

NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
HOLYOKE WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

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September 9, 1985

Docket No. 50-245
B11676

Director of Nuclear Reactor Regulation
Attn: Mr. Christopher I. Grimes, Chief
Systematic Evaluation Program Branch
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

- References: (1) J. F. Opeka letter to C. I. Grimes, dated May 17, 1985.
(2) H. L. Thompson letter to J. F. Opeka, dated July 31, 1985.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 1
Integrated Safety Assessment Program

In Reference (1), Northeast Nuclear Energy Company (NNECO) provided a proposed scope for the Integrated Safety Assessment Program (ISAP) review of Millstone Unit No. 1. In Reference (2), the Staff formally issued the results of the ISAP screening review process, establishing the scope of ISAP for Millstone Unit No. 1 and initiating issue-specific evaluations. Reference (1) also indicated that for each issue or topic included in ISAP, NNECO would provide a discussion of the safety objective and an evaluation of the plant design with respect to the issue being addressed to identify specific items to be considered in the integrated assessment. In accordance with this commitment, reviews for the following ISAP topics are attached:

- o ISAP Topic 1.26 - "Item 2.1, Equipment Classification/Vendor Interface"
- o ISAP Topic 1.27 - "Items 3.1.1 and 3.1.2, Post-Maintenance Testing"
- o ISAP Topic 1.28 - "Item 3.1.3, Post-Maintenance Testing TS Changes"
- o ISAP Topic 1.30 - "Item 1.2, Post-Trip Review Data and Information"
- o ISAP Topic 1.31 - "Item 2.2, Equipment Classification/Vendor Interface"
- o ISAP Topic 1.32 - "Items 3.2.1 and 3.2.2, Post-Maintenance Testing"
- o ISAP Topic 1.33 - "Item 3.2.3, Post-Maintenance Testing TS Changes"
- o ISAP Topic 1.34 - "Items 4.5.2 and 4.5.3, Reactor Trip System Testing"
- o ISAP Topic 1.35 - "Item 4.5.1, Reactor System Functional Testing"

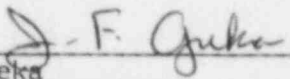
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If you have any questions concerning the attached reviews, please contact us.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



J. F. Opeka
Senior Vice President

cc: J. A. Zwolinski

ISAP TOPIC NOS. 1.26 THROUGH 1.28
AND 1.30 THROUGH 1.35

REQUIRED ACTIONS BASED ON GENERIC IMPLICATIONS
OF SALEM ATWS EVENTS (GENERIC LETTER 83-28)

I. Introduction

As a result of the February 22 and February 25, 1983 anticipated transient without scram (ATWS) events at the Salem Nuclear Power Plant, the NRC initiated an evaluation to determine the generic implications of these events. The results of this evaluation were reported in NUREG-1000, "Generic Implications of ATWS Events at the Salem Nuclear Power Plant." On July 8, 1983, the NRC issued Generic Letter 83-28, "Required Actions Based on Generic Implications of Salem ATWS Events." The actions required of licensees by Generic Letter 83-28 were developed based on information contained in NUREG-1000 and address issues related to reactor trip system reliability and general management capability.

The actions covered by Generic Letter 83-28 may be categorized as follows:

- (1) post-trip review;
- (2) equipment classification and vendor interface;
- (3) post-maintenance testing; and
- (4) reactor trip system reliability

The objective of ISAP Topics 1.26 through 1.28 and 1.30 through 1.35 is to review plant design as well as utility programs and procedures against the requirements of Generic Letter 83-28. For convenience, the following sections have been formatted to address each ISAP topic individually.

II. ISAP Topic 1.26, Equipment Classification/Vendor Interface

A. Review Criteria

1. Topic 1.26 corresponds to Position 2.1, "Equipment Classification and Vendor Interface (Reactor Trip System Components)," of Generic Letter 83-28.

