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June 18, 1984

Mr. Gary L. Groesch
2257 Bayou Road
New Orleans, LA 70119

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

Dear Mr. Groesch:

The enclosed documents were identified during a review of correspondence in this proceeding as being related to emergency planning and preparedness at Waterford Unit 3. They are being provided herewith pursuant to the Licensing Board's Memorandum and Order of October 18, 1982.

Sincerely,

Sherwin E. Turk
Counsel for NRC Staff

Enclosures: As stated

cc w/encl.: Service List

DESIGNATED ORIGINAL

Certified By Mbl D807

OFC	OELD SGT	OELD					
NAME	SETurk:as	SATreby					
DATE	06/15/84	06/18/84					

3-29-84

In Reply Refer To:
Docket: 50-382/84-02

Louisiana Power & Light Company
ATTN: R. S. Leddick, Sr. Vice
President-Nuclear Operations
142 Delaronde Street
New Orleans, Louisiana 70174

Gentlemen:

SUBJECT: EMERGENCY PREPAREDNESS FOLLOWUP APPRAISAL

To verify the adequate state of onsite emergency preparedness at Waterford 3 prior to the determination for issuance of an operating license, Region IV conducted a followup appraisal of your emergency preparedness program. The objectives of the followup appraisal were to evaluate the overall adequacy and effectiveness of emergency preparedness and to identify areas of weakness that need to be strengthened. The NRC will use the findings from this followup appraisal as a basis for making a decision on the ade acy of your emergency preparedness program at Waterford 3.

During the period January 30 through February 10, 1984, the NRC conducted a followup appraisal of the emergency preparedness program at the Waterford 3 Steam Electric Station. Areas examined during this appraisal are described in the enclosed report (50-382/84-02). Within these areas the appraisal team reviewed selected procedures and representative records, inspected emergency facilities and equipment, and interviewed personnel.

The findings of this emergency preparedness followup appraisal indicate that certain deficiencies exist in your emergency preparedness program. These are addressed in Appendix A, "Significant Preparedness Deficiencies." You are requested to provide this regional office with a schedule for completing these deficiencies within 30 days after receipt of this letter.

Further review of this emergency preparedness followup appraisal indicates that there are other areas that should be evaluated and considered for improvement in your emergency preparedness program. These areas are discussed in Appendix B, "Preparedness Improvement Items."

This is to inform you that the areas identified in the findings of Appendix A must be adequately addressed prior to issuance of an operating license. Each item addressed shall be cross-referenced to your plan and/or implementing procedures.

In conjunction with the aforementioned followup appraisal, emergency plans for your facility (including Revision 6) were reviewed by the followup appraisal team. The results of this review, discussed in the attachment to the enclosed report, indicate that certain areas of your emergency plan require clarification. Copies of these changes are to be submitted in accordance with the procedure delineated in 10 CFR 50.54(b). Your corrective actions, addressing each of the items identified in the attachment to the enclosed report, are to be incorporated into the emergency plan and procedures as appropriate. Your response to these items should be cross-referenced to their location in your plan.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosures will be placed in the NRC Public Document Room unless you notify this office, by telephone, within 10 days of the date of this letter, and submit written application to withhold information contained therein within 30 days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1).

The response directed by this letter is not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Should you have any questions concerning this appraisal, we will be pleased to discuss them with you.

Sincerely,

Original Signed By
E. H. Johnson

E. H. Johnson, Chief
Reactor Project Branch 1

Enclosures:
1. Appendix A - Significant Preparedness Deficiencies
2. Appendix B - Preparedness Improvement Items
3. Appendix C - NRC Inspection Report 50-382/84-02

cc w/enclosures:
Louisiana Power & Light Company
ATTN: F. J. Drummond, Nuclear Services Manager
142 Uelaronde Street
New Orleans, LA 70174

Louisiana Power & Light Company
ATTN: R. P. Barkhurst, Plant Manager-Nuclear
P.O. Box B
Killona, LA 70066

Mr. R. T. Lally
Middle South Services
P.O. Box 61000
New Orleans, LA 70161

Louisiana Power & Light Company
ATTN: T. F. Gerrets, QA Manager
142 Delaronde Street
New Orleans, LA 70174

APPENDIX A

SIGNIFICANT PREPAREDNESS DEFICIENCIES

The results of the NRC's followup appraisal of the emergency preparedness program for the Waterford 3 Steam Electric Station identified a number of significant deficiencies which were discussed with you and your staff during the exit meeting on February 10, 1984.

Ten areas are identified which continue to have significant deficiencies, and the areas are presented below along with specific findings number(s) from the appraisal report which are covered by each significant deficiency area in this report.

1. Onsite Emergency Organization

   382/8402-01

2. Personnel Accountability

   382/8308-99

3. Corporate and Site Emergency Plan and Procedures

   382/8308-131

4. Communications

   382/8308-62 (prior to exceeding 5% power)
   382/8308-97

5. Meteorology

   382/8308-53

6. Training

   382/8308-09
   382/8308-10
   382/8308-118
   382/8402-02

7. Public Information and Notification

   382/8308-114
   382/8308-115
   382/8308-116

8. Offsite Laboratories

   382/8308-32

9. Nonradiation Process Monitors

382/8308-49
382/8308-50

10. Drills, Exercises, and Walk-Throughs

382/8308-120

APPENDIX B

PREPAREDNESS IMPROVEMENT ITEMS

Based on the results of the NRC's followup appraisal of the Waterford 3 Steam Electric Station conducted January 30 - February 10, 1984, the following items should be considered for improvement:

-- (Open) Open Item (382/8308-38): Make provisions and include arrangements for availability of additional telephone service.

-- (Open) Open Item (382/8308-39): The NRC inspector compared emergency kit and locker (interim emergency operations facility, operations support center, field team) inventories with procedure inventories (EP-3-040, Revision 3). Several items were observed missing (clipboards, radios, etc.). In addition, several instruments (Ludlum 177 in interim EOF health physics locker and Ludlum 2218 in field kits) were present in the area, but were not located in the kits. The applicant agreed to upgrade EP-3-040 to account for these instruments being stored outside the emergency kits. EP-3-040 should be upgraded to include many essential items (e.g., self-reading dosimeter charger) stored in the interim emergency operations facility emergency locker, but not listed in the procedure inventory.

-- (Open) Open Item (382/8308-42): The NRC inspector observed emergency lockers with padlocks. This does not necessarily aid in controlling emergency kit inventories and could prevent timely access to the kits in an emergency.

