

DEC 27 1989

In Reply Refer To:
Docket: 50-382
EA 89-212

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

Gentlemen:

This refers to the Enforcement Conference conducted at Region IV's request in the NRC Region IV office on December 11, 1989. This meeting related to activities authorized by NRC License NPF-38 for Waterford Steam Electric Station, Unit 3, and was attended by those on the attached Attendance List.

The subjects discussed at this meeting are described in the enclosed Meeting Summary.

It is our opinion that this meeting was beneficial and has provided a better understanding of the findings documented in NRC Investigation 4-89-002. In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter will be placed in the NRC's Public Document Room.

Should you have any questions concerning this matter, we will be pleased to discuss them with you.

Sincerely,

Original Signed By:
Samuel J. Collins

Samuel J. Collins, Director
Division of Reactor Projects

Enclosure:
Meeting Summary w/attachments

cc w/enclosure:
Louisiana Power & Light Company
ATTN: R. P. Barkhurst, Vice President
Nuclear Operations
P.O. Box B
Killona, Louisiana 70066

RIV:DRP/ASW
ATHowell
12/27/89
C:DRP/Barkhurst
DDChamberlain
12/27/89
D:DRP
SJCcollins
12/27/89

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PDR ADCK 05000382
Q PDC

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Louisiana Power & Light Company

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Louisiana Power & Light Company
ATTN: J. R. McGaha, Jr., Plant Manager
P.O. Box B
Killona, Louisiana 70066

Louisiana Power & Light Company
ATTN: L. W. Laughlin, Site
Licensing Support Supervisor
P.O. Box B
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Louisiana Power & Light Company
ATTN: G. M. Davis, Manager, Events
Analysis Reporting & Response
P.O. Box B
Killona, Louisiana 70066

Monroe & Leman
ATTN: W. Malcolm Stevenson, Esq.
201 St. Charles Avenue, Suite 3300
New Orleans, Louisiana 70170-3300

Shaw, Pittman, Potts & Trowbridge
ATTN: Mr. E. Blake
2300 N Street, NW
Washington, D.C. 20037

Middle South Services, Inc.
ATTN: Ralph T. Lally, Manager
of Quality Assurance
P.O. Box 61000
New Orleans, Louisiana 70161

Chairman
Louisiana Public Service Commission
One American Place, Suite 1630
Baton Rouge, Louisiana 70825-1697

Louisiana Power & Light Company
ATTN: R. F. Burski, Manager, Nuclear
Safety and Regulatory Affairs
317 Baronne Street
New Orleans, Louisiana 70112

Department of Environmental Quality
ATTN: William H. Spell, Administrator
Nuclear Energy Division
P.O. Box 14690
Baton Rouge, Louisiana 70898

Louisiana Power & Light Company

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President, Police Jury
St. Charles Parish
Hahnville, Louisiana 70057

Mr. William A. Cross
Bethesda Licensing Office
3 Metro Center
Suite 610
Bethesda, Maryland 20814

U.S. Nuclear Regulatory Commission
ATTN: Resident Inspector
P.O. Box 822
Killona, Louisiana 70066

U.S. Nuclear Regulatory Commission
ATTN: Regional Administrator, Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

bcc to DMB (IE14)

bcc distrib. by RIV:
R. D. Martin
Section Chief (DRP/A)
DRSS-FRPS
Project Engineer (DRP/A)
D. Wigginton, NRR Project Manager (MS: 13-D-18)
G. Sanborn, EO

Resident Inspector
DRP
DRS
Lisa Shea, RM/ALF
RIV File

MEETING SUMMARY

Licensee: Louisiana Power & Light Company (LP&L)
Facility: Waterford Steam Electric Station, Unit 3 (Waterford 3)
License No.: NPF-38
Docket No.: 50-382
Subject: ENFORCEMENT CONFERENCE CONCERNING NRC FINDINGS (NRC
INVESTIGATION NO. 4-89-002)

On December 11, 1989, representatives of LP&L met with Region IV personnel in Arlington, Texas, to discuss the findings contained in NRC Investigation 4-89-002 that was completed in September 1989. The meeting was held at the request of Region IV. The attendance list and licensee presentation are attached to this summary.

The licensee's presentation addressed NRC concerns that pertained to this investigation. LP&L stated that it accepted the NRC's findings regarding the truthfulness of a quality control (QC) inspector, however, it maintained that the fire seal work that this individual was involved in was correctly performed. The QC inspector, who was the subject of this investigation, was removed from the performance of all safety-related work at Waterford 3 on December 5, 1989.

