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POWER & LIGHT

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April 20, 1982

G. D. McLENDON
Senior Vice President
W3K82-0240
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/Rpt. 82-03

Dear Mr. Madsen:



The following information regarding the violation cited by the USNRC inspectors in IE Inspection Report No. 50-382/Rpt. 82-03 dated March 18, 1982, is herewith submitted:

A. VIOLATION AS PRESENTED BY NRC

Criterion V of 10 CFR 50 Appendix B. states that activities affecting quality shall be prescribed by instructions, procedures or drawings of a type appropriate to the circumstances and that these activities shall be accomplished in accordance with these instructions, procedures or drawings.

Startup Administrative Procedure SAP-37, "Joint Test Group," (JTG) requires that the JTG review preoperational (Phase II) test procedures and that during these reviews the JTG will ensure the adequacy of designated technical reviews. Designated technical reviewers are required by SAP-11 to verify that the procedure content is consistent with the test objectives, regulatory requirements and commitments.

Contrary to the above, the NRC inspector observed during a procedure review that Preoperational Test Procedure SPO-59-001 was not consistent with these objectives, regulatory requirements or commitments. Several examples identified during the review conducted between August 31, 1981 to January 11, 1982 are listed below:

1. Section 14.2.12.2.48.3.H of the FSAR states that the Phase II test for containment spray will verify an unobstructed flow path, using water and air with overlapping flow paths. Contrary to this, Preoperational Test Procedure SPO-59-001, "Containment Spray," did not check flow-thru valve 2CS-F305A either with water or air. In addition, the valve line-up did not list several valves that are in the flow path or boundaries to the flow path.

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2. Section 14.2.4 of the FSAR requires that each procedure will include provisions to ensure that prerequisites are met.

Contrary to the above, this preoperational test procedure did not reference or list as prerequisites Containment Spray Flush Procedures, SFL-59-001 and SFL-59-002, or Prerequisite Testing Procedure SFG-59-001.

In addition, Paragraph 7.3.2 requires the testing of containment spray pump by pumping approximately 1740 gpm of water from the Refueling Water Storage Pool to the Reactor Coolant System; however, the status of the Reactor Coolant System is not addressed by the procedure.

3. Paragraph 6.2 of Quality Assurance Procedure QP 11.1, "Test Control," requires that written procedures for conducting tests shall be sufficiently detailed to enable qualified personnel to perform all required tasks.

Contrary to the above, the preoperational test procedure SPO-59-001 for containment spray does not identify the instruments and switches on the Engineering Safety Features Panel (CP-8) by the same identification number and/or description that they are labeled with on the panel. Specific examples are included in the details of this report.

B. LP&L RESPONSE

1. Corrective Steps which have been taken and the results achieved:

- A. The responsible Startup Engineer has revised SPO-59-001 to incorporate the NRC Inspector's comments as well as other changes required by the Startup Engineer's personal review. Included below are the NRC Inspector's comments and the Startup Engineer's resolutions to those comments.

1. NRC - Paragraph 6.0 Prerequisites
SFG-59-001, Containment Spray - Prerequisite Test
SFL-59-001, Containment Spray Flush
SFL-59-002, Containment Spray Flush
Why aren't these procedures listed as prerequisites?

Resolution - SFG-59-001, SFL-59-001, SFL-59-002 have been added to section 6.0, Prerequisites.

2. NRC - Paragraph 7.3.2.1.2 states to fill and vent system with approved procedure but does not identify the approved procedure.

Resolution - 7.3.2.1.2 now reads: Fill and vent the system using the Containment Spray System Operating Procedure (OP-9-001).

3. NRC - Labeling of instruments and switches on CP-8 does not use the same identification numbers/wording that the procedure uses, for example:

Paragraph 5.9 last sentence states: "The RWSP water level shall be maintained above a level of 10% as indicated by LI-SI-301 and 302 at CP-8." Instrument at CP-8 is not identified as LI-SI-301 or LI-SI-302.

Resolution - Either dropped alpha-numeric designation or included noun name of the appropriate indicators and controls.

4. NRC - Procedure does not check flow through 2CS-F305A either with water or air.
FSAR Section 14.3.12.2.48.3 Test Method.

H. Verify an unobstructed flow path using water and air with overlapping flow paths.

Resolution - Flow through 2CS-F305A and 2CS-F306B now verified by air in steps 7.3.4.1.4 and 7.3.4.2.4 of SPO-59-001.