B. Related Topics/Interfaces

ISAP Topic 1.18, Anticipated Transient Without Scram (ATWS)
ISAP Topic 1.27, Post-Maintenance Testing Procedures
ISAP Topic 1.28, Post-Maintenance Testing Technical Specification Changes
ISAP Topic 1.30, Post-Trip Review Data and Information
ISAP Topic 1.31, Equipment Classification/Vendor Interface
ISAP Topic 1.32, Items 3.2.1 and 3.2.2, Post-Maintenance Testing Procedures
ISAP Topic 1.33, Item 3.2.3, Post-Maintenance Testing Technical Specification Changes
ISAP Topic 1.34, Items 4.5.2 and 4.5.3, Reactor Trip System Testing
ISAP Topic 1.35, Item 4.5.1, Reactor System Functional Testing
ISAP Topic 1.43, Technical Specification for Anticipatory Trips
ISAP Topic 2.17, Reactor Protection Trip System

C. Evaluation

Generic Letter 83-28 requires licensees to:

- (1) Confirm that all components whose functioning is required to trip the reactor are identified as safety-related on documents, procedures and information handling systems used in the plant to control safety-related activities, including maintenance, work orders and parts replacement; and
- (2) Establish, implement and maintain a continuing program to ensure that vendor information is complete, current and controlled throughout the life of the plant, and appropriately referenced or incorporated in plant instructions and procedures.

At Millstone Unit No. 1 components required for reactor trip are identified as safety-related on documents, procedures and information handling systems used in the plant to control safety-related activities. These components are currently identified on the Category 1 Material, Equipment and Parts List (MEPL) and will be identified on the Production Maintenance Management System (PMMS) data base, which will replace the document form of the MEPL.

Millstone Unit 1 considers the Vendor Equipment Technical Information Program (VETIP), as defined in the March 1984 NUTAC report to be a valid response to the requirements of Position 2.2, part 2.2.2. The program, as described in the NUTAC report has been implemented to the extent practical. Although not directly under the purview of the NUTAC, the similarity of the vendor interface requirements of Position 2.1 to those of Position 2.2 indicate the applicability of the VETIP to both positions.

D. Conclusions

The Millstone Unit No. 1 response (References 4 and 6) to Generic Letter 83-28 is complete.

At this time, there are no outstanding NRC requests for additional information. The results of the NRC's evaluation of the Millstone Unit No. 1 response have not yet been received.

E. References

1. Section 2.3.1 of NUREG-1000.
2. Section 2.3.2 of NUREG-1000.
3. Generic Letter 83-28, dated July 8, 1983.
4. W. G. Counsil letter to D. G. Eisenhut, dated November 8, 1983.
5. J. A. Zwolinski letter to W. G. Counsil, dated March 5, 1985.
6. J. F. Opeka letter to J. R. Miller, dated May 9, 1985.

III. ISAP Topic 1.27, Post-Maintenance Testing Procedures

A. Review Criteria

1. Topic 1.27 corresponds to Position 3.1, "Post-Maintenance Testing (Reactor Trip System Components)," parts 3.1.1 and 3.1.2 of Generic Letter 83-28.

B. Related Topics/Interfaces

ISAP Topic 1.18, ATWS
ISAP Topic 1.26, Equipment Classification/Vendor Interface
ISAP Topic 1.28, Post-Maintenance Testing Technical Specification Changes
ISAP Topic 1.30, Post-Trip Review Data and Information
ISAP Topic 1.31, Equipment Classification/Vendor Interface
ISAP Topic 1.32, Items 3.2.1 and 3.2.2, Post-Maintenance Testing Procedures
ISAP Topic 1.33, Item 3.2.3, Post-Maintenance Testing Technical Specification Changes
ISAP Topic 1.34, Items 4.5.2 and 4.5.3, Reactor Trip System Testing
ISAP Topic 1.35, Item 4.5.1, Reactor System Functional Testing
ISAP Topic 1.43, Technical Specification for Anticipatory Trips
ISAP Topic 2.17, Reactor Protection Trip System

C. Evaluation

Generic Letter 83-28 requires licensees to:

- (1) Submit the results of their review of test and maintenance procedures and Technical Specifications to assure that post-maintenance operability testing and safety-related components in the reactor trip system is required to be conducted and that the testing demonstrates that the equipment is capable of performing its safety functions before being returned to service; and
- (2) Submit the results of their check of vendor and engineering recommendations to ensure that any appropriate test guidance is included in the test and maintenance procedures or the Technical Specifications, where required.

A review of Millstone Unit No. 1 test and maintenance procedures and Technical Specifications indicated that post-maintenance operability testing is required in all cases. All known applicable vendor and engineering recommendations regarding testing have been included in test and maintenance procedures. No recommendations were applicable to the Technical Specifications.

