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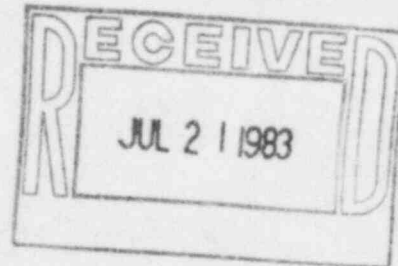
P.O. BOX 8008  
70174-8008

(504) 366-2345

July 19, 1983

W3P83-2274  
Q-3-A35.02.01  
Q-3-A20.27

Mr. G. L. Madsen, Chief  
Reactor Projects Branch 1, Region IV  
U.S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76012



SUBJECT: Waterford SES Unit 3  
USNRC Inspection Report 50-382/83-17

Dear Mr. Madsen:

In accordance with the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, the following information regarding the Notice of Violation identified in Inspection Report 50-382/83-17 dated June 6, 1983 is hereby submitted:

VIOLATION 1

1. "Failure to Provide Required Safety-Related Records in Accordance With Established Procedures"

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

- a. Ebasco Services, Inc. (Ebasco) Specification 860-75, "QA Requirements for Suppliers of Safety-Related Equipment and Services," paragraph 4.17, QA Records, states, in part, "Sufficient records shall be prepared as work is performed to furnish documentary evidence of the quality of items and of activities affecting quality . . . . The records shall include the results of reviews, inspections, tests, audits, monitoring of work performance . . . . Required records shall be identifiable and retrievable . . . ."

American Bridge Procedure 23, Revision B, October 4, 1979, "QA Documentation Turnover," paragraph 6.4.1, states, in part, "Implementation of this procedure shall be initiated in adequate time before completion of site activities to permit Ebasco's review and determination of acceptability of records . . . ."

Contrary to the above, Ebasco failed to provide complete QA records from American Bridge. Specifically, Ebasco failed to provide adequate QA documentation for the erection of structural steel for the missile protection over the east and west main steam isolation valves. (50-382/8317-01).

- b. ANSI N45.2.9-1974, paragraph 3.2.1, states that quality records shall be legible, completely filled out and adequately identifiable to the item involved.

ASP-IV-19, "Caring and Maintaining of Permanent Plant Items," Revision L, February 17, 1983, paragraph 6.4.3, states, in part, that record cards shall have as a maintenance identification number, the CMI number to which the item described refers. For CMI's with more than one item, an alphabetical suffix shall be added when deemed necessary by the equipment maintenance supervisor for ease of maintenance documentation.

Contrary to the above, maintenance and storage records were not identifiable for the core shroud assembly, core support barrel and guide tube assemblies. (50-382/8317-02)

This is a Severity Level V Violation. (Supplement II.E)"

#### RESPONSE

The following response is provided for Violation 1.a

#### Corrective Action Taken and Results Achieved:

NCR-W3-4374 was written to document and track discrepancies associated with the installation of the structural steel platforms over the east and west main steam isolation valves. The tracking and closure of NCR-W3-4374 was completed on July 1, 1983, and documentation is available for review.

#### Corrective Steps Which Will Be Taken to Avoid Further Violations:

Ebasco Force Account personnel who are responsible for performing this type of activity will be reinstructed to the requirements of CP-717 and CP-793.

#### The Date When Full Compliance Will Be Achieved:

Full compliance will be achieved by July 19, 1983.

The following response is provided for Violation 1.b

Corrective Action Taken and Results Achieved:

Care and Maintenance Instruction (CMI) 186 material description is "Reactor Vessel Internals". Items contained within this CMI are listed individually on NY P.O. #403402 Sub-P.O. #CE9032282 and #CE9430832. When an alphabetical suffix is added to the CMI number, it is done to help identify and separate similar items from each other. In the case of the core shroud assembly, core support barrel, and guide tube assemblies, the items were not similar and the identities were labeled on each packing crate. At the time of receipt, the Equipment Maintenance Supervisor determined that these items were clearly identifiable and deemed it unnecessary to add an alphabetical suffix to the CMI number.

The subject reactor vessel internals are presently installed at Waterford 3. The Ebasco CMI applicable to these components has been closed and is filed in the Q.A. vault. No further corrective action is required.

Corrective Steps Which Will Be Taken to Avoid Further Violation

Ebasco Force Account personnel who are responsible for implementation of the CMI program have been instructed by letter W3QA-25449 dated June 27, 1983, to identify individual items inspected under CMI to assure component traceability. New personnel will be instructed to requirements of ASP-IV-19 to assure that individual component traceability is maintained on all future equipment requiring care and maintenance under the CMI program.

The Date When Full Compliance Will Be Achieved:

Full compliance was achieved on July 7, 1983.

VIOLATION 2

2. "Failure to Establish Adequate Document Control Measures

10 CFR 50, Appendix B, Criterion VI requires that measures be established to control the issuance of documents.

ANSI N45.2, paragraph 7, "Document Control," requires that procedures be established for the control of documents and changes thereto to preclude the possibility of use of outdated or inappropriate documents.

Contrary to the above, the licensee's document control measures did not prevent the issuance of "Certified As-Built" prints (CE Reactor Trip Switchgear Control Wiring Prints 1564-3905 through 1564-3919 (R3)) that failed to include FCR-1C-63. (50-382/8317-03)

This is a Severity Level V Violation. (Supplement II.E.)"