-- (Open) Open Item (382/8308-46): Contrary to the applicant's response, the applicant had not added a self-reading dosimeter charger to the hospital inventory list (EP-3-040, Revision 3, "Emergency Equipment Inventory"). The hospital emergency locker was not inspected to determine if a self-reading dosimeter charger had been placed in the locker.

-- (Open) Open Item (382/8308-55): The procedures for the scheduling of inspection and recording systems had not been adequately documented. Procedure MI-4-299 did not state the scheduling of instrumentation electronic checks. A new procedure was being implemented for daily inspection of the tower by station operations personnel; however, the procedure had not been approved by the applicant's management.

-- (Open) Open Item (382/8308-107): The NRC inspector reviewed EP-3-020 line 5.4.2 and it did not reference the exercise reports that should be sent to the senior vice president-nuclear operations; however, the NRC inspector did locate the line referencing the exercise reports. The procedure should state that the senior vice president-nuclear operations will receive exercise reports.

-- (Open) Open Item (382/8402-03): Finalize the lesson plans for training offsite personnel.

-- (Open) Open Item (382/8402-04): The training lesson plan for dose assessment should be revised to include the use of the nomogram prescribed in Attachment 7.1 to EP-2-050.

-- (Open) Open Item (382/8402-05): The hierarchy for the selection of meteorological data for dose projections should be included in EP-2-050.

-- (Open) Open Item (382/8402-06): The same units for specifying meteorological tower heights should be used in both the procedures and control room displays to minimize operator confusion.

-- (Open) Open Item (392/8402-07): Additional walk-throughs with control room personnel (shift supervisors, control room supervisors, and shift technical advisors) should be performed in order to improve the proficiency in determining protective action recommendations using Procedures EP-2-050, EP-2-051, and EO-2-052.

The following open items have been transferred to the Facilities Radiation Protection Section:

(Open) Open Item (382/8308-22)
(Open) Open Item (382/8308-23)
(Open) Open Item (382/8308-24)
(Open) Open Item (382/8308-25)
(Open) Open Item (382/8308-26)
(Open) Open Item (382/8308-27)
(Open) Open Item (382/8308-28)
(Open) Open Item (382/8308-29)
(Open) Open Item (382/8308-30)
(Open) Open Item (382/8308-31)
(Open) Open Item (382/8308-47)
(Open) Open Item (382/8308-85)
(Open) Open Item (382/8308-86)
(Open) Open Item (382/8308-87)
(Open) Open Item (382/8308-88)
(Open) Open Item (382/8308-89)
(Open) Open Item (382/8308-90)
(Open) Open Item (382/8308-91)
(Open) Open Item (382/8308-92)
(Open) Open Item (382/8308-93)

APPENDIX C

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-382/84-02

Docket: 50-382 Construction Permit: CPPR-103

Applicant: Louisiana Power and Light Company (LP&L)
142 Delaronde Street
New Orleans, Louisiana 70174

Facility Name: Waterford 3

Appraisal At: Waterford 3 site near Killona, Louisiana

Appraisal Conducted: January 30 - February 10, 1984

Inspectors:

Charles G. Hackney — 3-23-84
C. A. Hackney, NRC (Team Leader) Date

Charles G. Hackney for — 3-23-84
D. J. Perrotti, NRC Date

Clyde E. Wisner — 3-23-84
C. E. Wisner, NRC Date

Charles G. Hackney for — 3-23-84
E. Markee, NRC Date

Charles G. Hackney for — 3-23-84
D. P. Higby, Battelle Pacific Northwest Laboratories Date

Charles G. Hackney for — 3-23-84
M. H. Malmros, Comex Corporation Date

Charles G. Hackney for — 3-23-84
W. N. Herrington, Battelle Pacific Northwest Laboratories Date

Charles G. Harbney — 3-23-84
P. Brown, Comex Corporation — Date

Charles G. Harbney — 3-23-84
K. Loposor, Comex Corporation — Date

Approved: J. B. Baird — 3/23/84
J. B. Baird, Chief, Emergency Response and Preparedness Staff — Date

For T. H. Johnson — 3/28/84
W. A. Crossman, Chief, Reactor Project Section B — Date

Appraisal Summary

Followup Appraisal Conducted January 30 - February 10, 1984 (Report 50-382/84-02)

Areas Inspected: The special, announced followup appraisal involved 421 inspector-hours onsite and offsite in th performance of an emergency preparedness implementation followup appraisal including administration, emergency organization; training; emergency facilities and equipment; emergency implementing procedures; coordination with offsite groups; and drills, exercises, and walk-throughs.

Results: In the areas inspected, no violations or deviations were identified. Seventeen significant deficiencies were identified as requiring corrective action. Further, 11 improvement items were identified for the applicant's consideration for improving the emergency preparedness program.

INTRODUCTION

The purpose of this followup appraisal was to perform a comprehensive evaluation of the applicant's emergency preparedness program. This followup appraisal included an evaluation of the adequacy and effectiveness of areas for which explicit regulatory requirements may not currently exist. The followup appraisal effort was directed towards evaluating the applicant's capability and performance rather than the identification of specific items of noncompliance.

The followup appraisal scope and findings were summarized on February 10, 1984, with those persons indicated in Section 9.0 of this report. See Section 8.0 of this report for details of the exit meeting.

SUMMARY

The NRC inspectors reviewed the applicant's emergency plan (the Plan) and emergency plan implementing procedures (EPIPs) and conducted interviews with station and offsite personnel. The purpose of this inspection was to determine the adequacy of the applicant's emergency response capabilities. There were seven major function area inspected: administration; emergency organization; training; emergency facilities and equipment; emergency implementing procedures; coordination with offsite groups; and drills, exercises, and walk-throughs.

Administration

Since the emergency preparedness implementation appraisal (EPIA) conducted in March 1983, the applicant established the senior vice president-nuclear operations as the individual having the overall authority and responsibility for emergency planning at Waterford 3. The applicant has specified that the emergency planning manager-nuclear with the Nuclear Services Department is delegated the responsibility and authority to ensure that the overall requirements of emergency response are achieved and maintained. Further, there are other personnel assigned to the emergency preparedness organization; however, the plan does not fully describe the above emergency planning organization.

Emergency Organization

The emergency organization has had major organizational changes since the March 1983 appraisal. There had been an additional three emergency operations facility (EOF) directors added to the primary EOF director's list. Further, there have been a multi-tier emergency organization (A, B, C) with each team serving for 1 week.

The applicant had identified down to the working level those persons responsible for responding to an emergency at the Waterford 3 site.

The NRC inspectors determined that there still exists a conflict as to the transfer of authorities from the emergency coordinator to the EOF director.