D. Conclusions

The Millstone Unit No. 1 response (Reference (3)) to Generic Letter 83-28 is complete. At this time, there are no outstanding NRC

requests for additional information. The results of the NRC's evaluation of the Millstone Unit No. 1 response have not yet been received.

E. References

1. Section 2.3.4 of NUREG-1000.
2. Generic Letter 83-28, dated July 8, 1983.
3. W. G. Counsil letter to D. G. Eisenhut, dated November 8, 1983.

IV. ISAP Topic 1.28, Post-Maintenance Testing Technical Specification Changes

A. Review Criteria

1. Topic 1.28 corresponds to Position 3.1, "Post-Maintenance Testing (Reactor Trip System Components)," part 3.1.3 of Generic Letter 83-28.

B. Related Topics/Interfaces

ISAP Topic 1.18, ATWS
ISAP Topic 1.26, Equipment Classification/Vendor Interface
ISAP Topic 1.27, Post-Maintenance Testing Procedures
ISAP Topic 1.30, Post-Trip Review Data and Information
ISAP Topic 1.31, Equipment Classification/Vendor Interface
ISAP Topic 1.32, Items 3.2.1 and 3.2.2, Post-Maintenance Testing Procedures
ISAP Topic 1.33, Item 3.2.3, Post-Maintenance Testing Technical Specification Changes
ISAP Topic 1.34, Items 4.5.2 and 4.5.3, Reactor Trip System Testing
ISAP Topic 1.35, Item 4.5.1, Reactor System Functional Testing
ISAP Topic 1.43, Technical Specification for Anticipatory Trips
ISAP Topic 2.17, Reactor Protection Trip System

C. Evaluation

Generic Letter 83-28 requires licensees to:

- (1) Identify, if applicable, any post-maintenance test requirements in existing Technical Specifications which can be demonstrated to degrade rather than enhance safety. Appropriate changes to these test requirements, with supporting justification, shall be submitted for staff approval.

No situations were identified wherein existing Millstone Unit No. 1 Technical Specification requirements will result in degraded safety. The required tests and test frequencies are adequate to ensure component operability while not degrading component performance.

D. Conclusions

The Millstone Unit No. 1 response (Reference (3)) to Generic Letter 83-28 is complete. At this time, there are no outstanding NRC requests for additional information. The results of the NRC's evaluation of the Millstone Unit No. 1 response have not yet been received.

E. References

1. Section 2.3.4 of NUREG-1000.
2. Generic Letter 83-28, dated July 8, 1983.
3. W. G. Counsil letter to D. G. Eisenhower, dated November 8, 1983.

V. ISAP Topic 1.30, Post-Trip Review Data and Information

A. Review Criteria

1. Topic 1.30 corresponds to Position 1.2, "Post-Trip Review - Data and Information Capability," of Generic Letter 83-28.

B. Related Topics/Interfaces

ISAP Topic 1.18, ATWS
ISAP Topic 1.26, Equipment Classification/Vendor Interface
ISAP Topic 1.27, Post-Maintenance Testing Procedures
ISAP Topic 1.28, Post-Maintenance Testing Technical Specification Changes
ISAP Topic 1.31, Equipment Classification/Vendor Interface
ISAP Topic 1.32, Items 3.2.1 and 3.2.2, Post-Maintenance Testing Procedures
ISAP Topic 1.33, Item 3.2.3, Post-Maintenance Testing Technical Specification Changes
ISAP Topic 1.34, Items 4.5.2 and 4.5.3, Reactor Trip System Testing
ISAP Topic 1.35, Item 4.5.1, Reactor System Functional Testing
ISAP Topic 1.43, Technical Specification for Anticipatory Trips
ISAP Topic 2.17, Reactor Protection Trip System

C. Evaluation

Generic Letter 83-28 requires licensees to prepare a report which describes and justifies the adequacy of equipment for diagnosing an unscheduled reactor shutdown. The report shall describe as a minimum:

- (1) the capability for assessing sequence of events (on-off indications)
- (2) the capability for assessing to determine the cause of functioning of safety-related equipment
- (3) other data and information provided to assess the cause of unscheduled reactor shutdowns.

- (4) the scheduled for any planned changes to existing data and information capability.

