LONG ISLAND LIGHTING COMPANY
SHOREHAM NUCLEAR POWER STATION
P.O. BOX 618, NORTH COUNTRY ROAD • WADING RIVER, N.Y. 11792

JOHN D. LEONARD, JR.
VICE PRESIDENT - NUCLEAR OPERATIONS

March 14, 1985

SNRC-1156

Dr. Thomas E. Murley
Regional Administrator - Region I
Office of Inspection and Enforcement
631 Park Avenue
King of Prussia, PA 19406

Response to Violations
Inspection Report 50-322/84-50
Shoreham Nuclear Power Station - Unit 1
Docket No 50-322

Reference: Letter from NRC (H. B. Kister) to LILCO (J. D. Leonard) dated February 14, 1985, forwarding Inspection Report 50-322/84-50

Dear Dr. Murley:

Attached (Attachment 1) please find LILCO's reply to the two violations cited in Appendix A of the reference letter.

We trust that this is satisfactory. Should you have any questions, please contact this office.

Very truly yours,

John D. Leonard, Jr.
Vice President - Nuclear Operations

RWG:ck

Attachment

cc: P. Eselgroth

IE01
1/1

ATTACHMENT 1
SNRC-1156

VIOLATION

A. 10 CFR 50, Appendix B, Criterion V, and Shoreham FSAR Section 17.2.5 requires that activities affecting quality be prescribed by, and accomplished in accordance with appropriate instructions, procedures, or drawings. Station Procedure No. 21.008.01, Operations Standing Orders, states that standing orders are provided at Shoreham Nuclear Power Station to provide written directives of continuing applicability to operations personnel for routine and certain non-routine activities or the conduct of operations and requires the Operating Engineer to submit these order to the Chief Operating Engineer or, in his absence, the Chief Technical Engineer for approval.

Contrary to the above, as of January 10, 1985, typewritten directives, approved only by the Operating Engineer in a binder entitled, "Operations Administrative Directives", were found in the Control Room covering the following types of activities:

- Maintaining systems operability status
- Annunciator status and response
- Operation of radwaste systems
- Surveillance Test Program

This is a Severity Level V violation (Supplement I)

Corrective Steps Which Have Been Taken and Results Achieved

Tne Operating Administrative Directives (OADS) were established with the intent of being used to distribute personnel administrative matters to members of the plant operations staff. The OADS were not intended to be used to distribute operating orders. As noted in the Inspection Report, the OADS were not being used as originally designed. When the discrepancy was brought to the attention of LILCO management on January 11, the OADS were immediately withdrawn from the Control Room.

Corrective Steps Which Will Be Taken To Prevent Recurrence

To prevent recurrence, the OADS will no longer be used to transmit any material to the Operations Staff. The mechanism for relaying the types of information that was in the OADS will be either the Night Orders or the Administrative Procedures both of which receive appr riate levels of review and approval.

Date When Full Compliance Will Be Achieved

The Plant was in compliance after the OADS were removed from the Control Room on January 11.

VIOLATION

B. 10 CFR 50, Appendix B, Criterion XVI and Shoreham FSAR Section 17.2.16 require that conditions adverse to quality be promptly identified and corrected.

Contrary to the above, as of January 3, 1985, there were 23 LILCO deficiency reports (LDRs) greater than 90 days old, having no Quality Assurance Department approved corrective action.

This is a Severity Level V violation (Supplement I)

Corrective Steps Which Have Been Taken and Results Achieved

The LILCO Deficiency Report (LDR) was the method adopted by Quality Assurance in 1976 to implement the requirements of 10 CFR 50 Appendix B, Criteria 15. The program that LILCO uses to document and track significant deficiencies or trends adverse to quality will continue to be the Corrective Action Request. This document requires timely response by noting a response date and, requires both corrective and preventive actions in accordance with the requirements of 10 CFR 50, Appendix B, Criteria 16 and FSAR Section 17.2.16. This program is described in the LILCO QA Manual and QA procedures.

The LDRs referenced in this response represent approximately 1% of the total LDRs issued by the QC Division, and were all issued prior to receipt of the operating license. During LILCO's review of this matter, it was determined that there were three additional LDR's greater than 90 days old, thus resulting in a total of 26 LDR's to be addressed.

The procedure for Quality Control Division LDRs was revised in December of 1984 to initiate 30 and 60 day letters noting undispositioned LDRs to upper management. This process began as scheduled in December, 1984. The corrective and preventive action planned by LILCO will continue to include this concept of notification for undispositioned LDRs.

In addition, the LDRs in question (see list and present status in Attachment 2) were divided into five categories and these categories evaluated for significance.

1. Procurement LDRs

The six LDRs in this category are examples of minor procedural discrepancies, part number changes, a failure to follow receiving procedures for non-safety related equipment and follow-up of items on QC "hold". These items involve non-repetitive activities, minor discrepancies and/or minor procedural discrepancies which do not constitute a pattern indicating significant adverse trends.

2. Measurement and Test Equipment (M&TE)/Calibration LDRs

The four LDRs in this category have all been dispositioned, accepted by QA, and do not represent significant recurring deficiencies. LDR-1844 was closed January 8, 1985, and LDR-2341 requires reverification of bolt torque values. During a recalibration the subject torque wrench was found out of tolerance by -2%. The expected completion date for this verification is April 15, 1985.

Research of the other two LDR's deficient conditions established that, for LDR-2403, the M&TE had not been used and, for LDR-2324, recalibration did not reflect any out of tolerance condition.

