U. S. NUCLEAR REGULATORY COMMISSION OFFICE OF INSPECTION AND ENFORCEMENT

REGION IV

Report No. 50-382/80-29 Docket No. 50-382 Category A2 Licensee: Louisiana Power and Light Company 142 Delaronde Street New Orleans, Louisiana 70174 Facility Name: Waterford Steam Electric Station, Unit 3 Meeting at: New Orleans, Louisiana (October 27, 1980) NRC Participants: C. Seidle, Chief, Reactor Construction and Engineering Support Branch A. Crossman, Chief, Projects Section ewart, Reactor Inspector, Projects Section Approved: ssman, Chief, Projects Section

Meeting Summary:

Meeting on October 27, 1980 (Report No. 50-382/80-29)

Meeting Topics: Announced meeting with Louisiana Power and Light Company corporate management concerning the evaluation of the licensee's performance.

DETAILS

1. Persons Contacted

Principal Licensee Employees

G. D. McClendon, Senior Vice President

D. L. Aswell, Vice President - Power Production

L. U. Maurin, Waterford 3 Project Director

T. F. Gerrets, QA Manager

L. L. Bass, Project QA Engineer

NRC Participants

K. V. Seyfrit, Director, Region IV

W. C. Seidle, Chief, Reactor Construction & Engineering Support Branch

W. A. Crossman, Chief, Projects Section

R. C. Stewart, Reactor Inspector, Projects Section

G. L. Constable, Senior Resident Inspector

2. Meeting with LP&L Management

a. Purpose of Meeting

The purpose of this meeting was to describe the regional evaluation for the systematic appraisal of licensee performance. This evaluation is an integral part of the Systematic Assessment of Licensee Performance (SALP) program which is to be implemented in accordance with the commitments of the "Action Plan for Implementing Recommendations of the President's Commission and Other Studies of TMI-2 Accident." The attached Appendix B is the performance evaluation for the Waterford, Unit 3 facility for the period September 1, 1979, through July 31, 1980, compiled by the NRC participants and a Regional Review Board.

To begin the meeting, the Regional Director outlined the following objectives for a systematic appraisal of licensee performance:

- Identify exceptional or unacceptable licensee performance
- Improve licensee performance
- Improve the IE inspection program
- Provide and achieve a means of regional consistency in evaluating licensee performance

b. Enforcement History

The enforcement history for the Waterford, Unit 3 facility was reviewed. The following noncompliances were issued during the period of September 1, 1979, through July 31, 1980, by NRC, Region IV IE inspectors:

- Failure to follow inspection procedures (T-8)
- Failure to follow contract procedures related to care and maintenance of containment penetration assemblies (T-B)
- Failure to control use of a calibrated tool within necessary limits (T-B)
- Failure to verify conformance with documented drawings (NISCO/Ebasco)
- Failure to follow procedures for the documentation of quality assurance program (NISCO)
- Failure to perform required inspections as prescribed in contract inspection procedures (NISCO)
- Failure to follow contract procedures relative to the storage of safety-related equipment (NISCO)
- Failure to follow procedures for control of design modifications (T-B)
- Failure to follow contract procedures relative to the care of safety-related piping (T-B)

Nine infractions issued during 945 man-hours of inspection in the following areas:

Mechanical Subcontractors

-	storage, care and maintenance	4
-	internal audit records	1
-	tool calibration	1
-	visual inspection	1
_	design changes	2

No deficiencies were identified during the evaluation period.

One deviation was issued during the period September 1, 1979, through July 31, 1980:

 Use of QC inspectors who did not meet ANSI N45.2.6 experience qualifications

c. Summary of Noncompliance Items

The NRC participants stated that the nine items of noncompliance issued during 945 man-hours of IE inspection effort is typical of an acceptable construction QA program. In addition, the nine infractions that were cited do not appear to be items of substantive concerns which indicates an effective positive trend in QA program implementation and management control by Louisiana Power and Light Company.

d. Construction Deficiency Reports (50.55(e))

- Reactor Containment Dome voids in concrete parapet wall
- Low Charpy Impact Test Results Feedwater RCB Penetration vendor supplied component
- Incompleted UT on Structural Steel Supports vendor supplied components
- Reactor Vessel Head Control Rod Guide Cones Loose vendor deficiency

The NRC participants stated that the licensee has demonstrated a conservative approach in reporting requirements and has submitted reports in a timely manner. In addition, the reporting threshold appears to be adequate.

e. Escalated Enforcement Actions

Immediate Action Letters

- August 20, 1979: Licensee Self Imposed Stop-Work Order on Reactor Containment Dome Concrete Placement
- May 9, 1980: Licensee Self Imposed Stop-Work Order on NSSS Installation Subcontractor - QA/QC Program Implementation Problems

The NRC participants stated that the licensee's self imposed stopwork orders reflect an effective and responsive management control. Corrective actions were effective and timely. f. Licensee's Responsiveness and Abi ity to Take Meaningful Corrective Action on Problems Identified by the IE Inspection Program

Responses to IE Bulletins/Circulars/Notices

The NRC participants stated that responses have been timely, concise and effective, indicating a meaningful management and engineering control system.