The capability for monitoring sequence of events is provided by the plant process computer in combination with a separate dedicated sequence of events recorder. The plant process computer provides valuable output with respect to the capability for assessing the time history of analog variables needed to determine the cause of unscheduled reactor shutdowns and the functioning of safety-related equipment. In addition to the process computer and sequence of events recorder, information to assess the cause of unscheduled reactor shutdowns is available from strip chart recorders on various panels in the control room.

The plant process computer is currently scheduled for replacement in 1988. At that time the sequence of events recorder will be incorporated into the process computer system.

D. Conclusions

The Millstone Unit No. 1 response (Reference (3)) to Generic Letter 83-28 is complete. At this time, there are no outstanding NRC requests for additional information. The NRC's review of the Millstone Unit No. 1 response have not yet been received.

E. References

1. Section 2.2 of NUREG-1000.
2. Generic Letter 83-28, dated July 8, 1983.
3. W. G. Counsil letter to D. G. Eisenhut, dated November 8, 1983.

VI. ISAP Topic 1.31, Equipment Classification/Vendor Interface

A. Review Criteria

1. Topic 1.31 corresponds to Position 2.2, "Equipment Classification and Vendor Interface (Programs of All Safety-Related Components)," of Generic Letter 83-28.

B. Related Topics/Interfaces

ISAP Topic 1.18, ATWS
ISAP Topic 1.26, Equipment Classification/Vendor Interface
ISAP Topic 1.27, Post-Maintenance Testing Procedures
ISAP Topic 1.28, Post-Maintenance Testing Technical Specification Changes
ISAP Topic 1.30, Post-Trip Review Data and Information
ISAP Topic 1.32, Items 3.2.1 and 3.2.2, Post-Maintenance Testing Procedures
ISAP Topic 1.33, Item 3.2.3, Post-Maintenance Testing Technical Specification Changes
ISAP Topic 1.34, Items 4.5.2 and 4.5.3, Reactor Trip System Testing
ISAP Topic 1.35, Item 4.5.1, Reactor System Functional Testing
ISAP Topic 1.43, Technical Specification for Anticipatory Trips
ISAP Topic 2.17, Reactor Protection Trip System

C. Evaluation

Generic Letter 83-28 requires licensees to:

- (1) Describe their program for ensuring that all components of safety-related systems necessary for accomplishing required safety functions are identified as safety-related on documents, procedures and information handling systems used in the plant to control safety-related activities, including maintenance, work orders and replacement parts; and
- (2) Establish, implement and maintain a continuing program to ensure that vendor information is complete, current and controlled throughout the life of the plant, and appropriately referenced or incorporated in plant instructions and procedures.

Millstone Unit No. 1 has established criteria to identify the systems, structures and components which are safety-related. The information handling system used to identify these safety-related components is the Category 1 MEPL. The MEPL is currently in document form. The information contained in the MEPL will be identified on the computer, as part of the PMMS, which will eventually replace the MEPL.

Millstone Unit No. 1 considers the VETIP, as defined in the March 1984 NUTAC report to be a valid response to the requirements of Position 2.2, part 2.2.2. The program, as described in the NUTAC report has been implemented to the extent practical.

D. Conclusions

The Millstone Unit No. 1 response (References 4 and 6) to Generic Letter 83-28 is complete.

At this time, there are no outstanding NRC requests for additional information. The results of the NRC's evaluation of the Millstone Unit No. 1 response have not yet been received.

E. References

1. Section 2.3.1 of NUREG-1000.
2. Section 2.3.2 of NUREG-1000.
3. Generic Letter 83-28, dated July 8, 1983.
4. W. G. Counsil letter to D. G. Eisenhut, dated November 8, 1983.
5. J. A. Zwolinski letter to W. G. Counsil, dated March 5, 1985.
6. J. F. Opeka letter to J. R. Miller, dated May 9, 1985.

VII. ISAP Topic 1.32, Post-Maintenance Testing Procedures

A. Review Criteria

1. Topic 1.32 corresponds to Position 3.2, "Post-Maintenance Testing (All Other Safety-Related Components)," parts 3.2.1 and 3.2.2 of Generic Letter 83-28.