Training

The NRC inspectors noted that a formalized training program had been initiated for onsite and offsite personnel; however, the offsite training program had not been completed. Of the eight lesson plans for offsite personnel, two had been written and not reviewed. The remaining offsite lesson plans had not been written.

The current emergency director and emergency coordinator course did not have sufficient in-depth training on protective action recommendations required for the emergency coordinator/EOF director (EC/D) position.

Emergency Facilities and Equipment

The NRC inspectors noted that the emergency response facilities had been completed with the exception of the EOF. Presently the applicant is using the interim EOF which is located onsite and does not meet the criteria in NUREG-0737. The NRC inspectors noted that the technical support center (TSC) was located in the control room envelope and had the same habitability as the control room. The TSC had one central room as the TSC control center and several other rooms located in the general vicinity for support groups; e.g., dose assessment and engineering.

The operational support center (OSC) appeared to have had sufficient space and communication equipment for response personnel.

There appeared to be sufficient instrumentation and equipment onsite for the applicant's emergency response organization.

Emergency Implementing Procedures

The NRC inspectors noted that since the March 1983 appraisal, a number of new procedures had been issued and several existing procedures revised to address appraisal findings. Some procedure problems still existed in the areas of dose assessment, site personnel notification and accountability, and management review of exercise reports.

Coordination With Offsite Groups

The applicant appeared to have a good working relationship with the state and parishes. There appeared to be no problems associated with communicating between the applicant and the offsite agencies. There had been several drills prior to this inspection in which the state and parishes participated. It was noted that the applicant had not completed the lesson plans for offsite training.

Drills, Exercises, and Walk-Throughs

The NRC inspectors noted that a program of drills and exercises had been implemented under the cognizance of the emergency planning coordinator. Improvement items identified during the drills had been reviewed and incorporated in the applicant's procedures. Inspector walk-through observations identified a need for additional proficiency in the use of protective action decisionmaking procedures and demonstration of the use of radiation monitoring systems when operational status is achieved.

Conclusion

The applicant had made significant improvement in their emergency preparedness program since the March 1983 EPIA.

The applicant had addressed the major emergency response functions; however, there were seventeen significant deficiencies which must be addressed.

1.0 ADMINISTRATION

1.1 - 1.4 Responsibility Assigned, Authority, Coordination, Selection, and Qualification

The administration of the applicant's emergency preparedness program was reviewed with respect to the requirements of 10 CFR 50.47(b)(1) and (16); 10 CFR 50, Appendix E, paragraph IV.A; and the criteria contained in NUREG-0654, Sections II.A and P. NUREG-0654 has been endorsed by Regulatory Guide 1.101, Revision 2.

From discussions with LP&L representatives and a review of Revision 6 of the Plan, dated January 30, 1984, the NRC inspector determined that a new emergency planning group had been established. Since the EPIA conducted in March 1983, Nuclear Operations Executive Directive ED-011, dated December 1, 1983, established the senior vice president-nuclear operations as the individual having the overall authority and responsibility for emergency planning at Waterford 3. This directive also specified that the emergency planning manager-nuclear with the Nuclear Services Department is delegated the responsibility and authority to ensure that the overall requirements of emergency response are achieved and maintained. LP&L General Office Organization Chart No. G10b3, September 29, 1983, and Memorandum W3F83-0433, November 21, 1983, further delineate the emergency planning group. An onsite emergency planning coordinator (EPC), whose normal duty station is the plant site, had been delegated authority and responsibility for coordinating onsite planning efforts including plans, procedures, training, facilities, drills, and exercises. An offsite EPC had been delegated authority and responsibility for coordinating offsite emergency planning efforts including coordination with parish and state agencies, corporate command center, LP&L information center, alert and notification system, offsite emergency planning information, offsite training, and offsite drills and exercises. The emergency planning group also included a member responsible for onsite facilities and equipment and an administrative clerk typist. However, Section 8 of the Plan, does not fully describe the above emergency planning organization. The applicant has agreed to provide a description of the EPC's duties and responsibilities in the Plan. The Plan is further addressed in Attachment 1 to this report.

As part of the Nuclear Services Department, the emergency planning group does not fall within the Waterford 3 plant organizational structure. However, from a review of Memorandum W3A83-0221, September 21, 1983 (which established the plant technical services group as the plant's liaison with the emergency planning organization) and from discussion with the assistant plant manager-plant technical services, the NRC inspector verified that this liaison existed between the onsite EPC and the assistant plant manager-plant technical services. The assistant plant manager-plant technical services is the chairman of the plant operating review committee (PORC), and as such, provided an interface between the emergency planning group and the PORC. This arrangement which was endorsed by the plant manager (memo from R. P. Barkhurst to distribution, February 3, 1984), appeared to be working satisfactorily at the time.

(Closed) Open Items (382/8308-01 and 382/8308-02): The emergency planning manager-nuclear reports to the nuclear services manager who is the same level of management as the Waterford plant manager. The Waterford plant manager and the nuclear services manager both report to the senior vice president-nuclear operations. The onsite EPC maintains liaison with the assistant plant manager-plant technical services, who is the chairman of the PORC. From discussions with LP&L representatives and a review of documentation, as discussed above, the emergency planning manager-nuclear appeared to have authority necessary to coordinate the emergency planning responsibilities assigned including interface with the PORC. The applicant's response appeared to be adequate.

2.0 EMERGENCY ORGANIZATION

2.1 - 2.2 Onsite and Augmentation Organizations

The onsite and augmentation organizations were reviewed with respect to the requirements of 10 CFR 50.47(b)(1) and (2); 10 CFR 50, Appendix E, paragraph IV.A; and criteria in NUREG-0654, Sections II.A and B.

From a review of Section 5.0 of the Plan and discussions with LP&L representatives, the NRC inspector determined that major organizational changes had occurred in the onsite and near-site emergency organizations since the EPIA conducted in March 1983. For example, the EOF directors (primary and alternate) have been replaced by three duty EOF directors who serve on-call for 1 week at a time. These three persons are newly assigned EOF directors. In addition, the near-site organization (EOF) had been developed into a similar three-deep organization (Teams A, B, and C) with each team on-call for 1 week at a time. EPIP EP-3-050, "Emergency Organization Documentation and Control," Revision 2, January 11, 1984, provided administrative control for the Emergency Management Resources Book which included the duty roster for the onsite and near-site emergency organizations. EP-3-050 specified that the Emergency Management Resources Book would be updated on a monthly basis.

During this EPIA followup, the NRC inspector continued discussions of the roles of, and interfaces between, the onsite and near-site emergency organizations with key members of these organizations. The NRC inspector interviewed 14 key members of the emergency organizations who had not previously been interviewed. With the exception of chemistry technicians, the interviews indicated that these members of the emergency organizations had completed their initial emergency preparedness training and had an understanding of the general functional areas in which they would be expected to perform. The training of chemistry technicians is addressed in Section 3 of this report.

