



LONG ISLAND LIGHTING COMPANY

175 EAST OLD COUNTRY ROAD • HICKSVILLE, NEW YORK 11801

MILLARD S. POLLOCK
VICE PRESIDENT - NUCLEAR

SNRC-837
February 10, 1983

Mr. Thomas T. Martin, Director
Division of Engineering & Technical Programs
U.S. Nuclear Regulatory Commission, Region I
King of Prussia, PA 19406

NRC Inspection No. 82-34
Shoreham Nuclear Power Station-Unit 1
Docket No. 50-322

Dear Mr. Martin:

This letter responds to your letter of January 2, 1983 which forwarded the report of the inspection conducted by representatives of your office on November 29-December 3, December 6-10 and December 13-15, 1982.

The inspection was performed to determine the status of the LILCO Quality Assurance Program for operations of the Shoreham facility. Your letter stated that no violations were observed but that there were a number of items that must be addressed and appropriately corrected by LILCO.

The Inspection No. 50-322/82-34 report contains a table (pages i-iiii inclusive) that itemizes the Inspectors' findings. Following are LILCO's responses to item 21, regarding uncontrolled M&TE Vendor manuals, and to those open items identified with an asterisk. The responses appear below in the same sequence they are listed on the table. Please note that LILCO has taken exception to the findings for items 05, 11, 15, 21 and 22. Explanations are provided for all exceptions, and action on item 05 is being performed as suggested.

The response time for the issues addressed in the report was extended via telephone by Mr. J. C. Higgins, January 26, 1983, and by Mr. D. L. Capton, February 3, 1983.

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- I. Item: No. 322/82-34-29 para 5.3.1.2.
Issue: Verify continuing service contract with
qualified A/E is in effect prior to O.L. (Open)

Response

Stone and Webster will continue as the Qualified Architect Engineer of record following the present construction stage of operation. The period to be covered by Stone and Webster will extend from at least thirty days prior to fuel load until the first refueling outage, or until another Qualified Architect Engineer has been engaged. A program, utilizing the services of Stone and Webster, meets the requirements of the referenced FSAR 13.1.1.3 for a "Continuing Services Contract" with a qualified Architect Engineer firm prior to fuel load to provide supplementary engineering and consultant support when needed.

The procurement of additional "Continuing Services Contracts" with other qualified Architect Engineering firms is being actively pursued. However, predicated on the acceptability of this interim program, the need for this contract(s) to be in place by fuel load is no longer a prerequisite.

The above information, presented to the NRC at Bethesda on January 28, 1983, is fully responsive to the issue and should be adequate for close-out.

Completion Target Date: 30 days prior to fuel load.

- II. Item: No. 322/82-34-04 para 5.3.1.4
Issue: Licensee must determine which station procedures
are in-use and inform station personnel (Open)

Response

Station Procedure SP 12.001.01, "Index and Organization of Station Operations Manual" has been revised to include the term "In Use" on the Plant Procedure Status List (PPSL) for the procedures in use. The PPSL has been updated to indicate those procedures currently in use and will be continuously updated as the status of procedures changes.

Completion Target Date: Completed.

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- III. Item: No. 322/82-34-05 para 5.3.1.4
Issue: Summary document needs to be prepared to identify and index source documents to the requirements of ANSI N18.7-1976 (Open)

Response

LILCO takes exception to the finding that a summary document has not been developed as required by ANSI N18.7-1976. LILCO considers the QA Manual, and specifically Appendix D of the Manual, as a summary document adequate to satisfy the requirements found in paragraph 5.1 of the ANSI Standard.

However, to promote convenience and clarity, LILCO is preparing a detailed matrix to cross-reference ANSI N18.7-1976 requirements and specific LILCO procedure number references. The index will serve as an aid to verify inclusion of the ANSI N18.7 requirements in the appropriate LILCO procedures.