B. Related Topics/Interfaces

ISAP Topic 1.18, ATWS
ISAP Topic 1.26, Equipment Classification/Vendor Interface
ISAP Topic 1.27, Post-Maintenance Testing Procedure
ISAP Topic 1.28, Post-Maintenance Testing Technical Specification Changes
ISAP Topic 1.30, Post-Trip Review Data and Information
ISAP Topic 1.31, Equipment Classification/Vendor Interface
ISAP Topic 1.33, Item 3.2.3, Post-Maintenance Testing Technical Specification Changes
ISAP Topic 1.34, Items 4.5.2 and 4.5.3, Reactor Trip System Testing
ISAP Topic 1.35, Item 4.5.1, Reactor System Functional Testing
ISAP Topic 1.43, Technical Specification for Anticipatory Trips
ISAP Topic 2.17, Reactor Protection Trip System

C. Evaluation

Generic Letter 83-28 requires licensees to:

- (1) Submit the results of their review of test and maintenance procedures and Technical Specifications to assure that post-maintenance operability testing of safety-related components in the reactor trip system is required to be conducted and that the testing demonstrates that the equipment is capable of performing its safety functions before being returned to service; and
- (2) Submit the results of their check of vendor and engineering recommendations to ensure that any appropriate test guidance is included in the test and maintenance procedures or the Technical Specifications, where required.

A review of Millstone Unit No. 1 test and maintenance procedures and Technical Specifications indicated that post-maintenance operability testing is required in all cases. All known applicable vendor and engineering recommendations regarding testing have been included in test and maintenance procedures. No recommendations were applicable to the Technical Specifications.

D. Conclusions

The Millstone Unit No. 1 response (Reference (3)) to Generic Letter 83-28 is complete. At this time, there are no outstanding NRC

requests for additional information. The results of the NRC's evaluation of the Millstone Unit No. 1 response have not yet been received.

E. References

1. Section 2.3.4 of NUREG-1000.
2. Generic Letter 83-28, dated July 8, 1983.
3. W. G. Council letter to D. G. Eisenhower, dated November 8, 1983.

VIII. ISAP Topic 1.33, Post-Maintenance Testing Technical Specification Changes

A. Review Criteria

1. Topic 1.33 corresponds to Position 3.2, "Post-Maintenance Testing (All Other Safety-Related Components)," parts 3.2.3 of Generic Letter 83-28.

B. Related Topics/Interfaces

ISAP Topic 1.18, ATWS
ISAP Topic 1.26, Equipment Classification/Vendor Interface
ISAP Topic 1.27, Post-Maintenance Testing Procedures
ISAP Topic 1.28, Post-Maintenance Testing Technical Specification Changes
ISAP Topic 1.30, Post-Trip Review Data and Information
ISAP Topic 1.31, Equipment Classification/Vendor Interface
ISAP Topic 1.32, Items 3.2.1 and 3.2.2, Post-Maintenance Testing Procedures
ISAP Topic 1.34, Items 4.5.2 and 4.5.3, Reactor Trip System Testing
ISAP Topic 1.35, Item 4.5.1, Reactor System Functional Testing
ISAP Topic 1.43, Technical Specification for Anticipatory Trips
ISAP Topic 2.17, Reactor Protection Trip System

C. Evaluation

Generic Letter 83-28 requires licensees to:

- (1) Identify, if applicable, any post-maintenance test requirements in existing Technical Specifications which can be demonstrated to degrade rather than enhance safety. Appropriate changes to these test requirements, with supporting justification, shall be submitted for staff approval.

No situations were identified wherein existing Millstone Unit No. 1 Technical Specification requirements will result in degraded safety. The required tests and test frequencies are appropriate to ensure component operability while not degrading component performance.

D. Conclusions

The Millstone Unit No. 1 response (Reference (3)) to Generic Letter 83-28 is complete. At this time, there are no outstanding NRC requests for additional information. The results of the NRC's evaluation of the Millstone Unit No. 1 response have not yet been received.

E. References

1. Section 2.3.4 of NUREG-1000.
2. Generic Letter 83-28, dated July 8, 1983.
3. W. G. Counsil letter to D. G. Eisenhut, dated November 8, 1983.

IX. ISAP Topic 1.34, Reactor Trip System Testing

A. Review Criteria

1. Topic 1.34 corresponds to Position 4.5, "Reactor Trip System Reliability (System Functional Testing)," parts 4.5.2 and 4.5.3 of Generic Letter 83-28.