(Closed) Open Item (382/8308-03): Emergency team assignments are delineated in EP-2-130, Revision 3, January 11, 1984. This procedure established the responsibilities, duties, and necessary assignments to form emergency teams. Attachment 7.1 of EP-2-130 is a matrix of the emergency teams showing staffing levels and qualifications down to the working level. EP-3-050 provided control over the content and updating of the Emergency Management Resources Book which included the duty roster for the onsite and near-site emergency organizations. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-04): Certain portions of the Plan had not been revised to clearly indicate the transfer of authority and responsibility for notifying offsite authorities and making protective action recommendations; e.g., Section 5.1.2.2.a of the Plan indicated that the emergency coordinator may transfer these responsibilities to the EOF director. Since this matter pertains to the Plan, Open Item 382/8308-04 is hereby closed, and further discussion of this matter is included in Attachment 1 to this report.

(Closed) Open Item (382/8308-05): Section 7.2 of the Plan described the EOF as the coordination point for radiological and environmental assessment and as the central point for the receipt and analysis of sample media from the state and utility monitoring teams. Section 6.2.2.6.f of the Plan needs revision in order to be consistent with Section 7.2 with regard to coordination of field monitoring data. The applicant agreed to make this minor change to the Plan. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-06): On January 30, 1984, the applicant submitted the procedures that will be used by the corporate command center in its support of the Waterford facility emergency organizations. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-07): Table 5-1 of the Plan had been revised regarding the augmentation capability for supporting the onshift organization. Revision 6 to the Plan provided a total number of personnel that conforms to the recommended guidance criteria of Table B-1 of NUREG-0654. However, certain functions expressed in Table B-1 were not covered by Table 5-1 of the Plan: one communicator onshift; one health physics technician at 30 minutes for inplant surveys; one plant systems engineer for core-thermal hydraulics at 30 minutes; and four health physics technicians (two at 30 minutes and two at 60 minutes) for inplant protective actions. The NRC inspector was informed that the extra Nuclear Auxiliary Operator (NAO) would perform onshift communications. Table 5-4 of the Plan reflects this; however, Table 5-1 of the Plan should be revised to be consistent with NUREG-0654 and Table 5-4 of the Plan. The matter of Table 5-1 augmentation capability is a planning item and is addressed in Attachment 1 to this report. This item is redesignated as Open Item 382/8402-01 below.

The following deficiency must be corrected in order to achieve an acceptable program:

(Open) Open Item (382/8402-01): Table 5-1 of the Plan had been revised regarding the augmentation capability for supporting the onshift organization. Revision 6 to the Plan provided a total number of personnel that conforms to the recommended guidance criteria of Table B-1 of NUREG-0654. However, certain functions expressed in Table B-1 were not covered by Table 5-1 of the Plan: one communicator onshift; one health physics technician at 30 minutes for inplant surveys; one plant systems engineer for core-thermal hydraulics at 30 minutes; and four health physics technicians (two at 30 minutes and two at 60 minutes) for inplant protective actions. The NRC inspector was informed that the extra NAO would perform onshift communications. Table 5-4 of the Plan reflected this; however, Table 5-1 of the Plan should be revisied to be consistent with NUREG-0654 and Table 5-4 of the Plan.

3.0 TRAINING

3.1 Program Establishment

The area of training was reviewed with respect to the requirements of 10 CFR 50.47(b)(15) and (16); 10 CFR 50, Appendix E, paragraph IV.F; and the criteria in NUREG-0654, Sections II.G and II.O.

A training program for onsite and offsite emergency response personnel had been established. Administrative Procedure UNT-3-009, Revision 0, "Emergency Plan Training," January 6, 1984, generally described the training for station, corporate, and appropriate offsite agency emergency response personnel. UNT-3-009 had superseded Procedures EP-3-010, PMD-TR-003, PMD-TR-19 and PMD-TR-20 which previously described and provided instruction for the implementation of the overall emergency plan training program. According to UNT-3-009 retraining will be conducted on an annual basis every 12 ±3 months. With one exception, as explained below, the training department manual provided a listing of each specialized training course to be completed by essential personnel. From a sampling of lesson plans, the NRC inspector determined that approved lesson plans had been developed for each emergency plan training course listed in the training department manual. The courses utilized a written quiz as a check on training effectiveness and student comprehension. The NRC inspector reviewed selected quizzes. UNT-3-021, "Training Materials Development/Update/Control," January 9, 1984, provided instructions for updating training materials (e.g., lesson plans) with regard to revising the Plan or EPIPs. UNT-3-011 covered instructor certification. The NRC inspector reviewed the instructor certification documentation for the instructors who are currently teaching emergency planning courses. The NRC inspector reviewed the organization charts (approved October 13, 1983) which described the plant training department under the supervision of the training manager-nuclear. It appeared that all instructor slots, except one in general training, had been filled. UNT-3-002, "Training Records and Forms," described the establishment and maintenance of training records. UNT-3-009, along with UNT-3-002, provided for documentation of reading assignments initially and when revisions (i.e., the Plan or EPIPs) occur.

Of the eight lesson plans designated for training offsite personnel, two had been written but were not yet reviewed or approved in accordance with training department procedures. The remaining six lesson plans had not been prepared. UNT-3-009 identified essential personnel as those personnel who are assigned and trained to perform emergency duties as outlined within the Plan. According to the Plan, chemistry personnel are assigned to perform various emergency functions (e.g., first aid, search and rescue, emergency repair/operations and backup support for radiation monitoring) and as such are essential emergency team personnel. In addition, chemistry technicians are responsible for operation of the post-accident sampling system (PASS) in obtaining reactor coolant and containment air samples during an emergency situation. Chemistry personnel were included in the training department manual emergency plan

training matrix; however, the matrix did include a training course on the PASS. EP-2-091, "Emergency Chemistry," Revision 2, January 11, 1984, generally covers operation of the PASS and references several chemistry procedures related to operation of the PASS. As discussed in Sections 4.1.1.5 through 4.1.1.6 and 5.4.2.4 through 5.4.2.11 of this report, PASS installation and procedures had not been finalized, and training of chemistry technicians on the PASS had not been initiated.

From a review of the emergency plan training matrix and discussions with the applicant, the NRC inspector determined that the training for EC/D did not include a specialized training course entitled "Protective Action Guidelines" that had been developed by the training department for personnel who may make protective action recommendations to offsite authorities. Further, current EC/D training had not incorporated EPIP EP-2-052, "Protective Action Guidelines." According to the Plan and EPIPS, the emergency coordinator and EOF director had the responsibility to notify and make protective action recommendations to offsite authorities. The current EC/D course, "Emergency Coordinator/Director," did not have the in-depth training on protective action recommendations required for the EC/D position.

