

JUL 24 1985

Docket No. 50-322

License No. NPF-19

Long Island Lighting Company  
ATTN: Mr. John D. Leonard, Jr.  
Vice President - Nuclear  
P. O. Box 618  
Shoreham Nuclear Power Station  
Wading River, New York 11792

Gentlemen:

Subject: Inspection Report No. 50-322/85-12

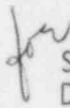
This refers to your letter dated June 6, 1985, in response to our letter dated May 7, 1985.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:  
Lee H. Bettenhausen

 Stewart D. Ebnetter, Director  
Division of Reactor Safety

cc w/encl:

W. Steiger, Plant Manager  
J. Smith, Manager, Nuclear Operations Support  
R. Kubinak, Director, QA, Safety and Compliance  
E. Youngling, Manager, Nuclear Engineering  
Edward M. Barrett, Esquire  
Jeffrey L. Futter, Esquire  
J. Notaro, Manager, QA Department  
Shoreham Hearing Service List  
Public Document Room (PDR)  
Local Public Document Room (LPDR)  
Nuclear Safety Information Center (NSIC)  
NRC Resident Inspector  
State of New York

OFFICIAL RECORD COPY

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bcc w/encl:  
Region I Docket Room (with concurrences)  
Senior Operations Officer (w/o encl)  
Director, DRSS  
Director, DRS  
DRP Section Chief  
B. Bordenick, ELD  
R. Goddard, ELD

*MB*  
RI:DRS  
Blumberg/djh  
7/19/85

RI:DRS  
Johnson  
*ju*  
7/19/85

*MB*  
RI:DRS  
Bettenhausen  
7/21/85



# 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 6, 1985

SNRC-1182

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

Corrective & Preventive Maintenance Program  
Inspection 85-12  
Shoreham Nuclear Power Station - Unit 1  
Docket No. 50-322

Reference: Letter from NRC (Stewart D. Ebnetter) to Lilco  
(J. D. Leonard) dated 5-7-85 including Appendix A,  
Notice of Violation, and NRC Inspection Report  
50-322/85-12

Dear Dr. Murley:

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

Should you have any questions, please contact this office.

Very truly yours,

John D. Leonard  
Vice President-Nuclear Operations

DRH/cf

Attachment

cc: P. Eselgroth

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APPENDIX A  
NOTICE OF VIOLATION

Shoreham Technical Specification, Paragraph 6.8.1 requires that:

"Written procedures shall be established, implemented, and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February, 1978...."

Shoreham general administrative procedure, SP no. 12.015.01 Rev. 7, dated February 6, 1985, "Preventive Maintenance Program," paragraph 8.3.1, requires that preventive maintenance activities be performed in accordance with approved procedures when required by the Scheduled Activity Work Sheet (SAWS).

Paragraph 8.4.1 of the same procedure allows deferral of preventive maintenance activities; however, the "new date may not exceed the next normally scheduled due date."

Contrary to the above, February 22, 1985, the inspector identified numerous (approximately 50) safety-related preventive maintenance I&C activities that had not been performed according to the SAWS and had exceeded the next normally scheduled due date.

These activities included:

- Control Room Temperature/Humidity Control-Loop Check Calibration
- 24 VDC Power Supply-Calibrate Power Supply
- RCIC Exhaust MOV-Perform and Record Cycle Time and Running Current
- Diesel Generator 101 Switchgear Relays-Inspect and if Necessary Clean

1. Corrective Steps Which Have Been Taken And The Results Achieved

At the time of the inspection, only one set of Preventive Maintenance (PM) activities had exceeded their next normally scheduled due date (Diesel Generator Switchgear Relays). This PM is discussed below. The other activities had exceeded their extension dates, but had not exceeded their next normally scheduled due dates. Paragraph 8.4.1 of SP12.015.01 states that a PM activity may be deferred by a section head as long as the new date does not exceed the next normally scheduled date. At the time of the inspection, the I&C Section Head was purposely not deferring activities in

order to highlight the PMs which were overdue. Thus the discrepancy was that the PM activities had not been deferred by the Section head when the activities exceeded their extension date. It is acknowledged that having this number of PM activities delayed is the primary concern which must be addressed.

The diesel engine relay item delineated in the violation is discussed below.

#### Diesel Generator 101 Switchgear Relays-Inspect and Clean

There are two PM activities on each TDI Diesel Generator for this item. These PMs were initiated to meet commitments LILCO made in an ASLB settlement (May, 1982). The commitments stated that LILCO would inspect the Diesel Generator control panels prior to fuel load to assure each is clean and dust free, and then again following fuel load after the first required technical specification monthly test of the Diesel Generators. The initial inspection was performed in August 1984. The followup inspection has not been performed since the technical specifications presently in effect do not require testing of the TDI Diesel Generators. The PM schedule was written assuming a normal startup schedule which would have required a monthly test of the Diesel Generators following the commencement of fuel load. The PM frequency was not changed when the startup schedule was changed. So even though technically these PM activities had not been completed by their next normally scheduled due date, the actual reason for creating the PM activity has not been missed or neglected. The performance of these activities are now being scheduled consistent with the overall schedule to demonstrate the operability of the TDI Diesel Generators.

#### 2. Corrective Action Which Will Be Taken to Avoid Further Violations

Additional I&C technician positions have recently been allotted to the I&C section to reduce the PM backlog. It is anticipated that these positions will be filled and trained by December 1, 1985. With the addition of these technicians, the backlog of the I&C PMs should be eliminated.

Furthermore, the SP12.015.01 procedure will be revised to stipulate that safety related PM activities will not be permitted to exceed their extension dates unless deferred by the I&C Section Head or his designee. This will prevent the slippage of items past their extension dates as witnessed by the NRC inspectors during this inspection. This procedure revision will be completed by June 30, 1985.

3. The Date When Full Compliance Will Be Achieved.

As stated above, the procedure changes will be completed by June 30, 1985. Upon approval of the procedure change, all priority 1 PM activities that have exceeded their extension dates will either be completed by July 30 or deferred by the section head in accordance with SP12.015.01.