



LOUISIANA
POWER & LIGHT

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November 28, 1980

D. L. ASWELL
Vice President-Power Production

W3P80-0267
Q-3-A35.02.01

Mr. K. V. Seyfrit, Director, Region IV
U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012

SUBJECT: Waterford SES Unit No. 3
USNRC Inspection Report 50-382/RPT 80-26

Dear Mr. Seyfrit:

The following information regarding the infraction cited by the USNRC Inspectors in IE Inspection Report No. 50-382/Rpt. 80-26 dated October 31, 1980, is herewith submitted.

Failure to Follow Procedures Relative to the Installation of Safety Related Tubing Assemblies

Criterion V of Appendix B to 10 CFR 50 requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances, and shall be accomplished in accordance with these instructions, procedures, or drawings.

The Mercury Company Procedure SP-656, "Fabrication of Local Instrument Piping and Tubing Assemblies", Revision 3, dated November 15, 1978, paragraph 6.3.7 states, "Plug all open ended valves with plastic caps or equal."

Contrary to the above:

On October 9, 1980, during the IE inspector's tracking of instrument sensor tubing runs, the IE inspector observed six installed 1/2 inch needle valves that were open and unprotected. Two of these valves were identified as safety-related valves (Item 3 on Mercury Company Drawing 151-T-014-C, Rev. 0) at the 46 foot elevation in the Reactor Containment Building.

This is an infraction.

8101100-752

The following response is submitted:

1. Corrective Action Taken and the Results Achieved:

Mercury QA advised Supervision of the situation and the lines in question were blown out with air and the valves capped off. Mercury QC witnessed this and has documented it on their Form 211, Inspection Report. (See attached.)

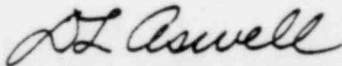
2. Corrective Action Taken to Preclude Repetition:

- a) A complete review was performed by Mercury Q.C. in all areas to assure that this condition did not exist elsewhere and the review proved that this was an isolated incident.
- b) In their Monday morning Training session (10/13/80), Mercury re-instructed Craft Personnel and Supervision to comply with the requirements of Mercury Procedure SP-656 Rev. 3. This has been documented on Form 266, Record of Training and Indoctrination. (See attached.)
- c) With their ongoing surveillance in all areas, Mercury feels this problem should be alleviated.

3. Date When Full Corrective Action Will Be Achieved:

Not applicable; action complete (see Item 2 above).

Yours very truly,



D. L. Aswell

DLA/LLB/pr

- cc: 1) Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555
- 2) Director, Office of Management
Information and Program Control
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

QUALITY CONTROL REPORT

JOB NO: N49720
CUST. ORD. NO: W3-NY-15
JOB NAME: WATERFORD
S.E.S. UNIT # 3

INSTRUCTIONS:

1. MOC to prepare this report for miscellaneous inspection, tests, and reports.
2. Record applicable references and requirements.
3. _____ to prepare this report.

DISTRIBUTION:

Original to:

☒ MOA

☐ MOC Proj. Folder

Copies to:

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☐ Customer

☐ _____

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☐ _____

SUBJECT: Cleaning out of S/S Lines

REFERENCE: OCR 648 - 151-T-014C

OCR 530 - 151-T-012C

S.U.S. # 66

On October 30, 1980 MOC witnessed, construction personnel as they blew out the tubing lines listed below, due to the fact that six $\frac{1}{4}$ " needle valves were installed in these lines, but, were left opened and unprotected.

LT-FW-1113B HP FT-MS-1011 HP

LT-FW-1113B LP FT-MS-1011 LP

FT-MS-0300AS HP

FT-MS-0300AS LP

No dirt or debris was found to be in the tubing or valves. Then all open ends were capped off with tape.

MOC REVIEW *[Signature]*

Mark Simmons
BY Mark Simmons

MOC 10-30-80

DATE

Date 10-13-80

A Subsidiary of
Fischbach and Moore, Inc.

EMPLOYEES RECEIVING INSTRUCTION:

NAME	TITLE	NAME	TITLE
See Attached	List		

DISTRIBUTION:

Original to: ☒ QA File
Copies to:
☐ Shop/Field Supt.
☐ _____

DEPARTMENT:

- ☐ QA/QC
☐ Engineering
☐ Contract Administration
☐ Purchasing
☐ Shop Production
☒ Field Construction

REFERENCES:

- QA Manual Sections 7 & 8
- Oper. Procedures MCP-2100
MCP-2140
- Welding Procedures N/A
- QC Procedures QCP-3110.4 SP 657, SP 660, SP 656

The Employee(s) listed above have completed reading assignments as applicable and have received 1/2 hr. hours of instruction to the above referenced documents and have demonstrated a satisfactory understanding of their duties and responsibilities and their role in the QA Program.

DISCUSSION: Ken Gilkerson OAE, K. Quinn MQC & D. Eldridge, Field Superintendent conducted a training session with all Mercury craft personnel.

The use of proper etching & scribing tools were emphasized with a review of how to mark scribe lines on tubing & pipe and what to do if scribe lines cannot be physically applied. (Visual verification by MQC). The installation of valves & tubing were also discussed emphasizing the capping or taping of all open ends & the flushing of lines where this has not been done. The placement of 2D & 3D clamps per the drawing was discussed along with maintaining proper slope. Work packages and their applicable dwgs, FCR's and DCN's were discussed with respect to the crafts access to typical books assigned to work areas.

MQC REVIEW *[Signature]*

Signed W. O. Gilkerson/OAE

Date 10-13-80

Dept. Manager or Instructor