

DEC 22 1989

In Reply Refer To:
Docket: 50-382/89-17

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

Gentlemen:

Thank you for your letters of August 17 and November 22, 1989, in response to our letters and Notice of Violation dated July 18, 1989. We have reviewed your supplemental response and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,
Original Signed By
T. F. Westerman

Samuel J. Collins, Director
Division of Reactor Projects

cc:
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<i>see in</i>	<i>see</i>	<i>A</i>
RIV:DRP/D	C:DRP/D	D/DRP
ATHowell/nc	DDChamberlain	SJCollins
12/21/89	12/21/89	12/22/89

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Louisiana Power & Light Company

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bcc to DMB (IE01)

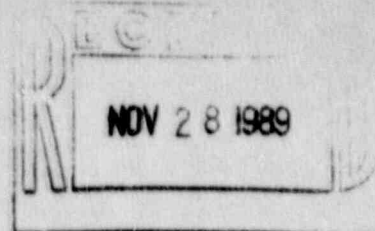
bcc distrib. by RIV:

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November 22, 1989

U.S. Nuclear Regulatory Commission
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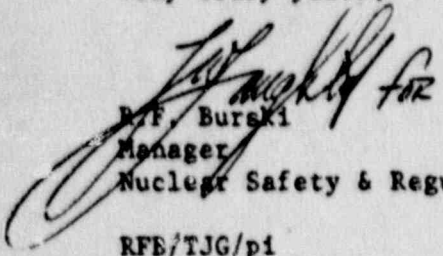
Subject: Waterford 3 SES
Docket No. 50-382
License No. NPF-38
NRC Inspection Report 89-17, Supplemental Response

Gentlemen:

Louisiana Power & Light (LP&L) hereby submits in Attachment 1 the supplemental information requested in your letter of October 23, 1989 with regard to two of the Violations (8917-03 and 8917-06) cited in the subject Inspection Report. LP&L previously responded to the Violations on August 17, 1989 in LP&L Letter No. W3P89-1508.

If you have any questions concerning this information, please contact T.J. Gaudet at (504) 464-3438.

Very truly yours,


R.F. Burski
Manager
Nuclear Safety & Regulatory Affairs

RFB/TJG/pi

cc: Messrs: R.D. Martin, NRC Region IV
F.J. Hebdon, NRC-NRR
D.L. Wigginton, NRC-NRR
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E.L. Blake
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ATTACHMENT 1

SUPPLEMENTAL INFORMATION FOR VIOLATIONS 8917-03 AND 8917-06

VIOLATION NO. 8917-03

NRC REQUEST

In Violation 382/8917-03, Example 1, UNT-005-003 was revised to make it clear that when vent or drain paths are required to be danger tagged, only the valves moved out of their normal position must be tagged. NRC believes it prudent that if the tag-out of a vent or drain path is intended to protect personnel or equipment, i.e., preventing a hydraulic lock, buildup of fluid, or to vent off a section of piping down stream of a potentially (or actually) leaking isolation boundary, then all of the valves in the vent or drain path should be tagged. Please respond to this concern.

LP&L SUPPLEMENTAL RESPONSE

LP&L's policy on tagging requires the following:

- 1) isolation boundary valves to be tagged;
- 2) actual vent or drain isolation valves to be tagged, i.e., any path that breeches the system;
- 3) repositioned valves within the isolation boundary to be tagged;
- 4) Operations personnel to review the tagout for adequacy; and
- 5) the "holder" of the tagout to walk it down and review it for adequacy.

LP&L's policy does not require the tagging of valves within the isolation boundary that are not repositioned. LP&L believes these controls to be sufficient to accomplish the goal of personnel and equipment protection and that unnecessary hardships with no additional margin of safety would be incurred if additional valves were required to be tagged. However, LP&L will ensure that verbiage in UNT-005-003 is sufficient guidance for comprehensive tagging, e.g., to address preventing hydraulic locks, personnel safety, leaking isolation valves, proper venting...

LP&L acknowledges that because this position may still differ from that of the NRC, full resolution of this issue may not be achieved by this supplemental response alone. Consequently, LP&L feels that it would be better to discuss the matter further during an LP&L/NRC conference call. Consequently, responsible Waterford 3 personnel will be contacting members of the NRC Region IV staff in the first week of December, 1989.

VIOLATION NO. 8917-06

NRC REQUEST

In Violation 382/8917-06, Examples 1 and 2, we noted that corrective action taken to revise the emergency diesel generator operating and annunciator response procedures, OP-009-002 and OP-600-007 respectively, was incomplete. OP-009-002 failed to show what the identification numbers and required positions were for the duplex filter and strainer selector valves. The revision to OP-600-007 did not address the operator response and plant effect when the fuel oil filters become clogged. In addition, the corrective actions taken to avoid further violations applied specifically to the immediate problem but did not address any actions taken to assure that other procedures were not ambiguous with regard to strainers, filters, and other selector valves. Please provide a supplemental response addressing actions you will take to avoid further violations.

LP&L Supplemental Response

After further review, LP&L concludes that the initial response provided for Examples 1 and 2 of Violation 8917-06 was marginal because the corrective actions taken may have been insufficient to prevent further violations in the same area. Consequently, the following additional actions are being taken to ensure this goal is achieved.

LP&L responded to Example 1 of the violation by making a change to Operating Procedure OP-009-002, "Emergency Diesel Generator," to ensure that the initial lineup for EDG fuel oil strainers and filters would be verified. When this change was made it was believed that because of vendor manual guidance, it was not necessary to include identification numbers and definitive handle positions. However, after further review, it is believed that this information should be procedurally enhanced. As of 11/09/89, the inlet and outlet valves for fuel oil filters and strainers have been added to the standby valve lineups for both trains of the EDG, which is provided in Attachments 11.1 and 11.2 of OP-009-002.

In response to Example 2 of the violation, LP&L approved a change to Operating Procedure OP-600-007, "Annunciator Response for Emergency Diesel Generator A or B Local Panel." The change addressed actions necessary to be taken by the operator in response to a clogged fuel oil duplex strainer. However, due to an inadvertent oversight, a similar change was not made to include the actions necessary to be taken by the operator in response to a clogged fuel oil duplex filter. Accordingly, on 09/08/89, a change to OP-600-007 was approved to add the necessary information. Subsequent to this change, as part of the Operations Procedure Upgrade effort, OP-600-007 was totally reformatted and human factor engineered. Specific to this issue, the information provided for the "Fuel Oil Strainer or Filter High Differential Press" Annunciator, which previously had been provided on two

separate sheets (one for filters and one for strainers), has been consolidated, enhanced and arranged in a format consistent with other annunciator response procedures.

Because LP&L initially considered this violation as an isolated incident, it was felt that a review of related procedures with regard to other duplex strainers and filters was not necessary. Upon further review, LP&L believes that this type of review is necessary to fully ensure that related procedures do contain the necessary vendor manual information. This review is scheduled to be completed by 11/30/89, at which time procedure changes will be initiated if warranted.

Based on these actions, LP&L is confident that recurring deficiencies in the area of strainers, filters and other selector valves will be prevented in the future.