

FEB 13 1990

In Reply Refer To:  
Docket: 50-382/89-29

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

Gentlemen:

Thank you for your letter of January 2, 1990, in response to our letter and Notice of Violation dated November 30, 1989. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. Furthermore, your response provided enough additional insight and description to warrant the reduction of the violation severity level to a Level V. 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. Mcbaha, Jr., Plant Manager  
P.O. Box B  
Killona, Louisiana 70066

RIV:TPS  
MEMurphy/lb  
2/19/90

C:TPS  
WCSeidle  
2/19/90

D:DRS  
LJCallan  
2/19/90

D:Collins  
S00611ins  
2/13/90

9002260565 900213  
PDR ADOCK 05000382  
G PNU

IE01  
111

Louisiana Power & Light Company

-2-

Louisiana Power & Light Company  
ATTN: L. W. Laughlin, Site  
Licensing Support Supervisor  
P.O. Box B  
Killona, Louisiana 70066

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	Resident Inspector
Section Chief (DRP/A)	DRP
DRSS-FRPS	MIS System
Project Engineer (DRP/A)	RSTS Operator
RIV File	DRS
D. Wigginton, NRR Project Manager	(MS: 13-D-18)
Lisa Shea, RM/ALF	M. E. Murphy
W. C. Seidle	



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

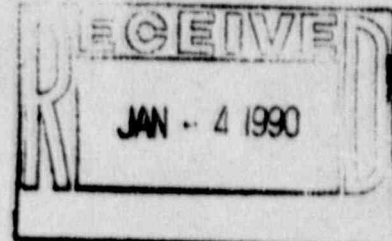
R. F. Burski  
Nuclear Safety & Regulatory Affairs  
Manager

W3P89-2171  
A4.05  
QA

January 2, 1990

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 89-29



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,

RFB/DDG/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

9041080210 (4P)

IC-90-010

ATTACHMENT 1

LP&L RESPONSE TO THE VIOLATION IDENTIFIED IN APPENDIX A  
OF INSPECTION REPORT 89-29

VIOLATION NO. 8929-02

Failure to Provide Adequate Test Control

Criterion XI of 10 CFR Part 50, Appendix B, requires, in part, that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures, which incorporate the requirements and acceptance limits contained in applicable design documents.

Contrary to the above, Temporary Alteration (TA) 89-22 was made during refueling outage three to provide temporary services through a containment building penetration. The licensee failed to identify and perform a post-installation test to prove operability of the temporary penetration closure for the potential conditions in the containment building during the period of installation.

This is a Severity Level IV violation.

RESPONSE

(1) Reason for the Violation

The root cause of this violation is incomplete documenting of the engineering evaluation for Temporary Alteration (TA) 89-22. TA 89-22 was initiated to provide a method of passing electrical cables and/or mechanical hoses through the containment building during Refuel 3 and provide containment isolation via the HVAC vacuum breaker line (Penetration 13).

As described in the TA package, the temporary enclosure of the penetration consisted of a 1" thick by 24" diameter blind flange which contained various size holes. Pipe nipples were welded to these holes to permit passage of electrical cables and air hoses for temporary containment services during refueling. The flange assembly was secured to the existing penetration with twenty 1 1/4 - 8 stud bolts and nuts. Two O-rings were used to provide a seal between the containment and the piping interior. This is the same configuration that is used to perform the Local Leak Rate Test (LLRT) of valve CVR-202. As discussed in the TA package, the space between the pipe nipples and the temporary electrical cables and/or mechanical hoses were sealed with RTV silicone sealant to prevent air leakage from containment.

The text of the Inspection Report states in part, "The TA/WA package was silent on either a containment building penetration tightness test or an engineering evaluation." It should be noted that an evaluation was performed by Plant Engineering and included in the TA package. LP&L consciously chose not to perform a post-installation test since the evaluation prior to the installation concluded that the installation would provide adequate containment integrity for Mode 5 and 6 conditions.

From LP&L's communication with the inspector during the inspection, it is LP&L's understanding that the violation was initiated because the evaluation failed to explicitly state that the flange (secured by 20 bolts and sealed with double O-rings) was adequate to prevent air leakage from containment. LP&L agrees that such an explicit statement was not contained in the evaluation documentation. However, LP&L disagrees with the contention identified by the title of the violation that omission of the explicit statement regarding the evaluation of the flange represents a "Failure to Provide Adequate Test Control". LP&L considers the TA package to be technically adequate for the following reasons:

- 1) The evaluating engineer was aware that the flange assembly was previously used for Local Leak Rate Testing (LLRT) and therefore was sufficient for its intended purpose.
- 2) The evaluating engineer specified using the Mechanical Maintenance Torquing procedure (MM-6-011) in the TA package to ensure the flange assembly was properly attached to the penetration.
- 3) The TA package from the previous refueling outage (TA 88-011) was consulted and referenced in the TA. That package specified that the flange assembly was sufficient for this specific application. By referencing the previous package the evaluating engineer acknowledged the acceptability of the flange assembly.

Based on the above, LP&L agrees that, for completeness of the documentation, the evaluation should have contained an explicit statement regarding the suitability of the flange seal and therefore admits the violation.

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

The details surrounding this violation have been discussed with the Plant Engineering staff to stress the importance of complete documentation of evaluations for TAs.

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

LP&L believes this violation is an isolated case. This was determined since the subject inspection reviewed 26 TA packages and found only this one case of inadequate documentation of an engineering evaluation. Therefore, the corrective action discussed in section (2) is adequate to avoid further violations.

(4) Date When Full Compliance Will Be Achieved

LP&L is currently in full compliance.