



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

May 14, 1985

SNRC-1174

Dr. Thomas E. Murley
Regional Administrator
Office of Inspection and Enforcement
Region I
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

Leakage Reduction Program, Personnel
Qualifications and Training
Shoreham Nuclear Power Station
Docket No. 50-322

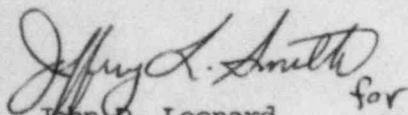
Reference: Letter from NRC (Stewart D. Ebneter) to Lilco (J. D. Leonard)
dated 4-15-85 including Appendices A & B, Notices of Violation and
Deviation, and NRC Inspection Report 50-322/85-08.

Dear Dr. Murley:

The attached information (Attachment I) is being forwarded in response to the
reference letter. This attachment addresses the subject notices of violation and
deviation in accordance with NRC instructions.

Should you have any questions, please contact this office.

Very truly yours,


for

John D. Leonard
Vice President-Nuclear Operations

DRH/cf

Attachment

cc: P. Eselgroth

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PART 2

Additionally, the established program for the remaining nine systems lacked:

1. Procedural steps for Technical Specification paragraph 6.8.4a.1 required visual inspections and for NDE surface emission bubble testing per SP No. 84.002.01, Revision 1;
2. Definition of parameters such as Test Pressure;
3. Acceptance Criteria for leakage rates;
4. Requirements for Test Personnel Qualifications; and
5. Requirements for retest after repair.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED.

1. Procedural Steps for Technical Specification Paragraph 6.8.4a.1 Required Visual Inspections and for NDE Surface Emission Bubble Testing per SP No. 84.002.01, Revision 1;

Emission Bubble Testing is not used to quantify leak rates on systems. Make-up flow rate measurements are used to quantify system leakage. Bubble checks are only used to locate sources of leakage. As such, no procedure for NDE surface emission bubble testing is required.

2. Definition of Parameters Such as Test Pressure;
None
3. Acceptance Criteria for Leakage Rates;

FSAR Section III.D.1.1 states that LILCO will identify the leakage criteria to be applied during the first fuel cycle in a report to be submitted to the NRC staff before full power operations. In the interim, the Leakage Reduction and Control program procedures have been revised to state that any leakage found under this program will be documented and a Maintenance Work Request (MWR) initiated.

4. Requirements for Test Personnel Qualifications;
None
5. Requirements for Retest After Repair.
None

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS.

1. Procedural Steps for Technical Specification Paragraph 6.8.4a.1
Required Visual Inspections and for NDE Surface Emission Bubble Testing
per SP No. 84.002.01, Revision 1;

Periodic visual inspections for those systems listed on FSAR table III.D.1.1-1 as requiring such tests will be incorporated into the Leakage Reduction and Control program. These tests will be done in conjunction with the Inservice Test Program. The procedures will be revised by July 2, 1985.

2. Definition of Parameters such as Test Pressure;

SP84.002.01 now requires the various systems to be in a specified operating mode during the inspections. The procedure will be revised to list the specific Operating procedures to be used to place the system in the required mode. Also the procedure will be revised to require that operating pressures be logged when the inspection is performed. These procedure changes will be completed by July 2, 1985.

3. Acceptance Criteria for Leakage Rates:

As stated above, the procedures have been revised to require an MWR for any leakage found under this program. The procedures will be further revised to require the completion of these MWRs within 30 days unless the Maintenance Division Manager approves the extension and documents why the extension is appropriate. Thus the goal of the program is zero leakage, with documentation of any leakage existing for more than 30 days.

4. Requirements for Test Personnel Qualifications;

SP 12.003.01, "Personnel Qualifications and Training," governs the qualifications of the plant staff personnel. The NRC Inspector did review this procedure as part of his inspection on the Leakage Reduction and Control program as documented in section 2.3.6 of his report. The Leakage Reduction and Control procedures will be revised to reference this procedure. The revision will be complete by July 2, 1985.

5. Requirements for Retest after Repair.

The Leakage Reduction and Control procedures will be revised to state explicitly that any repair done under this program will require a retest of the repaired component(s). The retest will be done at the system operating pressures existing at the time the leak was found, but will not necessarily require a full system retest. Local retest of the component will be acceptable. The revision to the procedures will be completed by July 2, 1985.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED.

Full compliance for this portion of the violation will be completed by July 2, 1985.

NOTICE OF DEVIATION

FSAR Section 17.2.2 identifies the QA Manual as the document which establishes the requirements for quality - affecting activities during the operational phase.

