MAR 16 1990

In Reply Refer To:
Docket: 50-382/89-32

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 14, 1989, in response to our letter and the attached Notice of Violation dated November 16, 1989. As a result of our review, we find that additional information is needed, as discussed with your Mr. R. Azzarello during a telephone call on March 6, 1990. Specifically, we do not accept your denial of the Notice of Violation, in that your response does not address: (1) your demonstrated ability in the October 1989 outage to perform magnetic particle examinations in at least two directions for the threaded section of the reactor vessel head closure nuts; (2) the identification in your Inservice Inspection Plan that a partial examination of the nuts was not applicable; and (3) the reason why an alternate surface examination technique was not employed during the 1988 refueling outage, if the examiners believed a two direction magnetic particle examination could not be performed. Accordingly, we continue to consider the citation in the Notice of Violation to be valid as stated.

It is our understanding from the March 6, 1990, telephone call that the reactor vessel head closure nuts, which were examined during the 1988 refueling outage, will be reexamined in two directions by magnetic particle examination during Refuel 5. Further, we understand that you will be providing us a supplemental response to the Notice of Violation that will address the areas required by 10 CFR Part 2.201 as well as the three issues discussed above. This supplemental response should also include your plans for reexamining the closure nuts during Refuel 5.

Please provide the supplemental information within 30 days of the date of this letter.

Sincerely,

Original Signed By:
Samuel J. Collins

Samuel J. Collins, Director
Division of Reactor Projects

cc: (see next page)

RIV:RI:MQPS*	C:MQPS*	D:DRS	D:DRP
BMcNeill/cjg	IBarnes	LJCallan	SJCollins
/ /90	/ /90	3/12/90	3/15/90

*Previously concurred

IE01

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bcc to DMB (IE01)

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W3P89-2157
A4.05
QA

December 14, 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 89-32

Gentlemen:

In accordance with 10 CFR Part 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/DMU/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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IC-89-722

ATTACHMENT 1

LP&L RESPONSE TO THE VIOLATION IDENTIFIED IN APPENDIX A OF INSPECTION REPORT 89-32

VIOLATION NO. 8932-01

Failure of ISI Examinations To Comply With Procedure and Code Requirements

Criterion V of Appendix B to 10 CFR Part 50 and the licensee's approved quality assurance program description require that activities affecting quality shall be accomplished in accordance with documented procedures.

Paragraph 6.4 in Procedure WTR-ISI-70, and Article T-761 in Section V of the ASME Code, require that magnetic particle examinations be conducted in at least two directions.

Contrary to the above, the NRC inspector found that the 18 reactor vessel nuts examined during the last outage on May 2, 1988, were examined in one direction only.

This is a Severity Level IV violation.

RESPONSE

LP&L does not believe that the situation addressed in Violation 8932-01 constitutes a failure of ISI examinations to comply with procedure and code requirements.

On May 2, 1988, during the second refueling outage, 18 reactor vessel closure head nuts were examined by magnetic particle (MT) in accordance with Waterford 3's 10 year inservice inspection program. An MT examination was performed on the inner diameter (ID) and outer diameter (OD) of each nut. The MT examination of the nut OD was successfully performed in two directions.

The MT examination of the nut ID was however, performed in only one direction. Due to the size of the MT yoke and the inner diameter of the nut, the Level II MT examiner determined the yoke could not be properly positioned inside the nut to perform the second direction perpendicular to the first. This limitation was documented on the reactor vessel nut examination data sheet and concurred with by the Westinghouse Level II examiner's supervisor, LP&L's Level III Inspector and the Authorized Nuclear Inservice Inspector (ANII). It is this examination that the NRC contends is a violation of procedure and code requirements.

The notice of violation states that Paragraph 6.4 in Procedure WTR-ISI-70, Magnetic Particle Examinations for Waterford Unit #3, and Article T-761 in ASME Section V, require that magnetic particle examinations be conducted in at least two directions. The violation, however, fails to note that paragraph 5.1 of this procedure also states that "Examination of the

required surface shall be to the maximum extent practical. Any area which precludes 100% coverage shall be recorded on Limitation to Examination (Welds) Form or Limitation to Examination (General) Form." Therefore, areas not accessible for the required examination shall be documented as such.

NRC Inspection Report 89-32 identified the fact that reactor vessel nut acceptance criteria have not yet been established by ASME Section XI, Table IWB-2500-1, Category B-G-1, Item B6.10. However, what both the Inspection Report and violation failed to note was that Code Item B6.10 has not yet established an examination requirement either. It is this Code requirement and the associated figure that will identify the specific area(s) of the nut that shall be examined. Without this Code requirement, there is nothing that specifies which areas of the nut should be examined.

In view of this, it would be perfectly acceptable to perform an MT examination in two directions on only the outside diameter (OD) of the nut. This would fulfill the literal requirements of ASME Section V, Section XI and WTR-ISI-70. However, in keeping with the spirit of the code, it has been LP&L's practice to perform as thorough an examination of the nut as the examiner determines possible. In this case, after performing an examination in one direction on the nut I.D., the examiner determined a credible examination 90° to the first could not be performed due to nut geometry.

In accordance with Paragraph 5.1 of WTR-ISI-70, this limitation was documented on the reactor vessel nut examination data sheet. Although the procedure states this should be recorded on the "Limitation to Examination (General) Form", when questioned on this in the NRC exit meeting of October 20, 1989, the NRC inspector stated the recording of this limitation on the data sheet was acceptable.

The inability to perform all or part of a required examination due to component configuration or proximity is not a new or unique situation. The NRC recognizes interferences will occur and that all component examination requirements can not be met. A relief request process has been established to address these situations. However, with no examination requirements specified in Section XI, this option is not appropriate. Therefore, limitations encountered when performing a reactor vessel nut ID examination will be addressed as already done; in accordance with Procedure WTR-ISI-70, Paragraph 5.1.

To summarize, LP&L contends no violation of the Code or procedure has occurred. The MT examiner determined a 2 directional examination was not possible and documented such per procedure. Because the Code does not provide specific examination requirements and acceptance criteria, there can be no violation of the Code.

LP&L will continue to perform the most comprehensive examination of the reactor vessel nuts possible. When ASME provides examination requirements and acceptance criteria, LP&L will make the necessary provisions to ensure total compliance. Should full compliance with these requirements not be practical or possible, a relief request will be prepared and submitted to the NRC for review.

Based on the information provided above, LP&L requests that Violation 8932-01 be re-evaluated.