## RESPONSE

The following response is provided for Violation 2

### Corrective Action Taken and Results Achieved:

FCR-IC-63 has been posted against Emdrac Drawing 1564-3905, 1564-3906, 1564-3907, 1564-3908, 1564-3909, 1564-3910, 1564-3911, 1564-3912 and 1564-3913. Emdrac Drawing 1564-3914 thru 1564-3919 were not affected by the above finding. FCR-IC-63 was posted on June 8, 1983.

Ebasco New York Office has advised project personnel involved in the review of Emdrac drawings of the potential for errors caused by vendors not incorporating forced revisions. Reinstruction of Ebasco New York cognizant engineers was completed on July 12, 1983.

### Corrective Steps Which Will Be Taken To Avoid Further Violations:

In order to determine if the subject NRC finding is an isolated case, Ebasco New York will review three (3) Vendor Drawings selected from each safety related purchase order. These drawings will be selected randomly from those drawings which have superseded Ebasco Forced Revisions. The review will involve the assurance that comments made on the Ebasco Forced Revision has been properly incorporated. If one (1) drawing is determined not to be in compliance with the above, the sample will be doubled for that purchase order. If one (1) additional rejection occurs, a re-evaluation of the sample for that purchase order will be performed.

### Date When Full Compliance Will Be Achieved:

The completion date for the first sample is September 1, 1983.

## VIOLATION 3

### 3. "Failure to Follow Document Control Procedures

10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality shall be accomplished in accordance with approved procedures.

- a. Ebasco Procedure, ASP-III-2, "Site Document Control," paragraph 6.4.2.4, requires holders of uncontrolled documents to clearly mark each document as "void," or "information only," or to destroy the document.

Contrary to the above, Revision 6 (that had been superseded by Revision 7) of Print 1564-G-868 was found in the print file of Station 10, construction engineering-mechanical, not properly marked "void" or "information only." (50-382/8317-04)



- b. ASP-III-2, "Site Document Control," paragraph 6.4.2.1, requires the verification of transmitted documents against the transmittal documents for document control.

Contrary to the above, three instruction manuals in custody of document control, KVS-16.2, for the emergency diesel generators were not updated with DCN-E-1037, as required. The design change notice, page 1, indicated that the change applied to a "print." (50-382/8317-05)

- c. ASP-III-2, "Site Document Control," paragraph 6.4.1, requires that holders of documents distributed by document control are responsible for proper receipt, control, and protection of the documents.

Contrary to the above:

- (1) Ebasco Specification 2564.482 (R6), a controlled document assigned to the construction engineer-mechanical, could not be obtained from the files.
- (2) Instruction Manual KVS-16.2, "Emergency Diesel generators," was not in custody of the Ebasco office engineer, as indicated on the document control card. (50-382/8317-06)

This is a Severity Level V Violation. (Supplement II.E)

#### RESPONSE

The following response is provided for Violation 3a:

#### Corrective Action Taken and Results Achieved:

Document Control performed an audit of Control #10 on June 10, 1983. Discrepancies identified as a result of this audit are being corrected.

Drawing 1564-G-868 has been properly marked.

#### Corrective Steps Which Will Be Taken To Avoid Further Violations:

Mechanical Engineering personnel that are responsible for all documents under Control #10 have been reinstructed to the requirements of ASP-III-2. Reinstruction was complete on July 11, 1983.

#### Date When Full Compliance Will Be Achieved:

The corrective action on the discrepancies identified in the above audit will be complete by August 1, 1983.

The following response is provided for Violation 3b:

Corrective Action Taken and Results Achieved:

The three instruction manuals have been updated to include DCN-E-1037. A complete review of 1564 and 5817 Emdrac numbers was performed and no other discrepancies were noted.

Corrective Steps Which Will Be Taken To Avoid Further Violations:

Document Control clerks have been reinstructed to assure that they check every entry of FCR/DCN's to assure that the applicable documents are correctly identified and are correctly posted.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on June 22, 1983.

The following response is provided for Violation 3c:

Corrective Action Taken and Results Achieved:

- (1) Control number 10 has been removed from distribution for Spec 2564.482 Rev. 6 as this spec is related to backfill and is not needed by this department.

The Mechanical Engineering Department has performed a complete review of their requirements to have controlled copies of specifications. They have determined that specifications, if needed, would only require an "Information Only" copy.

- (2) Office Engineering Control Number 1 has been removed from distribution for Instruction Manual 1564-9161 KVS-16.2.

Corrective Steps Which Will Be Taken To Avoid Further Violations:

- (1) Controlled copies of specifications have been removed from the Mechanical Engineering Department by Document Control. Some controlled drawings are maintained by Mechanical Engineering. These drawings were issued through Document Control in accordance with ASP-III-2.
- (2) Office Engineering has been removed from distribution for all vendor manuals by Document Control.

Date When Full Compliance Will Be Achieved:

- (1) Full compliance was achieved on May 3, 1983
- (2) Full compliance was achieved on July 6, 1983

If further information is required for this matter, please do not hesitate to contact me.

Yours very truly,

*Thomas F. Gervita for*

F. J. Drummond

Project Support Manager - Nuclear

FJD/WAC/pjl

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