(Closed) Open Item (382/8308-08): Based on the above findings, the general area of emergency plan training program establishment appeared to be acceptable with the exception of the final development of the training program for Emergency Coordinator, EOF Director, chemistry personnel, and offsite personnel.

The following deficiency must be corrected in order to achieve an acceptable program:

(Open) Open Item (382/8402-02): Incorporate EP-2-052 and the protective action guidelines course in the training program for emergency coordinators and EOF directors.

Improvement in the following area should be considered:

(Open) Open Item (382/8402-03): Finalize the lesson plans for training offsite personnel.

3.2 Program Implementation

The area of training program implementation was reviewed with respect to the requirements of 10 CFR 50.47(b)(15) and (16); 10 CFR 50, Appendix E, paragraph IV.F; and the criteria in NUREG-0654, Sections II.G and II.O.

The NRC inspector reviewed selected training records and verified that emergency plan training had been conducted for key essential personnel within

the past year. Training for certain offsite support groups (fire, law enforcement, state and local officials) had not been conducted since 1982. NUREG-0654 recommends training for offsite support groups who may be called upon in the event of an emergency to be conducted on an annual basis. Training records for the training that had been conducted in 1983 for offsite groups were not being maintained as specified in UNT-3-002. Of the eight lesson plans designated for training offsite personnel, two had been written but had not been reviewed or approved in accordance with training department procedures. The remaining six lesson plans had not been prepared.

While reviewing plant personnel training files, the NRC inspector identified certain minor discrepancies involving records not posted, a lesson plan that was out of date, and grading of quizzes. These items were discussed with selected training department personnel. Steps were being taken to post the records and bring the lesson plan up to date. The matter of test and quiz control is under review and will be incorporated in UNT-03-01, "Instructor Certification," and UNT-03-022, "Exam Control."

Training for nonessential LP&L personnel had been conducted and was documented. Training for contractor, construction, and other nonessential non-LP&L personnel had been conducted to some extent; however, training for nonessential personnel had not been fully implemented at the site. There appeared to be no current procedure to verify that all nonessential construction personnel who have unescorted access to the protected area will receive or have already received the required general employee training.

Training for chemistry personnel on the operation of the PASS is incomplete. Because installation of the PASS and operating procedures are incomplete, the training for chemistry technicians who use the PASS during an emergency had not been initiated. The PASS is discussed further in Sections 4.1.1.5-4.1.1.7 of this report.

The following deficiencies must be corrected in order to achieve an acceptable program:

(Open) Open Item (382/8308-09): Provide emergency plan training for all onsite personnel, as appropriate, and offsite support personnel as delineated in Section 8 of the Plan.

(Open) Open Item (382/8308-10): Upgrade the training files in accordance with established procedures to reflect the emergency training that has been conducted. Include in the files the training conducted for all offsite groups.

4.0 EMERGENCY FACILITIES AND EQUIPMENT

4.1 Emergency Facilities

4.1.1 Assessment Facilities

The following facilities were inspected with respect to the requirements of 10 CFR 50.47(b)(8); 10 CFR 50, Appendix E, paragraph IV.E; and the criteria in NUREG-0654, Section II.H.

4.1.1.1 Control Room

(Closed) Open Item (382/8308-11): The NRC inspector toured the control room and determined that the emergency response documentation was properly stored and available for use by control room personnel. The applicant had issued Procedure NSI-452, "Emergency Facilities and Equipment Readiness," for the periodic inventory control of emergency response documents on a monthly basis. The applicant's response appeared to be adequate.

4.1.1.2 Technical Support Center

(Closed) Open Item (382/8308-12): The NRC inspector toured the TSC and determined that it contained the appropriate up-to-date records and documents required by the Plan and EPIPs. The applicant had issued Procedure NSI-452, "Emergency Facilities and Equipment Readiness," for the periodic inventory control of emergency response documents on a monthly basis. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-13): The applicant had designated a space within the TSC for the specific use of the NRC with access to the emergency notification system (ENS) and health physics network (HPN) telephone systems. This space had been specified in Procedure EP-2-100, "Technical Support Center Activation, Operation, and Deactivation." The applicant's response appeared to be adequate.

4.1.1.3 Operational Support Center

(Closed) Open Item (382/8308-14): The applicant had issued the Emergency Management Resource Book which included a listing of all maintenance personnel by craft discipline. This document is updated monthly and was verified to be properly stored in the OSC cabinet through the periodic inventory control procedure. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-15): The NRC inspector toured the backup OSC and determined that the telephones were labeled with the proper telephone extension numbers. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-16): The NRC inspector examined Procedure EP-2-101, "Operational Support Center Activation, Operation and Deactivation," and determined that Attachment 7.2 had been revised to specify the essential records and equipment that should be transported to the backup OSC in the event the primary location becomes uninhabitable. The applicant's response appeared to be adequate.

4.1.1.4 Emergency Operations Facility

(Closed) Open Item (382/8308-17): An operable HPN extension has been installed in the interim EOF. The NRC provided the appropriate instrument.

(Closed) Open Item (382/8308-18): An operable ENS extension has been installed in the interim EOF. The NRC provided the appropriate instrument.

(Closed) Open Item (382/8308-19): The NRC inspector toured the interim EOF and determined that it contained the appropriate up-to-date records and documents required by the Plan and EPIPs. The applicant issued Procedure NSI-452, "Emergency Facilities and Equipment Readiness," for the periodic inventory control of emergency response documents on a monthly basis. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-20): The NRC inspector determined that the interim EOF was equipped with a set of aperture cards reflecting the latest revisions of facility drawings and an aperture card reader/printer. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-21): The NRC inspector toured the interim EOF and determined that it contained a first-aid trauma kit and personnel decontamination kit. Both kits were found to be properly stored and documented on the applicable periodic inventory control procedures. The applicant's response appeared to be adequate.