Responses to Enforcement Actions

The NRC participants stated that the licensee has demonstrated effective responsiveness and an ability to take meaningful action on problems identified by the IE inspection program and by their management control system.

g. Effectiveness and Attitudes of Personnel in Complying with NRC Regulatory Requirements

The NRC participants stated that LP&L has demonstrated awareness and a good responsive attitude towards complying with their commitments and NRC regulatory requirements.

3. Summary

The NRC Director emphasized the continuing need for adequate verification of employee qualifications, education and work history to assure the validity of personnel records. In addition, it was emphasized that there is continuing need for management awareness through the pending transitional phases from construction into preoperational testing and start up and that the licensee has principal and legal responsibility for all matters associated with the nuclear plant as specified in applicable regulations. Corporate management involvement is essential in all phases of the project to assure appropriate execution of the licensee's responsibilities.

Region IV

LICENSEE PERFORMANCE EVALUATION (CONSTRUCTION)

Facility: Waterford 3

Licensee: Louisiana Power and Light Company

Unit Identification:

Docket No.	CP No./Date of Issuance	Unit No.
50-382	CPPR-103/November 14, 1974	3

Reactor Information:	Unit 1	Unit 2	Unit 3
NSSS	Combustion Engineering	N/A	N/A
MWt	3410		

Appraisal Period: August 1, 1979 - July 31, 1980

Appraisal Completion Date: September 26, 1980

Review Board Members:

- W. C. Seidle, Chief, RC&ES Branch
- W. A. Crossman, Chief, Projects Section
- R. C. Stewart, Reactor Inspector, Projects Section
 D. P. Tomlinson, Reactor Inspector, Engineering Support Section
 J. I. Tapia, Reactor Inspector, Engineering Support Section
 *W. R. Kane, Project Manager, NRR

^{*} not in attendance

Number and Nature of Noncompliance Items

Noncompliance Category:	Unit 1	Unit 2	Unit 3
Violations	0	N/A	N/A
Infractions	9		
Deficiencies	0		
Areas of Noncompliance: (List Areas as Required)	Unit 1 (Points)	Unit 2 (Points)	Unit 3 (Points)
7 Items, Criterion V			
1 Item, Criterion X			
I Item, Criterion XII			
Total Points	90	N/A	N/A

Number and Nature of Deficiency Reports

- 1. RCB Dome Voids in Concrete Parapet Wall
- Low Charpy Impact Test Result Feedwater RCB Penetrations Vendor
- Incompleted UT on Structural Steel Supports Vendor Reactor Vessel Head Control Rod Guide Cones Loose Vendor

Escalated Enforcement Actions

Civil Penalties

None

Orders

None

Immediate Action Letters

- 1. August 20, 1979: Self Imposed Stop-Work Order on RCB Dome Concrete Placement.
- 2. May 9, 1980: Self Imposed Stop-Work Order NSSS Installation Subcontractor -QA/QC Program Implementation Problems

D. Management Conferences Held During Past Twelve Months
None

E. <u>Justification of Evaluations of Functional Areas Categorized as Requiring an Increase in Inspection Frequency/Scope (see evaluation sneet)</u>

None

Inspection

		Frequency and/or Scope		
-0	FUNCTIONAL AREA	INCREASE	NO. CHANGE	DECREASE
1.	Quality Assurance, Management & Training		1 X	
2.	Substructure & Foundations			x1/
3.	Concrete			x1/
4.	Liner (Containment & Others)			x1/
5.	Safety-Related Components		X	
6.	Piping & Hangers (Reactor Coolant & Others)		×	
7.	Safety-Related Components (Vessel, Internals & HVAC)		X	
8.	Electrical Equipment	HOME SAN	X	1
9.	Electrical (Tray & Wire)		X	
10.	Instrumentation		X	
11.	Fire Protection		X	
12.	Preservice Inspection		X	
13.	Reporting		X	
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^{1/}Construction is essentially complete.