station will be of equivalent quality to the original materials. The procurement documents will be audited by LILCO Quality Assurance personnel to ensure that appropriate quality control requirements are fulfilled as defined in Section 17.2.

Storage and material identification procedures will assure that purchased materials and parts do not deteriorate in storage and are properly identified prior to their installation or use as defined in Section 17.2.

The Maintenance Engineer or his designated alternate will ensure that records of maintenance to safety related equipment are prepared in accordance with the applicable station procedures.

Fuel handling procedures will be prepared, reviewed, and approved per Table 13.5.1-1. The fuel handling procedures will indicate items which require verification by specified personnel other than those performing the operation.

13.5.1.3 Modifications

Proposed modifications to safety related systems or components are subject to review by the ROC. The design of modifications will be to the same or equivalent codes and requirements used in the original station design as defined in Section 17.2.

13.5.2 Procedures

13.5.2.1 Operating Procedures

Detailed written procedures and checkoff lists will be originated, reviewed, and approved prior to normal operation of safety related systems/components, per Fig. 13.5.1-1. Operating procedures are performed by, or under the direction of persons designated as holders of Reactor Operator or Senior Reactor Operator licenses. Operating Procedures consist of three basic categories: General Operating Procedures, System Operating Procedures, and Emergency Operating Procedures.

INSERT B

13.5.1.2

The responsible personnel implementing these programs for routine repair and maintenance of non-safety related structures, systems, and components, shall, in exercising their judgment on the appropriate measures to be applied, maintain the safety significance accorded to them in FSAR, technical specifications and the emergency operating procedures. This will be accomplished within the context of the written repair and maintenance programs and procedures.

SNPS-1 FSAR

responsible for establishing and assuring implementation of the LILCO QA Program as described in the LILCO QA Manual. He is responsible for maintaining a working interface and communication within LILCO, regulatory agencies, consultants, contractors, inspection firms, and others as required to effectively execute the policies stipulated in the QA Program. He is responsible for assuring the establishment and continuous implementation of the quality assurance indoctrination and training program for LILCO quality assurance and other concerned personnel. The indoctrination and training will cover the quality related policies, procedures, and requirements applicable to the personnel involved. He is responsible for review and approval of applicable documents to assure the inclusion of appropriate quality requirements as indicated in Section 17.2.6. He is responsible for the performance of audits as described in Section 17.2.18.4

INSERT C

The QA Manager is responsible for defining the content and changes to the LILCO Quality Assurance Manual subject to review and approval as indicated in Table 17.2.6-1.

The QA Manager is authorized to evaluate the manner in which all activities both at the station and offsite are conducted, with respect to quality, by means of checks, reviews, audits, surveillance, and/or inspections. He will perform this evaluation on a planned and periodic basis to verify that the QA Program is being effectively implemented. He is responsible for periodically evaluating and reporting on the status and adequacy of the QA Program to the appropriate LILCO management. He has the authority and organizational freedom to identify quality problems, to initiate, recommend or provide solutions through designated channels, and to verify implementation of solutions. He has the authority to initiate stop work action, or control further processing, delivery, or installation of nonconforming material through appropriate channels as described in the applicable QA Procedure.

The minimum qualifications for the position of QA Manager are defined in Section 17.1.1A.

The QA Manager is assisted in carrying out his responsibilities by the QA Department staff consisting of Quality Systems and Field Quality Assurance Divisions. These Divisions consist of engineers, and technical and nontechnical personnel as required. In addition, this staff will be supplemented as required from other areas within LILCO, consultants or contractors. Line responsibility, coordination, and communication during this time will be through the QA Manager.

The Manager, Shoreham Nuclear Power Station (Plant Manager), reports to the Vice President, Nuclear, and has been delegated direct responsibility for the safe and reliable operation of the station. He is responsible for coordination of activities between regulatory agencies, other departments within LILCO,

INSERT C

17.2.1

The decisions of the Manager, Quality Assurance shall also consider the safety significance accorded to non-safety related structures, systems, components and plant computer software given to them in the FSAR, technical specifications and emergency operating procedures.

ATTACHMENT 1

Lawrence Brenner, Esq.
Administrative Judge
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Peter A. Morris
Administrative Judge
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. James H. Carpenter
Administrative Judge
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Daniel F. Brown, Esq.
Attorney
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Bernard M. Bordenick, Esq.
David A. Repka, Esq.
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

James Dougherty
3045 Porter Street
Washington, D.C. 20008

Herbert H. Brown, Esq.
Lawrence Coe Lanpher, Esq.
Karla J. Letsche, Esq.
Kirkpatrick, Lockhart, Hill
Christopher & Phillips
8th Floor
1900 M Street, N.W.
Washington, D.C. 20036

Mr. Marc W. Goldsmith
Energy Research Group
4001 Totten Pond Road
Waltham, Massachusetts 02154

MHB Technical Associates
1723 Hamilton Avenue
Suite K
San Jose, California 95125

Stephen B. Latham, Esq.
Twomey, Latham & Shea
33 West Second Street
P.O. Box 398
Riverhead, New York 11901

Ralph Shapiro, Esq.
Cammer and Shapiro, P.C.
9 East 40th Street
New York, New York 10016

Matthew J. Kelly, Esq.
State of New York
Department of Public Service
Three Empire State Plaza
Albany, New York 12223