3. Damaged and Missing Equipment

Damaged Equipment

Station Modification (SM) 84-028 was initiated by L-E&DCR L-432 on February 17, 1984. The station modification was designed to allow control of emergency diesel generator jacket water temperature at low EDG power levels by temporarily removing thermal relief valve internals assuring constant flow through the cooler. This was a temporary solution and Engineering Evaluation and Assistance Request (EEAR) 84-086 was initiated by the plant on February 24, 1984 to address a permanent solution.

During implementation of SM 84-028 it was noted that the valve internals were damaged and this was documented in LDR-2155 and LDR-2215. As the damaged components were those to be removed per the station modification the immediate action had been prompt and correct. The LDR's were issued to document the as-found condition. The final disposition was pending the issuance of the engineering package associated with the EEAR.

Station Modification 84-028 was completed on March 15, 1984 and its three associated MWR's, 84-1380, 1419, and 1420, were returned to service with all damaged components properly removed.

The LDR's were not dispositioned until Engineering scheduled EEAR 84-086 to be worked in the third quarter of 1985. Physical work and testing will be completed after the final design package is issued.

Missing Equipment

LDR 2092 identified four (4) missing conduit supports and braces. Disposition was to install above per E&DCR's F-40265E and F-42070A, on March 14, 1984. Above work was assigned a low priority, during a period where EMD diesel generators and other high priority items were being worked. MWR 84-4907 was

written to Maintenance to perform the work on August 27, 1984. The MWR was put on hold due to Maintenance constraints. A requisition was written (S-06639) on December 4, 1984, and is currently in engineering technical review. As soon as the purchase order is issued and the material is received the MWR will be worked.

4. Procedural LDRs

Of the nine LDRs in this category, seven have been closed and the two remaining have now been dispositioned.

The LDRs did not include repetitive type deficiencies and did not represent a significant adverse quality trend. The deficiencies identified the processing of revisions to station procedures, inspections of non-safety related welds, auxiliary boiler chemistry, housekeeping, identification of a non-safety related valve operator, approval, by procedurally unauthorized personnel, of weld requisitions, and minor repair/replacement procedural discrepancies.

5. Bahnson LDRs

The Bahnson HVAC LDRs represent a single engineering evaluation effort by LILCO. These LDRs are the result of possible nonconformances in Bahnson's air conditioning units (ACU's) as identified by IE Notice 84-30 and are being tracked separately by LILCO and the NRC under Inspection Item 84-29-01.

Corrective Steps Which Will Be Taken To Prevent Recurrence

In addition to the procedural changes for 30 and 60 day letters, if a LDR has remained unanswered after 90 days, the QA Manager will transmit a request to the responsible action party requesting evaluation of LDR significance and information concerning an estimated completion date. Included will be a notification of this action to the Vice President of Nuclear Operations and the Director, Quality Assurance Safety and Compliance. Failure to respond to this request will result in the issuance of a Corrective Action Request.

Date When Full Compliance Will Be Achieved

The ninety (90) day notification described above will be in effect April 1, 1985. The status of compliance for the various categories of LDR's was described above. In addition, the attached Table, "NRC Report/LDR Status", provides the current status of each individual LDR.

Attachment 2
SNRC-1156

NRC REPORT
LDR Status as of 3/14/85

	LDR #	Safety Related	Year Issued	Disposition to QCD	Disposition Accepted QCD	Date LDR Closed	Remarks
1.	Procurement						
	1.1 1840	*	1983	Yes	Yes	2/27/85	
	1.2 2352		1984	No			Requires Purchasing input
	1.3 2368	*	1984	No			NED letter 2/26/85. Disposition in progress.
	1.4 2379	*	1984	No			
	1.5 2457		1984	No			Working on cleanup of Hold area in LILCO Warehouse
	1.6 2485		1984	Yes	Yes	2/12/85	
2.	M&TE/Calib.	*					
	2.1 1844	*	1983	Yes	Yes	1/8/85	
	2.2 2324	*	1984	Yes	Yes		Review for closure
	2.3 2341	*	1984	Yes	Yes		Verification of torque values
	2.4 2403		1984	Yes	Yes	2/18/85	
3.	Damaged/Miss. Equip.	*					
	3.1 2092	*	1984	Yes	Yes		Maintenance Work Request 84-4097 issued
	3.2 2155	*	1984	Yes	Yes		Engineering Evaluation and Analysis
	3.3 2215		1984	Yes	Yes		Report 84-086 issued.
4.	Procedures	*					
	4.1 1538	*	1983	Yes	Yes	1/8/85	
	4.2 1736	*	1983	Yes	Yes	1/14/85	
	4.3 1759	*	1983	Yes	Yes	1/8/85	
	4.4 1982		1984	Yes	Yes	1/8/85	
	4.5 2355	*	1984	Yes	Yes	2/27/85	
	4.6 2455	*	1984	Yes	Yes	2/19/85	
	4.7 2466	*	1984	Yes	Yes		Warehouse Roof Leak Repair
	4.8 2488		1984	Yes	Yes	3/7/85	
	4.9 1928		1983	Yes	Yes		
5.	Bahnson ACU's	*					
	5.1 2470	*	1984	Yes	No		Site Engineering office completed
	5.2 2471	*	1984	Yes	No		evaluation. Sent to QCD to review
	5.3 2472	*	1984	Yes	No		for disposition acceptance.
	5.4 2473		1984	Yes	No		