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December 20, 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 89-23
Reply to a Notice of Violation (EA 89-192)

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 your letter dated November 20, 1989.

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
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ATTACHMENT 1

LP&L RESPONSE TO THE NOTICE OF VIOLATION IDENTIFIED IN YOUR LETTER
DATED NOVEMBER 20, 1989

VIOLATION

Failure to Follow Equipment Control Procedures

Technical Specification 6.8.1.a requires, in part, that written procedures shall be implemented for equipment control (e.g., tagging) as recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Procedure UNT-005-003, Revision 8, "Clearance Requests, Approval, and Release," requires release and removal of a red danger tag before operating the valve to which it is attached.

Contrary to the above, on August 23, 1989, an auxiliary operator operated Valve IA-5701 while a red danger tag was attached. This operation was observed by an NRC inspector.

This is a Severity Level IV violation.

RESPONSE

(1) Reason for the Violation

LP&L admits that this violation did occur as a result of personnel error.

On 8/23/89, Emergency Diesel Generator 'A' Fuel Cylinder Control Valve (EGA 409A) was being replaced under a Work Authorization (WA No. 01043900). Prior to installing the like replacement valve for EGA 409A, maintenance personnel requested an operator to open air valve IA-5701 in order to blow down moisture that had been trapped in the associated lines. Because Valve IA-5701 was danger tagged shut, the operator contacted the Control Room to obtain permission to open it. After receiving permission from the responsible Control Room Supervisor (CRS), the operator opened the valve. This action was in violation of partial release requirements contained in Section 5.9 of UNT-005-003. The operator should have removed the tag from the valve and have had the responsible maintenance personnel and CRS authorize the partial release on the applicable clearance form prior to operation of the valve. Additionally, the CRS should not have authorized the operation of Valve IA-5701 without the proper documentation.

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

Because of the significance of this violation (in that it was the third instance in which a danger tagged valve was operated contrary to the governing procedure) and due to its seriousness in relation to potential consequences (in that the objective of the danger tag policy (UNT-005-003) is to protect personnel and prevent equipment damage by providing the control necessary to safely remove and restore equipment and/or systems from service), numerous corrective actions have been taken.

To address the specific concerns of this violation, the following measures were initiated and/or taken immediately on 8/23/89:

- In accordance with the Waterford 3 Corrective Action Program, the Operations Department generated a quality notice (QN No. QA-89-181) to formally address and resolve the violation;
- In accordance with the Waterford 3 Improving Human Performance Program, the responsible Operations personnel were counselled on the requirements of UNT-005-003 and the necessity to follow them and were then required to present the requirements to each operating shift;
- Disciplinary action was taken in that the responsible CRS was given a day off; and
- The Operations superintendent issued a letter to Operations personnel which emphasized the need for strict procedure compliance in the release of a danger tag and noted that a failure to comply with the procedural requirements will result in disciplinary action.

To address the generic concerns in preventing similar danger tagging violations in the future, the following measures were taken:

- The Operations superintendent has personally spoken to all operations personnel on procedural compliance in general, with particular emphasis on danger tags;
- A discussion of this violation as well as the two previous violations in the same area was presented at the December Waterford 3 Safety Meetings which were held on 12/5/89 and 12/7/89 for plant personnel. Emphasis was placed on strict compliance with the Danger Tag Policy (UNT-005-003). Also stated was that a failure to comply with the policy will result in disciplinary action; and
- The Training Department has enhanced the General Employee Training Lesson Plan to place greater emphasis on danger tagging as well as on the ramifications for not complying with the governing procedure.

In addition to the above, as was stated in a presentation on the subject violation by LP&L representatives during the 10/24/89 Enforcement Conference (Reference NRC Letter EA 89-192 dated 10/31/89 from J.L. Milhoan to J.G. Dewease), LP&L is concerned with the general issue of procedure compliance and adequacy, has made improvements in this area through the implementation of various initiatives and programs and is committed to continue to improve through the implementation of additional initiatives and programs.

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

UNT-005-003 will be revised (Revision No. 9) to stress the consequences (disciplinary action) of violating the operation of danger tagged valves. Paragraph 4.1.2 of UNT-005-003 will specifically state:

No one may operate a danger tagged component. This restriction applies even if directed to do so by operations.

The only time an exception to the above could occur is under an emergency situation which would necessitate the Shift Supervisor to order the operation of a danger tagged component.

To address LP&L's commitment to continue to improve in the general area of procedure compliance and adequacy, plant staff personnel will receive one-on-one counselling on procedure compliance with emphasis on danger tagging.

Based on the above actions, LP&L is confident that similar violations for failing to follow the danger tagging policy will be prevented in the future.

(4) Date When Full Compliance Will Be Achieved

The actions identified above will be completed by January 1, 1990, at which time LP&L will be in full compliance.