



LONG ISLAND LIGHTING COMPANY

175 EAST OLD COUNTRY ROAD • HICKSVILLE, NEW YORK 11801

MILLARD S. POLLOCK
VICE PRESIDENT - NUCLEAR

June 27, 1983

SNRC-915

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

Response to Notice of Violation
NRC Inspection Report Number 83-10
SHOREHAM NUCLEAR POWER STATION - UNIT 1
DOCKET NO. 50-322

Reference: NRC letter (R. W. Starostecki) to LILCO
(M. S. Pollock), entitled, "Inspection No.
50-322/83-10", dated May 27, 1983.

Dear Mr. Starostecki:

This letter is in response to the routine inspection conducted by Mr. J. C. Higgins of the NRC Region I office for the period April 1 through May 9, 1983 of activities at the Shoreham Nuclear Power Station. The referenced letter stated that it appeared that one of our activities regarding the documentation control of Emergency Diesel Generator Test Procedures was not in full compliance with NRC requirements. The requested response is provided as Attachment 2 to this letter.

LILCO believes that the information contained herein should be sufficient to resolve the above concerns. If, however, you feel that additional information is required, please do not hesitate to advise us accordingly.

Very truly yours,

Millard S. Pollock
Vice President - Nuclear

RT:law L
Attachment

cc: J. Higgins
All Parties Listed In Attachment 1

STATE OF NEW YORK)
 : SS:
COUNTY OF SUFFOLK)

MILLARD S. POLLOCK, being duly sworn, deposes and says that I am the Vice President - Nuclear for Long Island Lighting Company, the owner of the Shoreham Nuclear Power Station. I have read the Notice of Violation dated May 27, 1983, and also the response thereto dated June 27, 1983 prepared under my direction. 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

Sown to before me this
27th day of June, 1983

ROSA LEE CLIVEROS
Notary Public, State of New York
No. 20-4708263
Qualified in Nassau County
Commission expires Mar. 30, 1984

ATTACHMENT 1

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ATTACHMENT 2

RESPONSE TO NOTICE OF VIOLATION
Inspection Report No. 83-10, Appendix A,
Documentation Control of Emergency
Diesel Generator Testing Procedures

NRC Concern

The Code of Federal Regulations, part 50, Appendix B, Criterion VI, "Document Control"; the Shoreham FSAR, Section 17.1.6A; and the LILCO Quality Assurance Manual, Section 6.3.1 and 6.3.6 require that measures be established to control the issuance of documents, such as procedures, including the changes thereto. These measures shall assure that documents, including changes, are distributed to and used at the location where the prescribed activity is performed.

Contrary to the above, the measures established did not assure that procedural changes were distributed to and used at the location where the prescribed activity was performed. Specifically, on April 27, 1983, a portion of PT.307.005C, "Emergency Diesel Generators," was performed using a copy of the test procedure that did not contain Test Change Notice #1 (which was issued on April 15, 1983).

LILCO Response

LILCO confirms the Resident Inspector's finding that the official, in-use version of test procedure PT.307.005C, "Emergency Diesel Generators" did not incorporate a previously issued Test Change Notice (TCN #1). However, as stated in the subject inspection report, the data taken indicated that the test personnel had complied with both the original procedure and with the revised tolerances as presented in the aforementioned TCN. This affirms that although the official version of the test procedure did not incorporate the TCN, the test personnel were familiar with the revised test parameters. Again, as noted by the NRC in inspection report 83-10, "failure to enter the TCN (into the official version of the test procedure), in this instance, had no effect on the actual testing performed."

(1) Corrective Action Taken and Results Achieved

TCN #1 to PT.307.005C was written to change the tolerances on the 22 hour diesel run from 3500 \pm 70 KW to 3500 +70, -0 KW. Although this TCN was not incorporated into the official, in-use copy of the preoperational test, the test personnel were nevertheless cognizant of the revised requirements. A copy of TCN #1 was incorporated into the preoperational test procedure at the time the discrepancy was noted by the NRC.

(2) Corrective Actions to be Taken to Avoid Further Non-Compliance

Preoperational and Acceptance Tests for which testing is not complete will be reviewed and the latest TCN number (if applicable) will be written on the Transmittal Cover Sheet of the original and both controlled copies of the test procedure. This will ensure that cognizant individuals are aware of the number of TCNs outstanding against a given procedure. As new TCNs are issued, the Transmittal Cover Sheets will be updated to reflect these additions.

(3) Date When Full Compliance Will Be Achieved

Test Change Notices issued after June 8, 1983 for preoperational and acceptance tests have the TCN number incorporated on the appropriate cover sheets. Previously issued TCNs for preoperational and acceptance tests that are not complete have been reviewed and the latest TCN number was added to their cover sheets where applicable.