B. Related Topics/Interfaces

ISAP Topic 1.18 - ATWS
ISAP Topic 1.26, Equipment Classification/Vendor Interface
ISAP Topic 1.27, Post-Maintenance Testing Procedures
ISAP Topic 1.28, Post-Maintenance Testing Technical Specification Changes
ISAP Topic 1.30, Post-Trip Review Data and Information
ISAP Topic 1.31, Equipment Classification/Vendor Interface
ISAP Topic 1.32, Items 3.2.1 and 3.2.2, Post-Maintenance Testing Procedures
ISAP Topic 1.33, Item 3.2.3, Post-Maintenance Testing Technical Specification Changes
ISAP Topic 1.35, Item 4.5.1, Reactor System Functional Testing
ISAP Topic 1.43, Technical Specification for Anticipatory Trips
ISAP Topic 2.17, Reactor Protection Trip System

C. Evaluation

Generic Letter 83-28 requires licensees to:

- (1) Justify not making modifications to permit on-line testing, if the plant is not currently designed to permit such testing; and
- (2) Review existing intervals for on-line functional testing required by Technical Specifications to determine that the intervals are consistent with achieving high reactor trip system availability when accounting for considerations such as:

1. uncertainties in component failure rates
2. uncertainty in common mode failure rates
3. reduced redundancy during testing
4. operator errors during testing
5. component "wear out" caused by the testing

Since on-line testing is performed at Millstone Unit No. 1, Position 4.5, part 4.5.2 is not applicable. Millstone Unit No. 1 intends to endorse the BWR Owners Group response to part 4.5.3 of Position 4.5.

D. Conclusions

Since the NRC only recently received the BWR Owners Group response to part 4.5.3 of Position 4.5, a plant-specific response for Millstone Unit No. 1 will be provided subsequent to the NRC's review of the Owners Group response.

At this time, there are no outstanding NRC requests for additional information.

E. References

1. Section 3 of NUREG-1000.
2. Generic Letter 83-28, dated July 8, 1983.
3. W. G. Counsil letter to D. G. Eisenhut, dated November 8, 1983.
4. W. G. Counsil letter to D. G. Eisenhut, dated March 16, 1984.
5. J. A. Zwolinski letter to W. G. Counsil, dated March 5, 1985.
6. J. F. Opeka letter to J. R. Miller, dated May 9, 1985.

X. ISAP Topic 1.35, Reactor System Functional Testing

A. Review Criteria

1. Topic 1.36 corresponds to Position 4.5, "Reactor Trip System Reliability (System Functional Testing)," part 4.5.1 of Generic Letter 83-28.

B. Related Topics/Interfaces

ISAP Topic 1.18, ATWS
ISAP Topic 1.26, Equipment Classification/Vendor Interface
ISAP Topic 1.27, Post-Maintenance Testing Procedures
ISAP Topic 1.28, Post-Maintenance Testing Technical Specification Changes
ISAP Topic 1.30, Post-Trip Review Data and Information
ISAP Topic 1.31, Equipment Classification/Vendor Interface
ISAP Topic 1.32, Items 3.2.1 and 3.2.2, Post-Maintenance Testing Procedures
ISAP Topic 1.33, Item 3.2.3, Post-Maintenance Testing Technical Specification Changes
ISAP Topic 1.34, Items 4.5.2 and 4.5.3, Reactor Trip System Testing
ISAP Topic 1.43, Technical Specification for Anticipatory Trips

ISAP Topic 2.17, Reactor Protection Trip System

C. Evaluation

Generic Letter 83-28 requires licensees to:

- (1) Perform on-line functional testing of the reactor trip system including independent testing of the diverse trip features, i.e., the scram pilot valves and back-up valves, including initiating circuitry.

On-line functional testing of the Millstone Unit No. 1 reactor trip system is performed at the frequencies defined by the Technical Specifications. Operability of the scram pilot valves and initiating circuitry is demonstrated. A procedure to fully test the normal and ATWS back-up scram valves is being implemented, in response to Generic Letter 83-28.

D. Conclusions

The Millstone Unit No. 1 response (Reference (3)) to Generic Letter 83-28 is complete. At this time, there are no outstanding NRC requests for additional information. The results of the NRC's evaluation of the Millstone Unit No. 1 response have not yet been received.

E. References

1. Section 3 of NUREG-1000.
2. Generic Letter 83-28, dated July 8, 1983.
3. W. G. Council letter to D. G. Eisenhower, dated November 8, 1983.
4. W. G. Council letter to D. G. Eisenhower, dated March 16, 1984.