Completion Target Date: April 15, 1983

- IV. Item: No. 322/82-34-06 para 5.4.1
Issue: Establish phase in period for LILCO engineering and technical support for safety related activities (Open)

Response

LILCO has developed an interim program for management control of station modifications and engineering support for Shoreham Nuclear Power Station at fuel load. This interim program will transfer project engineering organization and the engineering function, which had been the responsibility of the Manager, Shoreham Construction and Engineering, to the Manager, Nuclear Engineering. Therefore, the same Project Engineering Division which was responsible for the engineering during the construction phase will control the engineering during the operating phase. Throughout this interim period, Stone and Webster Engineering Corporation (SWEC), the qualified Architect Engineer of record for the plant construction, will be retained to supply the necessary engineering support for Shoreham operations. This interim program will be implemented in accordance with approved administrative procedures which are presently being developed by LILCO and SWEC organizations.

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On January 28, 1983, LILCO presented a summary of this interim program to NRC representatives from the Offices of Nuclear Reactor Regulation and Inspection and Enforcement and received verbal concurrence for this management approach to the control of engineering support at fuel load. In addition, LILCO committed to provide a letter transmittal by mid-February documenting the necessary changes to the FSAR.

LILCO anticipates that this interim program will be ready for NRC Inspection and Enforcement review by mid-to-late April 1983 and will be in effect until no later than the first refueling outage. This time interval will constitute the phase-in period during which the LILCO engineering and support organizations will be able to complete the necessary programs and procedures to allow LILCO to perform engineering and design activities within its own organizations.

Completion Target Date: April 30, 1983

- V. Item: No. 322/82-34-03 para 4.2.3.3.4
Issue: Audits must be performed to assess plant readiness for operations (Open)

Response

The NRC inspector noted in paragraph 4.2.3.3.4 that LILCO had already scheduled three separate readiness audits. The present status of these audits follows:

1. A QA audit was conducted January 24-February 4, 1983 to determine readiness of offsite organizations to support the station during operations. Preliminary analysis of the results indicates that all organizations are either adequately prepared or will be prepared and phased into their support roles by means of the interim program for management control of station modifications and engineering support that is described in Response IV.
2. The NRB/QA audit to evaluate LILCO readiness for fuel load was started on January 21, 1983. However, the audit has been interrupted because of the revised fuel load date. It will be resumed at a time more consistent with the fuel load schedule. Present plans are to complete the audit in March or April, 1983, in time to effect any required corrective action prior to fuel load.

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3. The QA Department audit to determine the plant staff's readiness to operate the station in accordance with the LILCO QA Program will be completed during March or April, 1983, in advance of fuel load.

Completion Target Date: 1. February 4, 1983
2. April 30, 1983
3. April 30, 1983

- VI. Item: No. 322/82-34-14 para 6.4.4
Issue: Tagout forms in use which are not specified in the procedure (Open)

Response

Although the log forms in use in the Control Room differed in format from those specified in the Station Procedure, they contained the same information and therefore caused no inadequacies in the control of maintenance activities or component operations. Furthermore, Section 3.5 of the procedure designated the forms appended therein as "samples" and therefore did not specifically preclude the use of forms with different formats.

However, in order to provide clarification and consistency of forms, SP 12.011.01, Station Equipment Clearance Permits, was revised (Revision 9) and approved 1/11/83. Appendix 12.2, SECP Log Book, and Appendix 12.11, Equipment Information Card Log, were changed so that the log forms specified in the procedure are used in the Control Room.

Completion Target Date: Completed

- VII. Item: No. 322/82-34-21 para 8.4.3
Issue: Uncontrolled M&TE Vendor manuals in M&TE lab (Open)

Response

LILCO does not concur that vendor technical manuals maintained in the M&TE laboratory need to be controlled copies. They are not used to perform M&TE calibrations. The calibrations are performed in accordance with formally approved procedures.

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LILCO will, however, study the need to control these manuals. Meanwhile, they have been removed from the laboratory until such time that the study is completed.

Completion Target Date: Completed

VIII. Item: No. 322/82-34-22 para 8.4.4
Issue: Poor work practices and environmental conditions in the M&TE lab (Open)

Response

LILCO takes exception to the finding that poor work practices are used in the M&TE laboratory and that poor environmental conditions exist.

At the time of inspection, the laboratory was undergoing physical expansion. This expansion, requiring the cutting of an opening three feet in width through a cinder block wall, resulted in an unusual amount of dust. In addition, the expansion necessarily caused the room to be in some disarray. Immediate steps were taken to clean the shop and reorganize the furniture, benches and shelves, which actions have been completed. A regular cleaning schedule has been established to ensure continued cleanliness.

