

ENCLOSURE

CONFORMANCE TO GENERIC LETTER 83-28
ITEMS 3.1.3 AND 3.2.3
DRESDEN UNIT NOS. 2 AND 3, MILLSTONE UNIT NO. 1
MONTICELLO, PILGRIM, QUAD CITIES UNIT NOS. 1 AND 2

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ABSTRACT

This EG&G Idaho, Inc. report provides a review of the submittals for several nuclear plants for conformance to Generic Letter 83-28, items 3.1.3 and 3.2.3. The specific plants reviewed were selected as a group because of similarity in type and applicability of the review items. The group includes the following plants:

<u>Plant</u>	<u>Docket Number</u>	<u>TAC Numbers</u>
Dresden 2	50-237	52995, 53833
Dresden 3	50-249	52996, 53834
Millstone 1	50-245	53016, 53855
Monticello	50-263	53018, 53857
Pilgrim	50-293	53029, 53868
Quad Cities 1	50-254	53034, 53873
Quad Cities 2	50-265	53035, 53874

FOREWORD

This report is supplied as part of the program for evaluating licensee/applicant conformance to Generic Letter 83-28 "Required Actions based on Generic Implications of Salem ATWS Events." This work is conducted for the U.S. Nuclear Regulatory Commission, Office of Nuclear Reactor Regulation, Division of System Integration by EG&G Idaho, Inc., NRC Licensing Support Section.

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CONFORMANCE TO GENERIC LETTER 83-28

ITEMS 3.1.3 AND 3.2.3

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MONTICELLO, PILGRIM, QUAD CITIES UNIT NOS. 1 AND 2

1. INTRODUCTION

On July 8, 1983, Generic Letter No. 83-28¹ was issued by D. G. Eisenhut, Director of the Division of Licensing, Nuclear Reactor Regulation, to all licensees of operating reactors, applicants for operating licenses, and holders of construction permits. This letter included required actions based on generic implications of the Salem ATWS events. These requirements have been published in Volume 2 of NUREG-1000, "Generic Implications of ATWS Events at the Salem Nuclear Power Plant".²

This report documents the EG&G Idaho, Inc. review of the submittals from Dresden Units Nos. 2 and 3, Millstone Unit No. 1, Monticello, Pilgrim, and Quad Cities Unit Nos. 1 and 2 for conformance to items 3.1.3 and 3.2.3 of Generic Letter 83-28. The submittals from the licensees utilized in these evaluations are referenced in section 10 of this report.

These review results are applicable to the group of nuclear plants previously identified because of their similarity. These plants are similar in the following respects.

1. They are operating GE-BWR reactors
2. They utilize the MARK 1 Containment and Pressure Suppression Systems
3. They are 1965 and 1966 (Model 3) reactors
4. They utilize two class 1E Power System Trains
5. They use relay logic in the Reactor Trip Systems.

An item of concern identified for any one of these plants is assumed to be potentially significant for all of the plants in the group.

2. REVIEW REQUIREMENTS

Item 3.1.3 (Post-Maintenance Testing of Reactor Trip System Components) requires licensees and applicants to identify, if applicable, any post-maintenance test requirements for the Reactor Trip System (RTS) in existing technical specifications which can be demonstrated to degrade rather than enhance safety. Item 3.2.3 extends this same requirement to include all other safety-related components. Any proposed technical specification changes resulting from this action shall receive a pre-implementation review by NRC.

3. GROUP REVIEW RESULTS

The relevant submittals from each of the named reactor plants were reviewed to determine compliance with items 3.1.3 and 3.2.3 of the Generic Letter. First, the submittals from each plant were reviewed to determine that these two items were specifically addressed. Second, the submittals were checked to determine if there were any post-maintenance test items specified by the technical specifications that were suspected to degrade rather than enhance safety. Last, the submittals were reviewed for evidence of special conditions or other significant information relating to the two items of concern. The results of this review are summarized for each plant in Table 1.

With the exception of the response for the Pilgrim Station, all of the responses indicated that there had been no items identified from the licensees review of the technical specifications relating to post-maintenance testing that could be demonstrated to degrade rather than enhance safety. However, the licensees gave no insight on the depth of review conducted on these two items.

The response for Monticello indicated that the licensee had based his evaluation on an incomplete review of the technical specification requirements and is taking the position that no further review or action is required for the two items since the partial reviews had identified no

post-maintenance testing requirements that degrade rather than enhance safety of the reactor trip system or other safety-related components.