The LILCO QA Manual, section 2.1.3, states, "Appendix E of this QA Manual identifies the NRC Regulatory Guides and ANSI Standards which apply to the QA program". Appendix E lists Regulatory Guide 1.58, Qualification of Nuclear Power Plant Inspection, Examination and Testing Personnel, dated August 1973, which makes ANSI Standard N45.2.6 dated 1973 applicable to Shoreham.

The QA Manual, Section 11.3.5, further states, "Test personnel are currently and properly qualified" and Section 16.3.3 states "...prompt...corrective action...shall include...measures to preclude recurrence of the condition."

Contrary to the above commitments:

PART 1

The procedure (SP No. 12.003.01, Revision 12) addressing qualifications of test personnel used ANSI N45.2.6 - 1978. This was not the QA Program specified standard ANSI N45.2.6-1973.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND RESULTS ACHIEVED

A procedure change has been drafted for Station Procedure SP 12.003.01 to reflect Appendix E of the QA Manual (R.G.1.58) as providing the standard applicable to Shoreham.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER DEVIATIONS

SP 12.003.01 is being revised as noted above and will be utilized at SNPS upon approval.

DATE WHEN CORRECTIVE ACTION WILL BE COMPLETED

Revised Station Procedure SP 12.003.01 is scheduled to be approved by June 1, 1985.

PART 2

One "Certification of Qualification" for a Level I Examination/Inspection Technician was (approved) certified, however, it was not properly completed in that it was without a verification of a required eye examination.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND RESULTS ACHIEVED

The "Certification of Qualification" for the specific Level I Examination/Inspection Technician has been reissued with verification properly completed.

In addition, the responsibility for ensuring that future certifications are properly completed has been specifically assigned to one person, the Nuclear Training Administrator.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER DEVIATIONS

LILCO is in the process of reviewing current certification forms to ensure that those currently in the training record folders are properly completed.

DATE WHEN CORRECTIVE ACTION WILL BE COMPLETED

The Nuclear Training Administrator was assigned the responsibility to review new certifications in January, 1985 (Full compliance achieved). The review of current certifications is in process and will be completed by July 1, 1985.

PART 3

Corrective action for conditions adverse to quality had not been promptly taken in that when inspected on January 31, 1985, seven employee's training qualification history records either had no Eye Test Certificate (SP No. 12.0003.01, Appendix 12.5) or a valid up to date annual certificate. A LILCO QA Audit No. 84-03 dated June 15, 1984, identified a similar condition of either five missing or out of date Eye Test Certificates (different names than identified by this inspection) required to support personnel qualifications and the condition was not corrected.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

As noted in Inspection Report 85-08, the Manager of the Nuclear Training Division took prompt corrective action in that, a) he verified that the LILCO Medical Department in Hicksville, Long Island, had valid eye examination records in their files and, b) he requested that records for future eye examinations performed in Hicksville be provided to the Nuclear Training Administrator.

Subsequently valid eye examination records (for personnel whose eye test had been performed in Hicksville) have been obtained and filed in the training folders at Shoreham.

The issue of a missing verification signature on the "Certification of Qualification" form was addressed in Part 2 above.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER DEVIATIONS

LILCO is in the process of reviewing the training records to verify the presence of valid eye test certificates.

DATE WHEN CORRECTIVE ACTION WILL BE COMPLETED

The review of training records noted above will be completed by July 1, 1985.

ATTACHMENT I

NOTICE OF VIOLATION

Technical Specification 6.8.4 states that programs shall be established, implemented and maintained to reduce leakage from twelve primary coolant system sources outside containment, including portions of Reactor Building Floor Drains and Reactor Building Standby Ventilation System.

PART 1

Contrary to the above, as of January 28, 1985, the licensee had not established a program to reduce leakage from those portions of the Reactor Building Floor Drains, Reactor Building Equipment Drains, and Reactor Building Standby Ventilation System outside containment.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED.

As stated in the NRC Inspection report section 2.3.2, a revision to the procedure used to implement the Leakage Reduction and Control Program was in progress at the beginning of the inspection period, and was, as documented in the NRC report, approved on January 29, 1985 during the inspection period. This revision added the systems noted in the violation to the procedure. However, as was documented to the Inspector during the inspection, this did not mean that these systems were not being monitored. The NRC Inspection Report stated in section 2.3.3 that the Inspector had reviewed test results on the Reactor Building Standby Ventilation System done in accordance with SP74.030.02 during his inspection. Corrective actions for this part of the violation were completed by the end of the Inspection period.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS.

The revision to the procedure described above will avoid further violations.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED.

Full compliance for this portion of the violation was achieved on January 29, 1985.