5. NRC - Valve line up does not list numerous valves that are boundaries to the flow path or that are in the flow path. Examples "A" pump.

Valves in flow path

2SI-L103A

2SI-V627-1

2SI-V627-2

Not in flow path but instrument valves for detector FIC-307 which provides flow information.

Boundary Valves

2SI-E1587A

2SI-V1560-7

2SI-F808A

3SI-V629A

3SI-V320A/B

2SI-V801-B

2SI-V640-2

Boundary Valves

ISI-F1553 TK. 2A

ISI-F1554 TK. 2B

Resolution - Noted valves included in the valve lineup. An independent review of the procedure also checked the valve lineup and recommended additional expansion which was included in the lineup check list, attachment 8.1.1 of SPO-59-001.

6. NRC - Pumps being tested pumping 1800 GPM to Reactor Coolant System from RWSP, but status of RCS is not addressed!
How much water is in primary?
How is quantity of water in primary going to be monitored?

Resolution - Added step 7.2.1.4 which states: "The Reactor Coolant System is lined up to receive water during the pump full flow test and the Refueling Pool seal is installed.

The revised procedure has been submitted for JTG review which will be completed by April 14, 1982.

- B. The startup administrative procedures (SAP-13) on test execution requires the Startup Engineer to review the approved test procedure prior to use to incorporate possible design changes. This review would have corrected several of the noted deficiencies in the test procedure.
2. Corrective Steps Which Will Be Taken to Avoid Further Items of Noncompliance:
- A. The LSE will address a letter to Waterford Startup Group (WSG) members including all Startup Engineers stressing the importance of a thorough, accurate designated review of test procedures to ensure that the test program for Waterford SES #3 is both adequate and safe. The importance of the pre-performance test procedure review will also be discussed. The applicable portions of the startup administrative procedures will be referenced in the letter. This letter will serve as the basis for group training meetings on procedure review. Attendance will be documented. All Startup Engineers will be required to attend. This action will be completed by April 23, 1982.

- B. A special independent review group will be formed to review a sample of previously approved preoperational test procedures. The size of the sample will be approximately 10%. The review group will consist of engineers from the group of designated Shift Technical Advisors. The review group will independently develop their own work procedures and decide which procedures to review. At the end of the review process a report will be submitted to the Joint Test Group.

The scope of the review will include, but not limited to, the following:

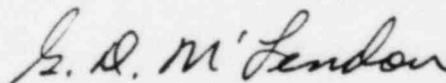
1. Adequacy of objectives and acceptance criteria.
2. Adequacy of test prerequisites and initial conditions.
3. Conformance of test procedure to regulatory guides and FSAR commitments.
4. Agreement between test objectives, acceptance criteria and test body.
5. Adequacy of valve and breaker lineups.
6. Adequacy of other procedure attachments.

This review will be completed and the results considered by the Joint Test Group by June 14, 1982.

3. Date When Full Compliance Will Be Achieved:

As noted above, corrective action will be completed by June 14, 1982.

Yours very truly,



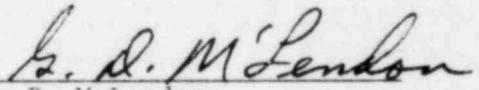
G. D. McLendon
Senior Vice President

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
)
Louisiana Power & Light Company) Docket No. 50-382
Waterford 3 Steam Electric Station)

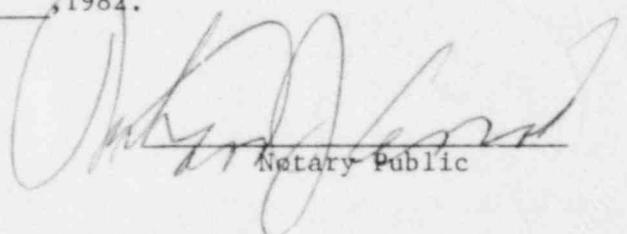
AFFIDAVIT

G. D. McLendon being duly sworn, hereby deposes and says that he is Senior Vice President of Louisiana Power & Light Company; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached response (W3K82-0240) to the Notice of Violation identified in NRC Inspection Report 82-03; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.


G. D. McLendon
Senior Vice President

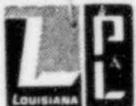
STATE OF LOUISIANA)
) ss
PARISH OF ORLEANS)

Subscribed and sworn to before me, a Notary Public in and for the Parish and State above named this 20th day of APRIL, 1982.


Notary Public

My Commission expires WITH LIFE

RETURN POSTAGE GUARANTEED



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UTILITIES SYSTEM

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