

## 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

MAR 1 8 1986

SNRC-1239

Mr. Harold R. Denton, Director Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washington, DC 20355

> Additional Information In Support Of License Change Request No. 2 Shoreham Nuclear Power Station Docket No. 50-322

Reference:

LILCO letter (J. D. Leonard, Jr.) SNRC-1211, dated November 16, 1985 to NRC (H. R. Denton)

Dear Mr. Denton:

The purpose of this letter is to document the information provided in response to several questions that your Mr. Ralph Caruso asked our Mr. Gary Gisonda during telephone conversations concerning LILCO's request to change the footnote on page 3/4 4-9 of the Shoreham Technical Specifications.

The first request was to document a description of the primary containment (drywell) air coolers condensate flow indication system. A discussion of this equipment is found in SNPS FSAR Sections 5.2.7.1.2.2 and 7.7.1.14.2. The component that enables control room operators to sense conditions indicative of high drywell humidity is the flow switch 1T47-FS029A (or B) located in the fan cooler condensate drain line on elevation 63 feet in the drywell. SNPS FSAR Figure 9.4.6-1, "Flow Diagram Sys. 1T47 Primary Containment Air Cooling System", shows the location of these flow switches. Flow rates in excess of 1.3 gpm will cause this switch to complete a circuit that causes an alarm to annunciate in the control room.

The second request was to provide an explanation of the test conducted to satisfy the channel functional test requirement of Technical Specification 4.4.3.1.c. Station Procedure 44.403.10, entitled "Drywell Cooler Drain Flow Rate Functional Test", is attached to fulfill this request.

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Third, you wanted to document why we need the change and any hardship that could result without NRC approval. This change is sought specifically to reduce personnel exposure to radiation during the power ascension test program (PATP). It is also sought to prevent possible interruptions in the power ascension test program. Section 6.2.4 of Supplement 9 to the Shoreham Safety Evaluation Report states that it is better to operate the reactor without inerting during the power ascension test program and LILCO intends to keep the containment in a non-inerted condition consistent with our forthcoming license condition. Per the present requirements of the SNPS Technical Specifications, the attached procedure would have to be implemented every thirty-one days during the PATP. This means a containment entry would be necessary and the work activity would take place in a high radiation area with the reactor at greater than 2% thermal power. In order to implement the procedure safely, the reactor power would have to be reduced to less than 2% thermal power and the result could be several interruptions in the power ascension test program.

Finally, it was suggested that we should inject a signal outside the containment into the circuitry to cause the annunciator to alarm in the control room. LILCO's position is that this would not comply with Shoreham's Technical Specifications since the channel to be functionally tested is a bistable channel. Per the definition contained in Section 1.6 of the Shoreham Technical Specifications, the injection of a signal into the sensor is required and in this case the flow switch is the sensor.

We believe that the information contained in this letter sufficiently resolves your concerns and has answered your questions. Should you need additional information please call my office.

Very truly yours,

J. D. Leonard, Jr. Vice President-Nuclear Operations

GJG:ck

Attachment

cc: J. A. Berry