



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

June 21, 1985

SNRC-1184

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Generic Letter 83-28 "Required Actions Based on
Generic Implications of Salem ATWS Events"
Second Submittal of Additional Information
Shoreham Nuclear Power Station - Unit 1
Docket No. 50-322

Reference: 1) LILCO letter, SNRC-1116 (J. D. Leonard, Jr.) to
the NRC (H. R. Denton), dated December 4, 1984
2) NRC letter (A. Swencer) to LILCO (J. D.
Leonard, Jr.), dated April 11, 1985

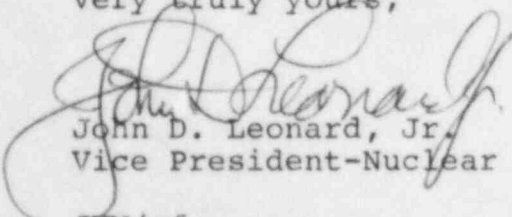
Dear Mr. Denton:

The second LILCO response to Generic Letter 83-28 (Reference 1)
addresses Items 1.1.1, 1.1.3, 1.1.5, 2.1.1, 2.2.2 and 4.5 in order
to satisfy previous commitments made by LILCO. In Reference 2,
the NRC stated that the LILCO response was considered to be
incomplete and additional information was requested. This letter
is intended to clarify and supplement the LILCO response of
Reference 1. Clarification and additional information is provided
in the enclosed Attachment I, on the following items:

Item 2.1.1	VENDOR INTERFACE (Reactor Trip System)
Item 2.2.2	VENDOR INTERFACE (Safety Related Equipment)
Items 4.5.1 and 4.5.2	REACTOR TRIP SYSTEM FUNCTIONAL TESTING
Item 4.5.3	REVIEW OF TECHNICAL SPECIFICATION TESTING INTERVALS

I trust that the additional information provided herein will
satisfy the NRC concerns expressed in Reference 2.

Very truly yours,


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

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JVW/cf
Attachment
cc: P. Eselgroth

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ATTACHMENT I

CLARIFICATION OF RESPONSES TO GENERIC LETTER 83-28

In the Reference 2 letter, the NRC indicated that it may be useful for LILCO to take advantage of efforts by Owners Groups, Institute of Nuclear Power Operations (INPO) and NSSS Vendors to provide generic responses in meeting the requirements of Generic Letter 83-28, Items 2.1, 2.2.2, and 4.5.3. The following discussion, Item by Item, shows how LILCO intends to use this recommendation to supplement and improve the program.

Item 2.1.1 VENDOR INTERFACE (Reactor Trip System)

The Reactor Trip System (RTS) is comprised primarily of reactor vendor items, however, the system does have some non-GE components. Thus the LILCO effort to increase the efficiency of the interchange of information on the RTS must include concern for GE items and non-GE items. As explained in Reference 1, LILCO has a direct line of communication with General Electric Company (our NSSS vendor) on GE service advisory programs in the areas of safety-related systems and components and non-safety related equipment reliability. These reactor vendor programs include 10CFR21 reporting and direct customer communication on urgent items.

For the exchange of information concerning the reliability of safety related components on non-GE items in the RTS, the INPO Nuclear Utility Task Action Committee (NUTAC) program, as endorsed by LILCO, addresses the NRC concerns in a most effective manner. The explanation of the NUTAC program provided below is a clarification and explanation of information previously provided.

The NUTAC Vendor Equipment Technical Information Program (VETIP) includes interactions among the major organizations involved with commercial nuclear power generation. Typically, utilities exchange safety-related equipment information with vendors, NRC, INPO, and other utilities via reports, bulletins, notices, newsletters, and meetings. The purpose of these informational exchanges is to share equipment technical information to improve the safety and reliability of nuclear power generating stations. The NUTAC concluded that the lack of information is not a problem, but that the various information systems available are not integrated properly. The purpose of the VETIP is to ensure that current information and data will be available to those personnel responsible for developing and maintaining plant instructions and procedures. The VETIP is an industry-controlled and mainly hardware-oriented program that does not rely on vendor action, other than the NSSS supplier, to provide information to utilities, as most vendors do not have an internal program to gather and disseminate equipment-related technical information. In an effort to integrate the safety related equipment vendor into the program, the VETIP provides information developed by industry experience through SERs and SOERs to the vendor for comment before it is circulated to the utilities concerned.

The variations in plant vintage and design, in conjunction with the magnitude of vendors and safety related components involved, places the utility in an unique position. The utility user alone has immediate access to the maintenance and surveillance history of the equipment. The utility, not the manufacturer, knows the component's actual application and environment. The utility is the primary source of information on the failure, and has the greatest need for the solution. As such, the utility is the central organizer in any approach to the solution, whether or not the manufacturer elects to become involved. The utility is in the position to know of the failure analysis and its solution at the earliest possible time. The utility can then disseminate the information to other utilities, with an indication of its significance and urgency. By sharing the operating history, problems, and solutions within the nuclear industry, independent of any normal vendor contracts, the other users will be informed in a much more timely and uniform way. In this way, the distribution of information is controlled entirely by the nuclear utility industry.

Item 2.2.2 VENDOR INTERFACE (Safety Related Equipment)

The objective of Generic Letter 83-28, Section 2.2.2 is to improve the safety and reliability of nuclear power generating stations by assuring that the utilities are provided with timely, significant technical information concerning the reliability of safety related components. As stated above, the NUTAC program as endorsed by LILCO, addresses the NRC concerns in the most effective manner.

The response provided herein for Item 2.1.1 concerning the NUTAC VETIP program is, of course, applicable to this item (2.2.2) since the scope of coverage is vendor supplied equipment as opposed to equipment from the NSSS supplier.

Since the NUTAC VETIP program and its applicability to LILCO is completely explained in Item 2.1.1, no further explanation is appropriate.

Item 4.5.1 and 4.5.2 REACTOR TRIP SYSTEM FUNCTIONAL TESTING

The NRC has provided in Reference 2 the requested exemption from the requirement for on-line functional testing of SNPS backup scram valves. LILCO will recommend an appropriate change to the SNPS Technical Specifications which will incorporate the requirement for testing the backup scram valves during each refueling outage.

Item 4.5.3 REVIEW OF TECHNICAL SPECIFICATION TESTING INTERVALS

- A. LILCO has taken action to become a voting member of the BWR Owners Group Technical Specification Improvement Committee (TSIC). The necessary internal administrative procedures to accomplish this are expected to be completed in approximately one month.

- B. LILCO is currently performing a review of the BWR Owners Group response to Item 4.5.3 (NEDC-30844) with the purpose of determining if LILCO can endorse the response as submitted. This activity is expected to take approximately one month. LILCO intends, barring any unexpected obstacles to endorsement, to provide a plant specific response to Item 4.5.3 within 90 days after NRC completes its review and issues its evaluation of NEDC-30844. This intended action on LILCOs part is in support of the NRC request for action to meet its schedule.