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February 16, 1984

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Director of Nuclear Reactor Regulation
Attention: Mr. G.W. Knighton
Licensing Branch No. 3
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: Waterford 3 SES
Docket No. 50-382
Licensee Qualification

Dear Mr. Knighton:

In Section 13 of SSER 5, the NRC noted certain items which must be addressed to close-out the issue of licensee qualifications. Attachment 1 to this letter provides our response to these items. If you have any questions regarding our response, please feel free to call our Bob Foley at (504) 363-8937.

Very truly yours,

K. W. Cook
Nuclear Support & Licensing Manager

KWC/RMF/ch
Attachment

cc: E.L. Blake, W.M. Stevenson, J. Wilson, G.L. Constable, R. Benedict

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ATTACHMENT 1

RESPONSE TO SER LICENSEE QUALIFICATION ITEMS

1. In accordance with 10 CFR Appendix R, regular planned meetings shall be held at least every three months for all brigade members to review changes in the fire protection program.
2. SRP 13.2.2, paragraph II.6 (Fire Protection) recommends that "all [station] employees should participate in an annual evacuation drill". It is LP&L's position that the drills already required at Waterford 3 (discussed below) meet the spirit of this recommendation. Furthermore, it is our belief that an annual evacuation of all employees would effectively decrease overall safety by causing an unnecessary disruption in plant operations without an equivalent compensating increase in assurance of satisfactory emergency response. The applicable drills which are conducted by LP&L are discussed below.

In addition to LP&L's commitment to perform all fire drills required by 10 CFR 50 Appendix R, a major annual exercise simulating a Site or General Emergency shall be held. This exercise shall include mobilization of state, local, and site personnel and resources sufficient to demonstrate the capability to respond to an accident scenario requiring response. The scenario shall be varied from year to year such that all major elements of the plans and preparedness organizations are tested within a five year period. All station personnel do receive annual general employee training, which includes discussion of emergency evacuation procedures. The Waterford 3 Fire Team is activated during the annual drills and reports to stations specified by the Emergency Coordinator.

The Waterford 3 Emergency Plan, which documents our commitment to perform these annual exercises, has been reviewed by the NRC and the Federal Emergency Management Agency (FEMA). Although their total review has not been completed, the frequency of drills is not at issue.

In conclusion, we believe that the controls already in place at Waterford 3 provide adequate assurance of emergency response to fire-related or other unusual events.

3. STAs and operating personnel from the Plant Manager through the operations chain to the licensed operators shall receive the training indicated in FSAR Section 13.2.2.4. The Plant Manager and the Assistant Plant Manager-Operations & Maintenance, both of whom have previously held SRO licenses, shall complete this training prior to 5% power. In addition, managers and technicians in the I&C, health physics, and chemistry departments shall receive training commensurate with their post-accident responsibilities.

4. In accordance with NUREG-0737 Appendix C, INPO GPG-01R1 (Nuclear Power Plant STAs), and SRP 13.2.2 paragraph II.6.C, persons not actively performing STA functions for a period of 30 days or longer shall, prior to resuming STA activities, review the control room log to ensure he is cognizant of facility/procedural changes that occurred during his absence. Furthermore, persons not performing STA functions for a period of four months or longer shall be recertified by test prior to resuming STA activities.