

JAN 10 1990

In Reply Refer To:
Docket: 50-382/89-34

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 letter of December 26, 1989, in response to our letter and Notice of Violation dated November 27, 1989. We have reviewed your reply 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:
Samuel J. Collins

Samuel J. Collins, Director
Division of Reactor Projects

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

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
Killona, Louisiana 70066

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Louisiana Power & Light Company

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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

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 (IE01)

bcc distrib. by RIV:

R. D. Martin

Section Chief (DRP/A)

DRSS-FRPS

Project Engineer (DRP/A)

RIV File

D. Wigginton, NRR Project Manager (MS:

Lisa Shea, RM/ALF

Resident Inspector

DRP

MIS System

RSTS Operator

DRS

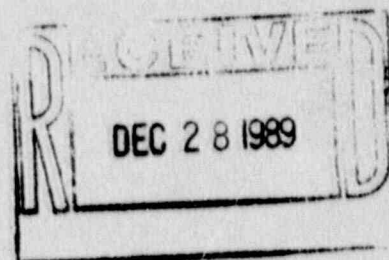
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Louisiana Power & Light Company
317 Baronne Street
P. O. Box 60340
New Orleans, LA 70160-0340
Tel. 504 595 2805

R. F. Burski
Nuclear Safety & Regulatory Affairs-
Manager

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QA



December 26, 1989

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Subject: Waterford 3 SES
Docket No. 50-382
License No. NPF-38
NRC Inspection Report 89-34
Reply to a Notice of Violation

Gentlemen:

In accordance with 10 CFR Part 2.201, Louisiana Power & Light hereby submits in Attachment 1 the response to the Notice of Violation identified in Appendix A of the subject Inspection Report.

If you have any questions concerning this response, please contact T.J. Gaudet at (504) 464-3325.

Very truly yours,

RFB/TJG/ssf
Attachment

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

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ATTACHMENT 1

LP&L RESPONSE TO THE NOTICE OF VIOLATION IDENTIFIED IN APPENDIX A
OF INSPECTION REPORT 89-34

VIOLATION NO. 8934-03

Failure to Follow Procedure

Technical Specification 6.8.1.c requires, in part, that written procedures shall be implemented for surveillance and test activities on safety-related equipment.

Operating Procedure OP-009-002, Revision 10, "Emergency Diesel Generator," (EDG) paragraph 5.1.10, requires verification that both sets of EDG turbocharger lube oil filters are in service for the initial lineup.

Surveillance Procedure OP-903-069, Revision 7, "Integrated Emergency Diesel Generator/Engineering Safety Features Test," paragraph 5.6, requires the EDG to be aligned for "STANDBY" in accordance with OP-009-002 above.

Contrary to the above, on October 29 and 30, 1989, during the 24-hour run and subsequent loss of offsite power test of EDG B in accordance with paragraph 8.3.5 of OP-903-069, only one set of the EDG turbocharger lube oil filters was in service.

This is a Severity Level V violation.

RESPONSE

(1) Reason for the Violation

LP&L admits that the above cited violation did occur in that the 24-hour EDG surveillance was performed on Diesel 'B' with one set of filters isolated in violation of the valve lineup attachment and paragraph 5.1.10 of OP-009-002. The root cause of the violation was a failure to have administrative controls in place to account for the repositioning and subsequent restoration of valves or components (the EDG filter set in this case) under allowable conditions that are not addressed by any pre-existing tracking mechanisms, e.g., clearances, caution tags, operating procedures, special test procedures, etc. It should be noted, however, that prior to the citing of the violation, the Operations department had already initiated the development of an Operating Instruction to address such situations (as was acknowledged by the NRC on page 9 of Appendix B to Inspection Report 89-34 dated November 27, 1989).

On October 27, 1989, when EDG 'B' was started to test the simulated loss of offsite power per OP-903-069, the diesel tripped on overspeed. Through subsequent troubleshooting the Reactor Auxiliary Building (RAB) operator discovered that the o-ring on the right side strainer (Component No. EGLMFLT0002B) on the turbocharger lube oil duplex strainer was faulty which caused an oil leak. Using the selector valve, the operator repositioned the EDG 'B' lube oil filter set (EGL-214B and EGL-215B) from their standby lineup position to isolate the oil leak on the right side. This condition (a deviated lineup) was noted in the RAB Watchstation Turnover sheet and in the RAB Narrative log. Additionally, a condition identification (CI No. 266215) was generated to replace the o-ring. The deviated valve lineup remained in effect ("as-is") until October 31, 1989, at which time the faulty o-ring was replaced and the filter set was placed back in service (the position required for normal operation).

On October 29 and 30, 1989, however, a 24-hour EDG run and subsequent loss of offsite power test was performed per OP-903-069 on the 'B' Diesel. Because of the deviated valve lineup, this test was subsequently performed with the selector valve in the wrong position. Although the deviated lineup had been identified on a Turnover Sheet and Log as stated above, there was no mechanism in place to ensure continued accountability of the deviated valve lineup since this was an allowed condition for maintenance not tied to or traceable by an existing mechanism, such as a clearance, caution tag, operating procedure, etc., that would have ensured accountability of the valve from repositioning to subsequent restoration of its normal position.

(2) Corrective Steps Which Have Been Taken and the Results Achieved

Because this violation did not pose any immediate safety concerns (plant safety was not jeopardized, plant equipment was not damaged, and maintenance did not have to be performed because of the deviated lineup), there were no immediate or remedial corrective actions that had to be taken. The only action that was necessary was to ensure that the filter set was returned to its normal position (in service), which as stated above was done on 10/31/89 after replacement of the o-ring. It should be noted that an initial standby valve lineup for the EDG "B" was performed prior to the tests on October 20, 1989 to verify the proper alignment per OP-009-002.

Also, because another larger filter (EGLMFLT0001B) is in the path of the lube oil system, it is unlikely that the turbocharger lube oil filter would clog. The deviated lineup did not affect the performance of the EDG runs (no shutdowns), and there was no evidence of lube oil starvation of the turbocharger.

(3) Corrective Steps Which Will Be Taken to Avoid Further Violations

Operating Instruction OI-027-000 is under development to provide the administrative controls necessary to track the status of valves and components that have been deviated from their required standby lineups under conditions not currently covered by other means, such as clearances, caution tags, operating procedures, etc. LP&L is confident that this Instruction will prevent a violation of a similar type from occurring in the future.

(4) Date When Full Compliance Will Be Achieved

OI-027-000 will be implemented by March 2, 1990, at which time LP&L will be in full compliance.