Work practices did not deteriorate during the expansion of the calibration laboratory. As the inspector noted in paragraph 8.3.2.5 of this report, proper calibration techniques are utilized by qualified personnel with calibration standards traceable to the National Bureau of Standards.

Instruments requiring dust protection are segregated from the shop environment. For example, dead weight tester weights are stored in separate metal boxes. Of course, not all instruments require dust protection. For example, the electronic standards and test gauges that LILCO uses do not require special dust protection.

Regarding environmental control, a 24-hour a day circular chart monitors and records the temperature and humidity in the M&TE shop. The ventilation system supplying the M&TE shop is part of the Office and Service Building system that is maintained at proper temperature and humidity levels. In addition, a separate air conditioning unit, supplying the M&TE room only, maintains environmental control of the room.

Completion Target Date: Completed.

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- IX. Item: No. 322/82-34-23 para 10.4.1
Issue: QA record files not properly controlled (Open)

Response

The inspector was concerned that access to QA record files in an interim storage area was not adequately controlled. Since that time, the QA record files have been significantly reduced at that location, and they will be eliminated entirely when Records Management SR-2 has been relocated to the Office and Service Building.

Station Procedures SP 12.008.02 and SP 12.008.04 have been revised to reflect direct input of Plant Staff records into SR-2. Approval and effective dates are pending.

Completion Target Date: April 15, 1983

- X. Item: No. 322/82-34-01 para 4.2.3.3.2
Issue: QAP-S procedures need to clarify use of words "should" and "may" and more clearly describe requirements and activities (Open)

Response

LILCO has carefully reviewed the use of "should" and "shall" in the past. In response to the NRC's request, however, the LILCO QA Department and OQA Section are reviewing and will continue to review the OQA procedures and instructions for possible clarity in the use of the words "should," "shall," and "may." In addition, the procedures will be reviewed for proper references and consistency with terms used in QAPs.

If further revisions are prepared, they will be distributed for comment to the Plant Manager and the QA Department Manager in accordance with QAP-S-05.2, "Operational Quality Assurance (OQA) Procedure Development." If necessary, the procedures will be revised in accordance with QAP-S-5.2.

Moreover, LILCO has already reviewed each of the procedures specifically listed in 4.2.3.3.2. In some instances, LILCO is making changes from permissive to mandatory language for clarity and in some instances there will be no changes. Even in those instances where LILCO has decided to make changes, the changes do not affect the ways the procedures had been interpreted and implemented. In each of the instances where a change was made from permissive to mandatory language, there was no regulatory requirement, FSAR commitment or QA Manual commitment that required the use of the mandatory language. The changes were voluntarily made by LILCO to enhance clarity.

Completion Target Date: March 31, 1983

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- XI. Item: No. 322/82-34-11 para 6.4.1
Issue: Maintenance program procedures not adequate
(Open)

Response

LILCO takes exception to the finding that maintenance program procedures are inadequate. LILCO believes that the procedures adequately implement the maintenance program. The maintenance program complies with ANSI N18.7-1976 paragraphs 5.1 and 5.2.7.1 by use of the Maintenance Work Requests (MWR) Program, SP 12.013.01. This Program includes detailed maintenance planning allowing evaluation of the use of special processes, when necessary, and the use of proper equipment and materials in performing the necessary tasks. This program also allows for an assessment of maintenance-related potential hazards to personnel and equipment.

The Program is a computerized, state-of-the-art process, using on-line CRT displays that allow prompt access at various plant locations, including the Control Room. This allows constant monitoring of on-going maintenance activities throughout the plant.

Each safety-related MWR, prior to action, is reviewed by the relevant Section Head, the Watch Engineer, and OQA Engineer. This ensures the use of proper procedures in performing the maintenance.

