



# LONG ISLAND LIGHTING COMPANY

SHOREHAM NUCLEAR POWER STATION

P.O. BOX 618, NORTH COUNTRY ROAD • WADING RIVER, N.Y. 11792

WILLIAM E. STEIGER, JR.

ASSISTANT VICE PRESIDENT—NUCLEAR OPERATIONS

SNRC-1692

MAR 13 1990

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

LILCO's Request for Interim Relief Pending Disposition of its  
Request for an Exemption from the Leak Rate Testing Requirements  
of 10 CFR 50.54(o) and Appendix J, III.D.1 through III.D.3  
Shoreham Nuclear Power Station - Unit 1  
Docket No. 50-322

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Ref: (1) Hunton & Williams letter dated December 8, 1989 to U.S.  
Nuclear Regulatory Commission from David S. Harlow, One  
of Counsel for Long Island Lighting Company; subject:  
Request for an Exemption from the Primary Containment  
Leak Rate Testing Requirements of 10CFR50.54(o) and  
Appendix J, III.D.1 through III.D.3

Gentlemen:

By this letter Long Island Lighting Company (LILCO or the  
Company) requests interim relief from the requirements under 10  
CFR 50.54(o) and Appendix J, III.D.1 through III.D.3 that it  
perform primary containment leak rate testing, pending the  
Staff's disposition of LILCO's December 8, 1989 request for an  
exemption from those requirements (Ref. 1). As LILCO pointed out  
in its exemption request, under the regulations LILCO must  
perform burdensome and costly testing of the primary containment,  
even though, with Shoreham's fuel having been removed from the  
reactor vessel and placed in the spent fuel pool, there is no  
health and safety need to maintain primary containment integrity.

Interim relief pending Staff approval of LILCO's exemption  
request will allow the Company to suspend performing further leak  
rate testing as such tests become due, with corresponding cost  
savings. As was noted in LILCO's December 8 exemption request,  
it costs approximately \$ 138,000 to perform a Type A integrated  
leak rate test and approximately \$ 445,000 to conduct the Type B  
and C local leak rate tests each 18-24 month cycle.

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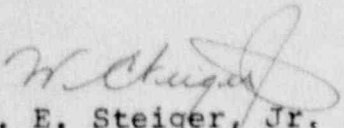
Interim relief should be granted on the following basis:

1. SNPS is in a non-operational, defueled condition with all fuel stored in the Spent Fuel Storage Pool.
2. Primary containment integrity is not required in a defueled condition. Thus, Appendix J testing which provides assurance of this safety function is not required.
3. In accordance with the Settlement Agreement between LILCO and the State of New York, LILCO is contractually prohibited from ever operating Shoreham.
4. As evaluated and submitted in LILCO letter SNRC-1664 dated January 5, 1990, design basis accidents for SNPS in a non-operational, defueled condition have been significantly reduced and are only associated with fuel handling and a liquid radwaste tank rupture.
5. As postulated and analyzed, a worst case radiological event, in which the entire gaseous activity of the whole core is released to the reactor building, indicates that integrated doses would be very small fractions of the 10CFR100 limits.

As has been noted in the exemption request, LILCO will perform the necessary leak rate testing, and will reestablish primary containment integrity as required under Shoreham's technical specifications, prior to returning to any applicable operational condition. Meanwhile, even without periodic testing, under LILCO's systems lay-up program the primary containment will be protected from irreparable degradation. In fact, Appendix J testing has the potential actually to conflict with implementation of LILCO's lay-up program, since the lay-up program includes the drying out of certain systems, while Appendix J testing must be conducted when water is present in many of these same systems.

Should you have any questions or need additional clarification, please do not hesitate to contact this office.

Very truly yours,

  
W. E. Steiger, Jr.  
Assistant Vice President  
Nuclear Operations

MAP/ap

cc: S. Brown  
T. T. Martin  
L. Doerflein