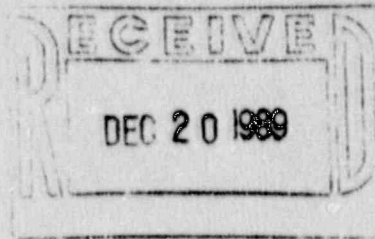




LP&L

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J. G. Dawesee
Senior Vice President
Nuclear Operations

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QA

December 19, 1989

R. D. Martin
Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive - Suite 1000
Arlington, Texas 76011

Subject: Waterford 3
Docket No. 50-382
License No. NPF-38
Enforcement Conference-Additional Information

Dear Mr. Martin:

As a result of questions raised by your staff in the enforcement conference on December 11, 1989, LP&L is providing the following additional information.

NRC personnel questioned whether the procedural inadequacy identified in 1988 had been entered into LP&L's corrective action program. Although in preparing for the enforcement conference we established that the procedure had been corrected in April 1989, we also determined that a quality notice (QN) had not been issued. A QN has now been initiated and the engineering review will be formalized.

NRC personnel questioned whether any of our QA audits of the Fire Protection Program identified the problem with Procedure ME-13-100 and, if so, how the problem was dispositioned. A review of the Fire Protection Program audits determined that while audits did result in the issuance of a number of audit findings, the problem related to inspection sequence had not been identified.

NRC personnel questioned whether the interview process was sufficient to determine whether a larger problem exists than was first disclosed, observing that a sampling inspection might provide further assurance that a problem does not exist. LP&L has reviewed the interview process and we conclude it was adequate to determine the scope of the problem in this particular instance. We believe that the information we received from the individuals during the interviews was true and accurate. The confidentiality of the information provided by those interviewed was assured and, in general, the individuals were not requested to provide information related to their own experience. The interview process questioned both maintenance and supervisory personnel responsible for performing the work and QC personnel responsible for performing hold point verifications, and both groups clearly understand and implement their responsibilities with respect to hold points.

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Enforcement Conference-Additional Information

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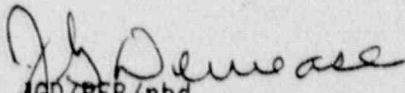
December 19, 1989

NRC personnel were concerned that the procedure was inadequate for a long period of time and personnel worked around the procedure rather than take appropriate actions to have the procedure corrected. As we have discussed with your staff previously, this has been an area of concern to us as well. LP&L has undertaken programs to upgrade procedures, enhance procedural compliance, and to educate our personnel on management's standards and expectations. We believe that although this type of problem occurred in the past, there is an improving trend in this area.

The above responds to questions raised in the enforcement conference. I would also like to inform you of other actions I have taken subsequent to the enforcement conference. First, a letter will be issued from myself to all Nuclear Operations personnel outlining the actions LP&L has taken as a result of these events and the expectations of management. Secondly, the involved individual has agreed to meet with QA/QC personnel to openly discuss his personal experiences regarding this incident. This will be completed by January 15, 1990.

Thank you for this opportunity to provide additional information. If you have any questions, please call.

Very truly yours,


JGD/RFB/nbd

cc: Messrs. F.J. Hebdon, NRC-NRR
D.L. Wigginton, NRC-NRR
E.L. Blake
W.M. Stevenson
NRC Resident Inspectors Office