The inspector notes in paragraph 6.4.1 that maintenance procedures do not adequately define:

- (1) Types of documents to be assembled in the work package
- (2) All pre-planning considerations which must be addressed by the maintenance coordinator (e.g., such as pre-planning checklist)
- (3) Definition of the types of maintenance activities which can be performed without a procedure (Although the MWR makes this evaluation, it does not provide a basis on which the decision is made)
- (4) Criteria for determining which housekeeping zones are applicable to specific types of maintenance activities (Although the MWR provides for selecting a housekeeping zone, neither the MWR procedure nor the housekeeping procedure (SP 12.023.01) provides a basis for making this decision)

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- (5) Criteria for maintenance of system cleanliness and for cleaning and/or flushing of systems (These criteria are specified in SP 12.023.02; however the MWR does not refer to this procedure)
- (6) Definition as to what documents will be incorporated into the final maintenance activity record (Currently SP 12.013.0 states that the maintenance record consists of the MWR and associated documents used for performance of the work, but it does not define these documents)

Response to Items (1) and (2) above:

Since the MWR is the authorization document, all work procedures, inspections, and permits are assembled with the controlling document.

Step 22 of the MWR form requires the identification of specific work procedures. In addition, the MWR form provides a pre-planning checklist that requires, among other things, step-by-step consideration of procedures, permits, inspections, and tagging that may be required to perform the described maintenance-related task. Qualified maintenance personnel, knowledgeable in both administrative and maintenance procedures and maintenance/repair techniques, engage in this step-by-step process.

In addition, in compliance with SP 12.013.01 the information detailed on the MWR is reviewed by section supervision prior to the assignment of the work. Upon assignment and receipt of the MWR package, the foreman is responsible for reviewing the package and all pertinent data, plans, and schedules. He is also responsible for notifying all relevant sections of the maintenance scheduling and personnel assignments.

OQA reviews this entire process to ensure compliance with both administrative and maintenance procedures. This OQA review is performed for all safety-related MWR's.

Response to Item (3) above:

Various maintenance procedures cover both specific and generic maintenance activities. There are also many potential maintenance activities for which it is impossible to have a specific procedure for each activity or to define each activity that may be accomplished without a procedure.

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Hence, the need for generic procedures. The enormous number of potential maintenance activities is also the reason for the system to include the flexibility for some activities to be done without a procedure. This practice is consistent with the practice at other licensed and operating plants.

Response to Items (4) and (5) above:

Housekeeping Zones are established by the Maintenance Engineer in order to maintain the cleanliness criteria established by the ASME Code. The type Zone established, i.e. Zone I, II, III or IV, is determined by the work activity, as defined by the Maintenance Work Request (MWR).

SP 12.023.02, "Pressure Boundary Integrity and Cleanliness," defines the criteria for system cleanliness and for cleanliness/flushing. These criteria are ASME requirements. SP 12.023.01 "Station Housekeeping," is a checklist item on the MWR and references SP 12.023.02. It is also used to maintain cleanliness and specify cleanliness criteria established by SP 12.023.02.

Response to Item (6) above:

The MWR serves as a guide for the collection of all documents used in performing the work. The documents used to perform the work, defined prior to job initiation, are required by SP 12.013.01 to be included in the final work package. In accordance with paragraph 10 of SP 12.013.01, support procedures and associated documentation required to complete the maintenance task may be included. The MWR will reference these procedures.

In addition, LILCO is currently preparing a nuclear management system control manual. This manual will more clearly delineate the policy and organization that are corporately in place to better understand the expected interfaces between departments and divisions.

In conclusion, it appears that this observation resulted from a misunderstanding by the NRC I & E inspector as to the nature, scope and purpose of the maintenance program procedures, particularly the maintenance work requests. The above information should be adequate to close out this item No. 322/82-34-11.

Completion Target Date: April 30, 1983 (for policy and organization portion)

XII. Item: No. 322/82-34-15 para 7.4.1
Issue: I&C program procedures not adequate (Open)

Response

LILCO takes exception to this finding for the following reasons:

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1. In paragraph 7.4.1, the Inspector states, "I&C does extensive troubleshooting, but there are no procedural definitions as to when corrective maintenance procedures must be used and when troubleshooting without a procedure can be performed." To the contrary, LILCO has a mechanism for determining when troubleshooting without a procedure is permissible. All troubleshooting is covered by an MWR. In reviewing the MWR, the work done without a procedure will be reviewed and approved.
2. Paragraph 7.4.1 states further that "many activities performed by I&C are not defined in the procedure. Based on the above, the inspector considered the activities specified in procedures SP 12.003.01 and 12.013.01 inadequate to define the overall I&C program." LILCO does not agree with this comment in that SP 12.003.01 defines the responsibilities of the I&C Section by specifying the duties of the I&C Engineer. While specific activities are not listed, the procedure clearly indicates that all activities associated with the calibration, repair, and testing of any station instrumentation and controls is the responsibility of the I&C Engineer. Other procedures, job descriptions, and corporate position analysis help define the I&C program.

