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QA

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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 89-37

Gentlemen:

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

If you have any questions concerning this response, please contact L.W. Laughlin at (504) 464-3499.

Very truly yours,

R. F. Burski

RFB/DDG/ssf
Attachment

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

LP&L RESPONSE TO THE VIOLATION IDENTIFIED IN APPENDIX A
OF INSPECTION REPORT 89-37

VIOLATION NO. 8937-01

Failure to Follow a Procedure and Implementation of an Inadequate Procedure

During an NRC inspection conducted on November 13-17, 1989, a violation of NRC requirements was identified. The violation involved a failure to follow a procedure and implementation of an inadequate procedure. In accordance with the "General Statement of Policy and Procedure for NRC enforcement Actions," 10 CFR Part 2, Appendix C (1989) (Enforcement Policy), the violation is listed below:

> Technical Specification 6.8.1.a requires, in part, that written procedures shall be established and implemented as recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.
>
> Regulatory Guide 1.33, Revision 2, requires that maintenance of safety-related equipment be properly preplanned and performed in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances.
>
> Maintenance Procedure MM-12-001, Revision 1, "Pipe Hanger Support Installation Fabrication and Removal," requires that personnel record the actual hot/cold load settings of spring hangers after installation.
>
> Maintenance Procedure MM-12-004, Revision 1, "Fabrication and Installation of Piping," requires a quality control (QC) acceptance sign-off for piping systems, hangers, and supports in accordance with Specification 1564.100 after installation.
>
> Contrary to the above:
>
> (1) Installation records for Spring Hanger HVSH-4028 indicated that personnel did not record the actual hot/cold settings as required by procedure after final installation.
>
> (2) Maintenance Procedure MM-12-004 did not contain adequate QC inspection acceptance criteria for spring hanger settings. As the result of this inadequacy, Spring Hanger HVSH-4028 was not installed in accordance with design drawing settings.

This is a Severity Level IV violation.

RESPONSE

(1) Reason for the Violation

Item 1

LP&L admits to Item 1 of the violation in that personnel did not record the actual hot/cold settings for Spring Hanger HVSH-4028 as required by Maintenance procedure MM-12-001. The root cause for this item was personnel error. Personnel involved failed to record the spring hanger setting in accordance with procedure MM-12-001.

This hanger was installed on the Containment Atmosphere Release (CAR) system on May 18, 1988 under Station Modification Package (SMP) 1322 during the Refuel 2 outage. The spring setting was at its upper limit (topped out) and the spring of the pipe support was not loaded and did not support the pipe as designed.

Item 2

LP&L admits to Item 2 of the violation involving implementation of an inadequate procedure. Procedure MM-12-004 was inadequate regarding QC inspection acceptance sign-offs for piping systems, hangers and supports. Consequently, Spring Hanger HVSH-4028 was not installed in accordance with design drawings settings. The root cause for this item was improper human factor engineering of procedure MM-12-004. LP&L believes that the overall content of procedure MM-12-004 is adequate. However, the inspection criteria described in procedure MM-12-004 for piping system adequacy and overall appearance is vague and resulted in this violation.

Because this procedure is intended to provide the general methods that control the fabrication, installation, and inspection of piping/components at Waterford 3, no explicit details were factored into the inspection acceptance criteria for spring hanger settings.

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

Item 1

Condition Identification (CI) 266769 was issued upon discovering that Spring Hanger HVSH-4028 was set at its upper limit and did not support the pipe as designed. An engineering evaluation included in the CI concluded that the CAR system was operable and Waterford 3's operability and integrity was not impaired by the as found condition of the spring hanger.

The individual responsible for this violation has left LP&L employment and no corrective action with the individual is possible. However, a memorandum has been sent to Quality Assurance, Maintenance and Construction personnel discussing the specific violation, corrective actions and the importance of following procedure. This memorandum will be required reading under the Quality Assurance and Construction recurring training program. The importance of this will be discussed by the Maintenance Superintendent with Maintenance Supervision.

In addition, review of the installation records by LP&L for Spring Hanger HVSH-4028 indicated documentation discrepancies. The discrepancies include missing checklists and improperly completed forms. As a result, QN-QA-90-026 was generated to evaluate and resolve the discrepancies.

Item 2

Procedure MM-12-004, Revision 1, has been reviewed by Construction personnel in response to this violation. This review indicated that the criteria for the QC hold point were too general and segments of piping, hanger and support installations may not receive adequate QC inspection.

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

Item 1

Spring Hanger HVSH-4028 will be modified and the spring will be reset to its design load.

It is important to note that supports, including spring cans, are required to be examined under the inservice inspection of class 1 (IWB), class 2 (IWC) and class 3 (IWD) components included in Waterford 3's Ten Year Inservice Inspection Program. Based on this selection process, LP&L is confident that deficiencies in spring can installations will be identified and addressed in a timely manner.

In addition, a follow-up surveillance will be performed by the Site Quality organization to assure that support installations are being performed and documented in accordance with site procedures.

Item 2

Procedure MM-12-004 will be revised to provide greater details regarding inspection criteria concerning the QC hold point for the installation of piping systems, hangers and supports.

(4) Date When Full Compliance Will Be Achieved

Items 1 and 2

The actions identified above will be completed no later than September 1, 1990, at which time LP&L will be in full compliance.