4.1.1.5 Post-Accident Coolant Sampling and Analysis

The responsibility for this area has been transferred to the Facilities Radiation Protection Section, Region IV. The following open items will be addressed following their future inspections:

(Open) Open Item (382/8308-22)
(Open) Open Item (382/8308-23)

4.1.1.6 Post-Accident Containment Air Sampling and Analysis

The responsibility for this area has been transferred to the Facilities Radiation Protection Section, Region IV. The following open items will be addressed following their future inspections:

(Open) Open Item (382/8308-24)
(Open) Open Item (382/8308-25)

4.1.1.7 Post-Accident Gas and Particulate Effluent Sampling and Analysis

The responsibility for this area has been transferred to the Facilities Radiation Protection Section, Region IV. The following open items will be addressed following their future inspections:

(Open) Open Item (382/8308-26)
(Open) Open Item (382/8308-27)
(Open) Open Item (382/8308-28)

4.1.1.8 Post-Accident Liquid Effluent Sampling and Analysis

The responsibility for this area has been transferred to the Facilities Radiation Protection Section, Region IV. The following open items will be addressed following their future inspections:

(Open) Open Item (382/8308-29)
(Open) Open Item (382/8308-30)
(Open) Open Item (382/8308-31)

4.1.1.9 Offsite Laboratories

The following deficiency must be corrected in order to achieve an acceptable program:

(Open) Open Item (382/8308-32): The applicant made a decision not to equip the interim EOF as a backup lab for sample analysis during an accident. The NRC inspectors had discussions with the applicant; the applicant personnel were told that a backup analytical capability for onsite and offsite radiological air samples was necessary due to the apparent high contamination potential of the primary analytical laboratories. The applicant agreed to dedicate a spare offsite monitoring kit as a backup portable analytical laboratory. This item remains open pending completion of dedicating the equipment and revision of the procedure. Appropriate procedures (e.g., EP-2-101, Revision 4, "Operational Support Center Activation, Operation, and Deactivation") were to be upgraded to reflect this commitment.

4.1.2 Protective Facilities

4.1.2.1 Assembly/Reassembly Areas

This portion of the applicant's program had been found to be adequate during the previous inspection with no open items identified.

4.1.2.2 Medical Treatment Facilities

The area of medical treatment facilities was reviewed with respect to the requirements of 10 CFR 50(b)(12); 10 CFR 50, Appendix E, paragraph IV.E; and criteria in NUREG-0654, Section II.H.

(Closed) Open Item (382/8308-33): The NRC inspector reviewed Section 7.4.10, "First Aid and Medical Facilities," of the Plan; UNT-7-018, Revision 1, "First Aid and Medical Care"; and inspected the locations of first-aid kits in the plant. The location of first-aid kits and their contents were found to be as specified in the Plan and EPIPs. UNT-7-018 required monthly inventory of first-aid kits. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-34): The NRC inspector reviewed EP-2-020, Revision 5, "Contaminated/Injured/Ill Personnel." Note 2 under Section 5.1.4 of the procedure states that the security pickup truck will be used for transportation of patients to the helicopter pad near the site. If the security truck is unavailable, any other pickup or station wagon may be used. The applicant's response appeared to be adequate.

4.1.2.3 Decontamination Facilities

The area of decontamination facilities was reviewed with respect to the requirements of 10 CFR 50.47(b)(8), (10), and (11); 10 CFR 50, Appendix E, paragraph IV.E; and criteria in NUREG-0654, Sections II.J and K.

(Closed) Open Item (382/8308-35): The NRC inspector reviewed Sections 7.4.8 and 7.4.10 of the Plan; EP-2-032, Revision 4, "Monitoring and Decontamination"; inspected decontamination kits in the interim EOF, OSC, and at the reactor building access control; and inspected the personnel decontamination facility at access control. The first-aid kits and their contents were found to be as specified in the Plan and EPIPs. The decontamination facility had been constructed; however, the sump drain beneath the decontamination tubs appeared to be plugged or shut off, making the tubs unusable. The NRC inspector inspected the decontamination facility prior to leaving the station and noted that water did drain from the sump area. The applicant's response appeared to be adequate.

4.1.3 Expanded Support Facilities

This portion of the applicant's program had been found to be adequate during the previous inspection with no open items identified.

4.1.4 News Center

The news center was reviewed with respect to the requirements of 10 CFR 50.47(b)(6); 10 CFR 50, Appendix E, paragraph IV.D; and criteria in NUREG-0654, Section II.G.

The NRC inspector reviewed the Waterford 3 EPIP and toured the LP&L information center with the emergency news director and the communications manager. The NRC inspector reviewed the news media work area, reviewed the established media telephone service, and discussed availability of additional telephone service if needed. Electrical outlets and 40 telephones were available for use by the news media representatives. The telephones were installed and operable. The electrical outlets, tables, and telephone facilities appeared adequate for the facility area. The availability of additional telephone service and provisions

for acquiring additional telephone service had not been determined by LP&L. The LP&L information center is located on the eighth floor of the New Orleans Public Services Incorporated (NOPSI) building located on Baronne Street in downtown New Orleans. Since the March 1983 appraisal, LP&L and NOPSI have merged, and the public relations staff and the news media center have been moved to the NOPSI facility. The new downtown location is approximately 35 miles from the Waterford 3 site. The driving time to the site from the NOPSI news center is approximately 1 hour.

(Closed) Open Item (382/8308-36): The Waterford 3 EPIP had been submitted to the NRC for approval. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-37): Provisions for an information center large enough to accommodate an anticipated number of media representatives for an incident at Waterford 3 had been provided by LP&L. The applicant's response appeared to be adequate.

Improvement in the following area should be considered:

(Open) Open Item (382/8308-38): Make provisions and include arrangements for availability of additional telephone service.

4.2 Emergency Equipment

4.2.1 Assessment Equipment

4.2.1.1 Emergency Kits and Emergency Survey Instruments

The area of emergency survey kits and instruments was reviewed against the requirements of 10 CFR 50.47(b)(9); 10 CFR 50, Appendix E, paragraph IV.E; and criteria in NUREG-0654, Sections II.H and I.

(Closed) Open Item (382/8308-40): Dedicated emergency instruments and air samplers were observed to be calibrated. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-41): The NRC inspector inventoried the field monitoring kit lockers. Respiratory protection, shoe covers, and a contamination monitor were not observed in the kits. This item was closed based on the commitment by the senior vice president-nuclear operations to include these items in the kits.

(Closed) Open Item (382/8308-43): The NRC inspector observed identification on emergency lockers. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-44): The NRC inspector reviewed applicant calculations that indicated the Ludlum 2218 had the capability to detect 1E-7 uCi/cc of iodine in a 5 mR/hr background. The applicant committed to performing appropriate equipment and procedure changes to include the

capability to analyze air samples under field condition (1E-9 uCi/cc). Laboratory equipment used to analyze air samples for particulates had information which depicted the minimum detectable limit to be less than 1E-9 uCi/cc. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-45): The applicant intended to use standard thermoluminescent dosimeters (TLDs) for emergency extremity monitoring. TLDs may be taped to the wrist and/or ankle of emergency workers. The applicant's response appeared to be adequate.