LILCO is currently preparing a nuclear management system control manual. This manual will more clearly delineate the policy and organization that are corporately in place to better understand the expected interfaces between departments and divisions.

Completion Target Date: April 30, 1983 (for policy and organization portion)

XIII. Item: No. 322/82-34-16 para 7.4.2
Issue: T.S. related instruments not properly defined or controlled (Open)

Response

A draft procedure has been prepared and is presently in the review and comment cycle. It identifies T.S. related instrumentation, specifies calibration requirements, and controls data sheets and subsequent changes.

Completion Target Date: March 1, 1983

XIV. Item: No. 322/82-34-17 para 7.4.3
Issue: IST program not established (Open)

Response

SP 12.027.01, "ASME Section XI Pump and Valve Inservice Testing Program", under development prior to the I&E Inspection,

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was not yet completed when the inspection took place. The new administrative control procedure, has since been drafted and is now in the review cycle.

The IST procedure currently in effect, SP 21.010.01, "ASME Section XI Inservice Testing of Pumps," will be revised to reflect the requirements of the administrative control procedure.

Completion Target Date: April 30, 1983

XV. Item: No. 322/82-34-19 para 8.4.1
Issue: M&TE program procedure inadequate (Open)

Response

The experience gained during the time that the M&TE Program has been in effect has resulted in minor changes in the program's implementation that have improved the overall quality of the program. Each specific change in implementation was not recorded in a revision to SP 41.003.01 since the overall philosophy and guidance of the procedure was not altered.

A draft revision of SP 41.003.01 has been prepared and is in the review cycle. The revised version addresses the concerns described in paragraph 8.4.1.

Completion Target Date: February 15, 1983

XVI. Item: No. 322/82-34-25 para 11.4.2
Issue: Method must be established to assure T.S. changes are implemented by station procedures (Open)

Response

At the time of the inspection, LILCO was in the process of establishing measures to assure that technical specification changes would be implemented by station procedures. Those measures and resolution of this observation consist of three parts:

1. NOSD procedure No. 30 entitled "Shoreham Document Control Program" is currently being revised to ensure the control and distribution of copies of the Shoreham technical specifications.
2. NOSD Procedure 06 entitled "Maintenance, Revision, Approval and Control of License Documents" is currently being revised to describe the steps to be taken to revise or amend the Shoreham technical specifications.
3. The Plant Staff Technical Support Group is currently writing a station procedure that will provide a

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description outlining the detailed steps taken to ensure that amendments to the Shoreham Technical Specifications will be properly incorporated into applicable station procedures.

Completion Target Dates: 1. April 1, 1983
2. March 15, 1983
3. May 1, 1983

XVIII. Item: No. 322/82-34-12 para 6.4.2
Issue: Plant specific training of outside mechanics must be established (Open)

Response

LILCO is presently updating SP 31.001.01. The revision addresses the plant-specific training of contractors, mobile maintenance teams, and other outside workers who will be performing maintenance work on plant systems.

Completion Target Date: April 15, 1983.

Very truly yours,

M. S. Pollock

M. S. Pollock
Vice President-Nuclear

cc: Mr. J. Higgins
All Parties

STATE OF NEW YORK)
 : SS.:
COUNTY OF NASSAU)

MILLARD S. POLLOCK, being duly sworn, deposes and says that I am a Vice President of Long Island Lighting Company, the owner of the facility described in the caption above. I have read the table of unresolved issues and other open items dated January 3, 1983, and also the response thereto prepared under my direction dated February 10, 1983. 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 table and in said response. I believe the facts set forth in said response are true.

Millard S. Pollock

MILLARD S. POLLOCK

Sworn to before me this
15th day of February, 1983.

Rosa Lee Oliveros

ROSA LEE OLIVEROS
Notary Public, State of New York
No. 80-4700063
Qualified in Nassau County
Commission expires Mar. 30, 1987