The licensee's response for Pilgrim Station did not address the central issue of items 3.1.3 and 3.2.3, i.e., to identify any post-maintenance test requirements in existing technical specifications which can be demonstrated to degrade rather than enhance safety of the reactor trip system and other safety related components.

The BWR Owners Group is presently addressing Generic Letter 83-28 item 4.5.3³ which may result in proposed changes to the technical specification requirements for surveillance testing frequency and out-of-service intervals for testing and post-maintenance testing. The primary concern of item 4.5.3 is the surveillance testing intervals. Items 3.1.3 and 3.2.3 are specifically directed at post-maintenance test requirements. These concerns are essentially independent. However, the evaluations of these concerns are coordinated so that any correlation between these concerns will be adequately considered. Since no specific proposal to change the technical specifications has been proposed, there is no identifiable need at this time for correlating the reviews of item 4.5.3 with this review.

TABLE 1.

Plants	Were Items 3.1.3 and 3.2.3 Addressed in the Submittal	Licensee Findings	Responses Acceptable	Comments
Dresden 2 and 3	Yes	No tech. spec. items identified that degrade safety	Yes	--
Millstone 1	Yes	No tech. spec. items identified that degrade safety	Yes	--
Monticello	Yes	--	No	Reviews not complete, however, licensee's position is that no further action would be required.
Pilgrim	Yes	--	No	The licensee has not provided an evaluation response.
Quad Cities 1 and 2	Yes	No tech. spec. items identified that degrade safety	Yes	--

4. REVIEW RESULTS FOR MILLSTONE 1

4.1 Evaluation

Northeast Utilities, the licensee for Millstone Nuclear Power Station Unit No. 1, provided responses to items 3.1.3 and 3.2.3 of Generic Letter 83-28 on November 8, 1983.⁵ Within the responses, the licensee's evaluation for items 3.1.3 and 3.2.3 is that no technical specification requirements for post-maintenance testing have been identified which will result in degraded safety of the reactor trip system and other safety-related components. The licensee has committed to continuously review incoming vendor information and engineering recommendations with respect to impact on component reliability. Should the potential for degradation of safety due to post-maintenance test requirements be identified, the licensee will submit appropriate changes and justification for NRC approval.

4.2 Conclusion

Based on the licensee's statement that they have reviewed their technical specifications for post-maintenance testing that could degrade rather than enhance safety and found none that degraded safety, we find the licensee's responses acceptable. The licensee's commitment to continuously review incoming vendor information and engineering recommendations for information that could identify instances of potential degradation of safety caused by post-maintenance testing requirements provides additional assurance that the technical specifications will continue to provide a basis for safe plant operation and is acceptable.

10. REFERENCES

1. NRC Letter, D. G. Eisenhower to all Licensees of Operating Reactors, Applicants for Operating License, and Holders of Construction Permits, "Required Actions Based on Generic Implications of Salem ATWS Events (Generic Letter 83-28)", July 8, 1983.
2. Generic Implications of ATWS Events at the Salem Nuclear Power Plant, NUREG-1000, Volume 1, April 1983; Volume 2, July 1983.
3. BWR Owners' Group Responses to NRC Generic Letter 83-28, Item 4.5.3, General Electric Company Proprietary Information, NEDC-30844, January 1985.
4. Commonwealth Edison letter to NRC, P. L. Barnes to H. R. Denton, Director, Office of Nuclear Reactor Regulation, NRC, "Dresden Station Units 2 and 3, Quad Cities Station Units 1 and 2, Zion Station Units 1 and 2, LaSalle County Station Units 1 and 2, Byron Station Units 1 and 2, Braidwood Station Units 1 and 2, Response to Generic Letter No. 83-28, NRC Docket Nos. 50-237/249, 50-254/265, 50-295/304, 50-373/374, 50-454/455, and 50-456/457," November 5, 1983.
5. Northeast Utilities letter to NRC, W. G. Council to D. G. Eisenhower, Director, Division of Licensing, NRC, "Haddam Neck Plant, Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3, Response to Generic Letter 83-28, Generic Implications of Salem ATWS Events," November 8, 1983.
6. Northern States Power Company letter to NRC, D. Musolf to Director, Office of Nuclear Reactor Regulation, NRC, "Monticello Nuclear Generating Plant, Docket No. 50-263, License No. DPR-22, Generic Implications of Salem ATWS Events. (Generic Letter 83-28)", November 14, 1983.
7. Boston Edison Company letter to NRC, W. D. Harrington to D. B. Vassallo, Chief, Operating Reactors Branch No. 2, Division of Licensing, NRC, "Response to Generic Letter 83-28", November 7, 1983.