



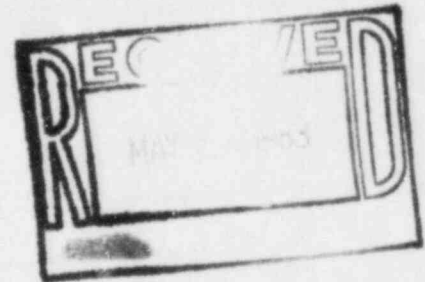
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April 29, 1983

L. V. MAURIN
Vice President Nuclear Operations

W3183-0147
Q-3-A35.02.01



Mr. G. L. Madsen, Chief,
Reactor Projects Branch, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012

SUBJECT: Waterford SES Unit 3
USNRC Inspection Report 50-382/83-09

Dear Mr. Madsen:

The following information regarding the violations cited by the USNRC Inspectors in USNRC Inspection Report No. 50-382/83-09 dated March 31, 1983, is hereby submitted:

1. Failure to Maintain Documentation for Installation of Safety-Related Electrical Equipment

Criterion XVII of 10 CFR 50, Appendix B, requires that sufficient records be maintained to furnish evidence of activities and shall be identifiable and retrievable.

- a. Contrary to the above, Ebasco Services, Inc., could not produce the inspection records for the installation of the motor for Control Room Supply Fan 3BSB. This safety-related motor was properly installed and inspection records for Fan 3BSB and associated air handling unit AH-12 were adequate.
- b. Contrary to the above, Fischbach & Moore could not produce the inspection records for the mounting of Diesel Generator Control and Relay Panel 3B-S. This panel was properly installed and the inspection records for the other panels associated with the 3B diesel generator were adequate.

This is a Severity Level V Violation (Supplement (II.E) [sic]
(382/8309-01).

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The following response is submitted:

FINDING 1.a

Corrective Action Taken and Results Achieved:

Nonconformance Report W3-5761 was written to address the finding. The NCR has an approved resolution to verify the fan motor installation and provide the necessary documentation. Installation verification was accomplished by LP&L via CIWAs 834546 and 828000. The NCR is presently being routed for verification of corrective action which will allow closure of the Nonconformance Report.

Action Taken To Preclude Recurrence:

Ebasco has established a Force Account Quality Control organization with responsibility for inspection of safety-related electrical activities to assure conformance with approved procedures.

Date When Corrective Action Will be Achieved:

Corrective Actions necessary to close NCR W3-5761 will be completed by May 15, 1983.

FINDING 1.b

Corrective Action Taken and Results Achieved:

Fischbach & Moore (F&M) wrote Nonconformance Report W3-971 (Ebasco NCR W3-5577) on January 26, 1983 to address the problem of incomplete installation documentation. The approved resolution for the NCR directs F&M to verify the mounting and provide the necessary documentation. CIWA 834830 was issued for F&M to proceed with the required work to close the NCR. F&M reviewed documentation for the other diesel generator to ensure that this was not a generic problem.

Action Taken to Preclude Recurrence:

Ebasco Force Account will assume responsibility for F&M field activities as of mid-May 1983.

Date When Full Compliance Will be Achieved:

F&M will complete work associated with the referenced NCR by May 13, 1983.

2. Failure to Follow Procedures for Updating Red-Line Drawings for Safety-Related Instrumentation

Criterion V of 10 CFR 50, Appendix B, requires that activities affecting safety be accomplished in accordance with instructions, procedures, and drawings.

Mercury Procedure SP 677, Revision 5, "Procedure for Red-Lining Drawings," paragraph 6.1.5.1 requires that changes reflected in the red-lined drawing be incorporated in a new revision within 90 days of the first red-line and submitted to Ebasco Services, Inc. for approval.

Contrary to the above, during the period of February 8-10, 1983, the NRC inspector identified the following three Mercury Company drawings with red-line drawings that had gone considerably more than 90 days without a new revision incorporating the changes.

<u>Drawing Number</u>	<u>Red-Line (RL) Dates</u>
853-T-005A, Revision 3	RL-1 dated February 5, 1982
853-T-005A, Revision 3	RL-1 through 7 dated February 15, 1982 through March 22, 1982
853-T-008A, Revision 2	RL's dated February 6, 1982, through April 15, 1982

This is a Severity Level V Violation. (Supplement II.E) (382/8309-02)

The following response is submitted:

Corrective Actions Taken and Results Achieved:

The problems identified with the above drawings have been corrected and Red-Lined changes have been incorporated into the appropriate drawing revisions.

Corrective Action Taken to Preclude Recurrence:

Personnel involved with the update of drawings to incorporate red-lined as built were instructed in the use of Red-Line Drawing Procedure SP-667 Rev. 5. This training was completed on February 25, 1983.

Date When Full Compliance Will Be Achieved:

Personnel training was completed on February 25, 1983 and drawing corrective actions were completed and verified as of March 25, 1983.

Mr. G. L. Madsen

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Should you have any questions or need further information on this matter please do not hesitate to contact me.

Very truly yours,

L. V. Maurin

L. V. Maurin

by 792

LVM/WAC/pjl

cc: E. L. Blake, W. M. Stevenson, J. Wilson (USNRC)