Attachments:

1. Attendance List
2. Licensee Presentation (NRC distribution only)

ATTENDANCE LIST

Attendance at the Enforcement Conference between LP&L and NRC on December 11, 1989, in the NRC Region IV office:

LP&L

J. Dewease, Senior Vice President, Nuclear
R. Burski, Manager, Nuclear Safety & Regulatory Affairs
S. Lockhart, Manager, Nuclear Quality Assurance
T. Gerrets, Manager, Nuclear Services
B. Collyer, Fire Protection Engineer
W. Laporte, QA Support

SHAW, PITTMAN, POTTS, & TROWBRIDGE

E. Blake, Legal Counsel

NRC

S. Collins, Director, Division of Reactor Projects (DRP)
J. Callan, Director, Division of Reactor Safety (DRS)
D. Chamberlain, Chief, Reactor Project Section A, DRP
G. Sanborn, Enforcement Officer
A. Howell, Project Engineer, DRP
W. Smith, Senior Resident Inspector, DRP
W. Brown, Regional Counsel
M. Murphy, Reactor Inspector, DRS

NRC, OFFICE OF ENFORCEMENT

R. Perfetti, Enforcement Specialist

NRC CONCERNS*

- **THE TRUTHFULNESS OF THE INDIVIDUAL WHOSE INACCURATE STATEMENTS CONSTITUTE A POTENTIALLY SIGNIFICANT VIOLATION OF 10CFR50.9**
- **THE IMPLICATIONS OF THE INDIVIDUAL'S ACKNOWLEDGEMENT THAT HE HAD NOT PERFORMED THE NECESSARY INSPECTIONS OF THE FIRE SEAL WORK**
- **IMPLICATIONS OF THIS ADMISSION ON OTHER QUALITY CONTROL INSPECTIONS FOR WHICH THE INDIVIDUAL WAS RESPONSIBLE**
- **NRC QUESTIONS WHETHER THE PRACTICE OF THIS INDIVIDUAL REFLECTS A GENERAL ATTITUDE TOWARDS QUALITY CONTROL WORK AMONG THOSE IN SIMILAR POSITIONS AT WATERFORD 3**

*REFERENCE NRC REGION IV LETTER TO LP&L (11-2-89)

NRC REQUESTS*

- **DISCUSS THE APPARENT VIOLATION OF NRC'S REQUIREMENT REGARDING THE ACCURACY OF INFORMATION**
- **DISCUSS ANY PROCEDURAL VIOLATIONS THAT MAY HAVE OCCURRED**
- **DISCUSS THE IMPLICATION OF THE INDIVIDUAL'S ADMISSION ON ANY INSPECTION WORK FOR WHICH HE HAS BEEN RESPONSIBLE**
- **DISCUSS THE STATUS OF THIS INDIVIDUAL REGARDING HIS RESPONSIBILITY FOR SAFETY-RELATED ACTIVITIES AT WATERFORD**

*REFERENCE NRC REGION IV LETTER TO LP&L (11-2-89)

LP&L REVIEW PROCESS

- **REVIEWED NRC REPORTS**
- **INTERVIEWED 35 PERSONS**
 - **ANCO**
 - **LP&L QC**
 - **LP&L MAINTENANCE**
- **REVIEWED DOCUMENTATION**
 - **PROCEDURES**
 - **INSPECTION LOGS**
 - **TEST DATA**

ACCURACY OF INFORMATION

- **LP&L ACCEPTS NRC CONCLUSION STATED IN LETTER (11-2-89) REGARDING ACCURACY OF INFORMATION BY THE INDIVIDUAL**
- **LP&L'S REVIEW INDICATES THIS INCIDENT IS AN ISOLATED CASE**

FIRE SEAL PROCEDURAL VIOLATIONS

PROCEDURE AS WRITTEN *

- 1. VERIFY FOAM DENSITY**
- 2. DIG OUT 2"**
- 3. APPLY SEALANT**
- 4. INSPECT 2 & 3**

IN PRACTICE *

- 1. VERIFY FOAM DENSITY**
- 2. DIG OUT 2"**
- 3. INSPECT 2"**
- 4. APPLY SEALANT**
- 5. INSPECT SEALANT**

- **THE FOAM DENSITY HOLD POINT WAS VIOLATED IN SOME INSTANCES WITH REGARD TO SEQUENCE**
- **THE 2" INSPECTION AND THE FINAL INSPECTION HOLD POINT WERE NOT VIOLATED**
- **PROCEDURE WAS REVISED IN APRIL, 1988 TO REFLECT "IN PRACTICE" SEQUENCE**