Improvements in the following areas should be considered:

(Open) Open Item (382/8308-39): The NRC inspector compared emergency kit and locker (interim EOF, OSC, field team) inventories with procedure inventories (EP-3-040, Revision 3). Several items were observed missing (clipboards, radios, etc.). In addition, several instruments (Ludlum 177 in interim EOF health physics locker and Ludlum 2218 in field kits) were present in the area, but were not located in the kits. The applicant agreed to upgrade EP-3-040 to account for these instruments being stored outside the emergency kits. EP-3-040 should be upgraded to include many essential items (e.g., self-reading dosimeter [SRD] charger) stored in the interim EOF emergency locker, but not listed in the procedure inventory.

(Open) Open Item (382/8308-42): The NRC inspector observed emergency lockers with padlocks. This does not necessarily aid in controlling emergency kit inventories and could prevent timely access to the kits in an emergency.

(Open) Open Item (382/8308-46): Contrary to the applicant's response, the applicant had not added an SRD charger to the hospital inventory list (EP-3-040, Revision 3, "Emergency Equipment Inventory"). The hospital emergency locker was not inspected to determine if an SRD charger had been placed in the locker.

4.2.1.2 Area and Process Radiation Monitors

The responsibility for this area has been transferred to the Facilities Radiation Protection Section, Region IV. The following open item will be addressed following their future inspections:

(Open) Open Item (382/8308-47)

4.2.1.3 Nonradiation Process Monitors

The nonradiation process monitors were reviewed with respect to the requirements of 10 CFR 50.47(b)(9); 10 CFR 50, Appendix E, paragraph IV.E; and the criteria in NUREG-0654, Section II.H.

(Closed) Open Item (382/8308-48): The NRC inspector reviewed documentation which indicated that the applicant's seismic monitoring system had been operational as of June 27, 1983. The applicant's response appeared to be adequate.

The following deficiencies must be corrected in order to achieve an acceptable program:

(Open) Open Item (382/8308-49): Contrary to the applicant's response, the inconsistency between the seismic annunciator number specified in Revision 3 of EP-1-001, Attachment 7.1, Table F and the locations of the annunciators actually installed in the control room had not been resolved. The procedure states the annunciator is on panel CP-35. The NRC inspector observed the annunciator on panel CP-36.

(Open) Open Item (382/8308-50): As per OP-903-064, "Mississippi River Level Monitoring, Revision 0," the river level is recorded once per day when the river level surpasses +24 feet mean seal level (MSL) and once every 2 hours when the river level exceeds +27 feet MSL. The hydrologic gauge station located near the intake structure is used to determine river level. The procedure must be signed by the operator and the shift supervisor to be completed. The NRC inspector determined that the river level gauge near the intake structure could not be read from the levee because of the small numbers on the gauge. Further, the applicant had no provision for reading the gauge at night. This would not allow the 2-hour reading requirement to be fulfilled when river level exceeded +27 MSL. Additionally, the person responsible for implementing this procedure had not been designated.

4.2.1.4 Meteorological Instrumentation

The area of meteorological instrumentation was reviewed against 10 CFR 50.47(b)(9); 10 CFR 50, Appendix E, paragraph IV.B; and the criteria set forth in Regulatory Guides 1.23, 1.97, and 1.101; and criteria in NUREGs-0696, -0654, and -0737.

(Closed) Open Item (382/8308-51): A tone alert weather radio had been installed and may be monitored in the security office. Security Department Directive D-007 described the procedure for maintaining the weather alert radio. Adverse weather information received on the weather alert radio may be used to notify the nuclear operations supervisor. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-52): The NRC inspector observed that dose projection calculation subroutine (CEPADAS) will have the capability to provide the basic meteorological parameters averaged over 15-minute time periods in the control room via cathode ray tube (CRT) display. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-54): In Attachment 7.7 of EP-2-050, Revision 3, the stability classification scheme is consistent with Regulatory Guide 1.23. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-56): The NRC inspector reviewed scheduling and selected procedures for meteorological sensor calibrations and determined that both had been established in Plant Operating Manual Procedures MI-3-395, Revision 1, MI-3-396, Revision 1, and MI-3-397, Revision 0. The applicant's response appeared to be adequate.

The following deficiency must be corrected in order to achieve an acceptable program:

(Open) Open Item (382/8308-53): In EP-2-050, Revision 3, the use of National Weather Service (NWS) temperature lapse rate was deleted, but no methodology is described for obtaining stability characteristics from NWS. The applicant's response was not fully adequate.

Improvement in the following area should be considered:

(Open) Open Item (382/8308-55): The procedures for the scheduling of inspection and recording systems had not been adequately documented. Procedure MI-4-299 did not state the scheduling of instrumentation electronic checks. A new procedure was being implemented for daily inspection of the tower by station operations personnel; however, the procedure had not been approved by the applicant's management.

4.2.2 Protective Equipment

4.2.2.1 Respiratory Protection

Respiratory protection equipment was reviewed with respect to the requirements of 10 CFR 10.47(b)(11); 10 CFR 50, Appendix E, paragraph IV.E; and criteria given in NUREG-0654, Section II.H; ANSI Z88.2-1969; and Regulatory Guide 8.15.

(Closed) Open Item (382/8308-57): The NRC inspector observed the location of two self-contained breathing apparatus (SCBA) compressors in the turbine building. No obstacles to moving the compressors from that location under accident conditions were observed. The applicant's response appeared to be adequate.

4.2.2.2 Protective Clothing

This portion of the applicant's program had been found to be adequate during the previous inspection with no open items identified.

4.2.3 Communications

The area of communications was evaluated against the requirements of 10 CFR 50.47(b)(6); 10 CFR 50, Appendix E, paragraph IV; E; and criteria in NUREG-0654, Section II.F.

(Closed) Open Item (382/8308-58): The NRC inspector reviewed Section 7.5.2, "Emergency Communications Systems," of the Plan; EP-2-010, Revision 5, "Notification and Communication"; and requested testing of the operational hotline and backup communication systems. Not all offsite organizations responded to the operational hotline in every test; however, operations personnel were able to contact those organizations not responding by commercial telephone per EP-2-010. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-59): The NRC inspector reviewed EP-3-040, Revision 3, "Emergency Equipment Inventory," inspected the contents of the OSC emergency locker, and reviewed selected past inventory records. The OSC locker inventory included five handheld portable radios; however, the NRC inspector noted that four of the radios were missing (this was also recorded on the latest inventory records). The applicant had experienced a problem with the radios but had taken corrective action and had ordered replacement radios. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-60): The NRC inspector observed that the sound powered communication system had been installed in the remote shutdown control room. A communication check indicated that the system functioned as designed. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-61): The NRC inspector observed a test of the fire and station alarms on February 1, 1984. Members of the team were positioned around the plant to test the audibility of the alarms. The alarms were audible in those selected locations monitored. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-63): The NRC inspector inspected the control room, TSC, and interim EOF; conducted tests of the installed HPN and ENS systems; and witnessed tests conducted by the applicant. The applicant had experienced problems with the telephone company in getting the HPN and ENS installed in the interim EOF. The HPN and ENS in the TSC and control room were operational, although some difficulty was encountered in contacting NRC Region IV and NRC Headquarters via the HPN.

