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May 9, 1984

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FILE NO.

DIRECT DIAL NO. 202 955-

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Chairman Nunzio Palladino
U.S. Nuclear Regulatory Commission
1717 H Street, N.W.
Washington, D.C. 20555

Long Island Lighting Company
Shoreham Nuclear Power Station
Docket No. 50-322-OL-4 (Low Power)

Dear Chairman Palladino:

At Monday's oral argument, the Commission requested information concerning plants that have received operating licenses without full compliance with the NRC's regulations as applicable to full power operation. In addition to the cases cited in LILCO's and the Staff's comments to the Commission and discussed during the oral argument, a number of recent low power licenses have been issued with conditions that suggest less than full compliance with the NRC's full power regulations. A list of examples is attached.

The enclosed information was drawn from the licenses issued to the plants referenced. The license conditions generally do not cite the particular regulation requiring the condition nor do they describe the background of the condition. Consequently, the details of the license conditions were not readily available to LILCO. Nonetheless, the list does indicate that the NRC routinely assesses the need for full compliance with regulations written for full power operation in light of the activities authorized by the license. Whether this analysis was done pursuant to § 50.57(c), an exemption provision, or routine Staff practice for license conditions, it is precisely the type of analysis that was performed for Shoreham by the NRC Staff in approving LILCO's low power proposal. Though the precise facts for each license condition may differ,

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the analytical approach is well understood and frequently applied.

We hope this additional information is useful to the Commission.

Sincerely yours,

Anthony F. Earley, Jr. JAB
Anthony F. Earley, Jr.
Counsel for LILCO

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Attachment

cc: Commissioner James K. Asselstine
Commissioner Frederick M. Bernthal
Commissioner Victor Gilinsky
Commissioner Thomas M. Roberts
Service List

Examples of Conditions Imposed
on Recent 5% Operating Licenses

<u>Plant</u>	<u>License Condition</u>	<u>Completion Date</u>
La Salle 1 Grand Gulf 1	Pressure interlocks on valves at low/high pressure interfaces -- implement isolation protection	First refueling outage
LaSalle 1 St. Lucie 2 San Onofre 3 San Onofre 2 Grand Gulf 1	Reliability of diesel generators -- implement design modifications to install heavy duty turbocharger gear drive assembly and DC prelube pump, and to relocate instrumentation	First refueling outage
LaSalle 1 St. Lucie 2	Reactor containment electrical penetrations -- add fault current devices on each penetrating circuit	First refueling outage
LaSalle 1 Summer 1	Separation of Class 1E and Non-Class 1E cable trays -- provide adequate separation	First refueling outage
LaSalle 1	Fire protection program -- review certain doors and frames and certify their fire resistance ratings, or test "as installed" door design to determine rating, or replace doors	First refueling outage

<u>Plant</u>	<u>License Condition</u>	<u>Completion Date</u>
Susquehanna 1	Battery room area -- test installed one-hour cable wrap configuration or install automatic fire extinguishing system	Prior to exceeding five percent power
Susquehanna 1	Containment purge system -- install design features to prevent blocking of purge and vent valves by accident debris	First refueling outage
Susquehanna 1	Emergency diesel starting system -- install air dryers	First refueling outage
St. Lucie 2	Continuous containment purge system -- make modifications to insure operability in event of LOCA	Prior to exceeding five percent power
St. Lucie 2	Barrier for high energy equipment -- install barrier around transformer in cable spreading area	First refueling outage
McGuire 2 Summer 1	Thermal sleeves -- justify continued operation with thermal sleeves removed from RCS	Ten months after license for five percent power
McGuire 2	Hydrogen control measures -- install adequate system	First refueling outage

<u>Plant</u>	<u>License Condition</u>	<u>Completion Date</u>
San Onofre 3	Fire protection system -- install various detection/ extinguishing features and submit license amendment request to add to Tech. Specs.	Prior to exceeding five percent power
San Onofre 3	Qualification of auxiliary feedwater pump motor bearings -- propose a hardware modification and installation schedule	Prior to exceeding five percent power
San Onofre 2	Control room pressurization capability -- complete modifications for positive pressure capability in control room	6 months after license
San Onofre 2	Safety valve position indication -- environmentally and seismically qualify consistent with component to which attached	Prior to exceeding five percent power
Grand Gulf 1	Demonstrate 46 psig containment accident pressure capability	Prior to exceeding five percent power
Summer 1	Overpressurization protection -- install low-temperature overpressurization protection system	First refueling outage
Summer 1	Install source range neutron flux monitor to alternate shutdown system to comply with 10 CFR Part 50, Appendix R	First refueling outage

<u>Plant</u>	<u>License Condition</u>	<u>Completion Date</u>
Summer 1	Fire protection system --several exceptions to 10 CFR Part 50, App. R allowed	---
Summer 1	Fire protection system --install fire detection in several areas to comply with 10 CFR Part 50, Appendix R; in the interim establish 2-hr. fire watch	Prior to exceeding five percent power