* SIMPLIFIED

IMPLICATIONS ON FIRE SEAL WORK

- **REVIEW INDICATES THAT FINAL INSPECTION OF FIRE SEALS WAS DONE AS REQUIRED BY PROCEDURE**
- **FINAL INSPECTION OF FIRE SEAL PROVIDES HIGH DEGREE OF CONFIDENCE WITH REGARD TO ACCEPTABILITY OF SEAL**
 - **OBVIOUS SEAL ADHESION PROBLEMS WOULD HAVE BEEN IDENTIFIED**
 - **APRIL, 1989 TESTS DEMONSTRATED EXCELLENT ADHESION OF SILICONE FOAM INSTALLED EVEN ON TOP OF UNDISTURBED SILICONE FOAM**
- **FIRE SEAL REINSPECTION PROGRAM CONDUCTED NOVEMBER 1988 - NOVEMBER 1989**
 - **OBVIOUS SEAL ADHESION PROBLEMS WOULD HAVE BEEN IDENTIFIED**
- **SILICONE FOAM EXPANDS 1% FOR EACH 18 °F OF TEMPERATURE RISE**
 - **SMALL GAPS WOULD NOT IMPACT SEAL FUNCTION**
- **ONGOING FIRE SEAL SURVEILLANCE PROGRAM IS CONTINUING TO BE IMPLEMENTED**
 - **10% INSPECTED EVERY 18 MONTHS**
- **FIRE SEALS ARE ACCEPTABLE**

IMPLICATION ON OTHER INSPECTION WORK BY INDIVIDUAL

- **LP&L INTERVIEWED 35 INDIVIDUALS**
 - **LP&L QC INSPECTORS**
 - **LP&L MAINTENANCE PERSONNEL**
 - **ANCO PERSONNEL**
- **NO OTHER EVIDENCE OF MISSED INSPECTIONS WAS FOUND REGARDING THIS INDIVIDUAL**
- **LP&L PREPARED FOR REINSPECTION IF NECESSARY**
- **OTHER INSPECTION WORK BY INDIVIDUAL IS ACCEPTABLE**

GENERAL ATTITUDE OF OTHER QC INSPECTORS TOWARDS QUALITY CONTROL

- **LP&L INTERVIEWED 35 INDIVIDUALS**
 - **LP&L QC INSPECTORS**
 - **LP&L MAINTENANCE PERSONNEL**
 - **ANCO PERSONNEL**
- **REVIEW INDICATES THAT VERY FEW INSPECTIONS HAVE BEEN MISSED**
 - **LP&L PRACTICE IS TO WRITE QN'S ON MISSED INSPECTIONS**
 - **REVIEW FOUND 13 INSPECTIONS MISSED OUT OF OVER 60,000 INSPECTIONS CONDUCTED DURING 1987 - 1989**
 - **IMPORTANCE OF COMPLYING WITH HOLD POINTS IS CLEARLY RECOGNIZED BY QC AND MAINTENANCE PERSONNEL**
- **QUALITY TEAM REVIEWED 128 CONCERNS IDENTIFIED FROM JANUARY 1988 TO NOVEMBER 15, 1989**
 - **NO OTHER QUALITY TEAM CONCERNS RELATING TO INSPECTION WERE IDENTIFIED DURING THIS PERIOD (CURRENTLY REVIEWING 1989 OUTAGE RELATED CONCERNS)**

MANAGEMENT DIRECTION

- **REASON FOR POSITIVE ATTITUDE OF PERSONNEL IS MANAGEMENT EMPHASIS ON PROCEDURE COMPLIANCE**
- **PRINCIPLES FOR ENHANCING PROFESSIONALISM**
 - **EVERY EMPLOYEE IS RESPONSIBLE FOR DEMONSTRATING PROFESSIONALISM IN HIS OR HER JOB PERFORMANCE**
 - **INTEGRITY IS THE MOST VALUED AND ESSENTIAL ATTRIBUTE OF THE NUCLEAR OPERATIONS EMPLOYEE**
 - **EMPLOYEES SHOULD BE ACCOUNTABLE FOR THEIR ACTIONS**
 - **FEEDBACK TO MANAGEMENT ON POLICIES AND PROCEDURES IS HIGHLY ENCOURAGED**
 - **COMPLIANCE WITH PROCEDURES IS ESSENTIAL**
 - **IF A PROCEDURE IS SUSPECTED TO BE WRONG, SEEK GUIDANCE FROM SUPERVISOR BEFORE PROCEEDING FURTHER**
- **PROFESSIONALISM IS EMPHASIZED IN VIDEO TAPE DURING GET TRAINING**
- **PLANT DIRECTIVE, NO. 11 (PROCEDURE COMPLIANCE), IS BEING REVIEWED WITH PLANT AND QA PERSONNEL DURING ONE ON ONE COUNSELING SESSIONS**
 - **WILL BE COMPLETED BY DECEMBER 31, 1989**

STATUS OF THE INDIVIDUAL

- **REMOVED FROM PERFORMING SAFETY-RELATED QA INSPECTIONS APRIL 12, 1989**
- **DURING PERIOD OF APRIL 12, 1989 TO DECEMBER 5, 1989 PERFORMED VALIDATIONS AND PROCEDURE REVIEWS FOR QA**
- **AFTER DECEMBER 5, 1989 REMOVED FROM THE PERFORMANCE OF ALL SAFETY-RELATED WORK**