

NOV 14 1989

In Reply Refer To:
Docket: 50-382/89-31
EA: 89-192

Louisiana Power & Light Company
ATTN: J. G. Dewease, Senior Vice President
Nuclear Operations
317 Baronne Street
New Orleans, Louisiana 70160

Gentlemen:

SUBJECT: NOTICE OF VIOLATION (NRC INSPECTION REPORT 50-382/89-31)

This refers to the inspection conducted by personnel of the NRC Region IV office during the period of September 21-29, 1989, of activities authorized by NRC Operating License NPF-38 for Waterford Steam Electric Station, Unit 3 (Waterford 3). The inspection included a review of the events which occurred on September 21, 1989, when Main Steam Line Code Safety Valve MS-106A was tested and was found to be inoperable because the lift setting pressure was less than that required by Technical Specification 3.7.1.1. As a result of this inspection, it was found that certain of your activities were in violation of NRC requirements. On October 10, 1989, NRC Inspection Report 50-382/89-31 was issued which provided the details of the inspection performed September 21-29, 1989. An enforcement conference was held with you and members of your staff in the NRC Region IV office on October 24, 1989, to discuss the issues related to these events.

Violation A in the enclosed Notice of Violation (NOV) involves an inoperable main steam line code safety valve, MS-106A. When this valve was tested on September 21, 1989, the test data taken at 12:41 p.m. resulted in a calculated lift setting pressure of 1030 psig, and was noted to be lower than required by Technical Specification (TS) 3.7.1.1 (1070 psig \pm 1 percent). Technical Specification 3.7.1.1 requires, in part, that with one main steam safety valve inoperable (outside of setpoint specification or otherwise), the valve shall be restored to operable or the linear power level-high trip setpoints shall be reduced to 86.8 percent within 4 hours. Neither of these actions was performed within 4 hours. Although the immediate safety significance was minimal because the safety valve was out of tolerance in a conservative direction, this violation is significant in that there appeared to be no proceduralized method in place to resolve suspect safety-related surveillance and test data within the time limits specified in the TS action statement. This is a violation of TS 3.7.1.1.a.

*RIV:DRP/A
ATHowell
11/ /89

*C:DRP/A
DDChamberlain
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*EO
GFSanborn
11/ /89

DRP
for SJC Collins
11/14/89

*previously concurred

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Violation B in the enclosed NOV involves a failure to provide an adequate procedure (MM-007-015) for the testing of main steam line code safety valves. This failure to provide an adequate procedure resulted in the Trevitest test unit remaining installed on MS-106A, with no testing in progress for approximately 2 hours even though it was not known during that time if the valve would have been able to relieve main steam pressure with the unit installed. Eight other weaknesses were noted with MM-007-015. One of these other weaknesses was that the procedure did not address the operability requirement or reference the TS for main steam line code safety valves to ensure that personnel performing the test would promptly inform the shift supervisor when the TS requirements were not being met. This weakness appeared to have contributed to the lack of timeliness in verifying the validity of the initial test data. This is a violation of TS 6.8.1.c, in that you failed to establish an adequate procedure pursuant to this requirement.

During the enforcement conference, your staff indicated that it planned to evaluate questionable safety-related surveillance and test data in accordance with your 24-hour operability determination procedure, "Nonconformance/Indeterminate Qualification Process," (NOP-19). We are concerned that reliance on this procedure to determine the operability status of safety-related equipment on the basis of an evaluation of surveillance or test data may still result in instances in which an operability determination is made after actions would already have been required by the Technical Specifications. Therefore, we urge you to thoroughly review this matter before implementing corrective actions in this area.

NRC appreciates the candor displayed by LP&L during the October 24 enforcement conference and the thoroughness of LP&L's preparations for this conference. We also anticipate that the corrective actions you outlined then, in addition to those you may undertake as a result of your continuing review of these issues, will result in enhancing the safe operation of the Waterford-3 plant. The remaining issues discussed at the enforcement conference involving the operation of danger-tagged valves will be addressed in separate correspondence.

You are required to respond to this violation, in writing, in accordance with the provision of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Your response should be made on the basis of the specifics contained in the Notice of Violation enclosed with this letter.

The response directed by this letter and the accompanying Notice is not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Sincerely,

Original Signed By:
Thomas P. Gwynn

Samuel J. Collins, Director
Division of Reactor Projects

Enclosure:
Notice of Violation

cc w/enclosure:
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Louisiana Power & Light Company

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bcc to Dk. (IE14)

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*w/756