The following deficiency must be corrected in order to achieve an acceptable program:

(Open) Open Item (382/8308-62): The NRC inspector reviewed the applicant's letter W3P83-4210, K. W. Cook to E. Johnson, USNRC, dated December 28, 1983. The applicant had committed to perform noise level tests and review paging system audibility after the plant goes to 5 percent power operation. This item remains open pending completion of these tests and resolution of any problems identified during the tests.

4.2.4 Damage Control/Corrective Action

The area of corrective action and maintenance equipment and supplies was reviewed with respect to the requirements of 10 CFR 50.47(b)(8); 10 CFR 50, Appendix E, paragraph IV.E; and criteria in NUREG-0654, Section II.H.

(Closed) Open Item (382/8308-64): The NRC inspector discussed the use and location of tools available for damage control and recovery in the OSC with the superintendent and supervisor of maintenance. The plant maintenance shop and tool storage area is located directly below the OSC in the maintenance building. Damage control and recovery tools may be obtained from these locations during an emergency. Alternate tool and equipment locations were in the hot tool storage area and the hot maintenance shop in the reactor auxiliary building. The applicant's response appeared to be adequate.

4.2.5 Reserve Emergency Supplies and Equipment

The area of reserve emergency supplies and equipment was reviewed with respect to the requirements of 10 CFR 50.47(b)(8); 10 CFR 50, Appendix E, paragraph IV.E; and criteria in NUREG-0654, Section II.H.

The applicant had on reserve approximately 1500 sets of anticontamination clothing (cover shoes, gloves, hoods, and rubber gloves). Additionally, there were 425 full face respirators, 105 SCBA, and 100 extra breathing air bottles on inventory. The applicant had letters of agreement with other utilities in the geographical area for additional supplies.

(Closed) Open Item (382/8308-65): The NRC inspector reviewed Section 8.4, "Maintenance and Inventory of Emergency Equipment and Supplies," of the Plan; reviewed EP-3-040, Revision 3, "Emergency Equipment Inventory"; completed emergency and decontamination kit inventory records; and compared kit contents with the specified inventory lists. The Plan and procedures required that any equipment removed from the kits or lockers for repair, calibration, or other reasons be replaced immediately so as to maintain a full complement of emergency equipment at all times. A spot check of kit contents indicated that the specified number of portable radios were not present in the OSC locker. It was noted that the applicant had experienced a problem with the radios and had implemented corrective action. The applicant's response appeared to be adequate.

4.2.6 Transportation

The area of transportation available for emergency response was reviewed with respect to the requirements of 10 CFR 50.47(b)(8); 10 CFR 50, Appendix E, paragraph IV.E; and the criteria in NUREG-0654, Section II.H.

(Closed) Open Items (382/8308-66, 382/8308-67, 382/8308-68, 382/8308-69, and 382/8308-70): The NRC inspector reviewed Sections 6.4.1.1 and 6.7.4 of the

Plan; EP-2-060, Revision 3, "Radiological Field Monitoring"; EP-2-101, Revision 4, "Operational Support Center Activation, Operation, and Deactivation"; and UNT-4-032, Revision 0, "Control of Emergency Vehicles." In addition, the NRC inspector inspected the designated emergency response vehicles and requested a test of radio communications between the interim EOF and an emergency vehicle. The applicant had designated two four-wheel drive vehicles for emergency field team use. Two additional vehicles were designated for backup use. UNT-4-032 requires persons using the emergency vehicles to monitor the radio at all times when away from the plant to ensure that the vehicles can be recalled. In addition, the applicant has committed to require persons using the vehicles to carry a portable pager or radio. The radio communications check indicated that communications with the interim EOF would be adequate up to 10 miles from the plant. One vehicle did not have a two-way radio installed at the time of the inspection, but the applicant indicated that the radio was on order. Both four-wheel drive vehicles provided a sheltered location to store, carry, and utilize radiological counting equipment. Based on the above, this portion of the applicant's program appeared to be adequate.

5.0 EMERGENCY IMPLEMENTING PROCEDURES

This area was reviewed with respect to their requirements of 10 CFR 50.47.(b)(5) and(6); 10 CFR 50, Appendix E, paragraph IV.D; and the criteria in NUREG-0654, Sections II.E, F, H, and J.

5.1 General Content and Format

(Closed) Open Item (382/8308-71A): The NRC inspector examined Procedure EP-2-050, "Offsite Dose Assessment (Manual)," and determined that Attachment 7.5 had been issued. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-71B): The NRC inspector determined that Procedure EP-2-051, "Offsite Dose Assessment (Computerized)," had been issued with Revision 1 in effect since January 11, 1984. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-71C): The NRC inspector determined that Procedure EP-2-061, "Emergency Environmental Monitoring," had been issued with Revision 1 in effect since January 11, 1984. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-71D): The NRC inspector examined Procedure EP-1-001, "Recognition and Classification of Emergency Conditions," and determined that the listing of values for the emergency action levels in Tables A and B had been completed. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-71E): The NRC inspector determined that Procedure EP-2-091, "Emergency Chemistry," had been issued with Revision 1 in effect since January 11, 1984. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-71F): The NRC inspector examined Procedure EP-2-101, "Operational Support Center Activation, Operation, and Deactivation", and determined that Attachment 7.1 had been completed. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-71G): The applicant had deleted Procedure EP-2-120, "Natural Emergencies," from the EPIPs. Operating Procedures OP-901-044, "Seismic Event," and OP-901-045, "Severe Weather and Flooding," were examined by the NRC inspector and determined to adequately prescribe actions to be taken during natural emergencies. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-71H): The NRC inspector examined Procedure EP-2-020, "Contaminated Injured/Ill Personnel," and determined that the telephone number for the St. Charles Ambulance Service had been properly included. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-71I): The NRC inspector determined that the "Emergency Plan Abstract" and references had been removed from the emergency plan implementating documents. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-71J): The NRC inspector determined that Procedure EP-3-010, "Emergency Plan Training," had been deleted from the EPIPs and replaced by administrative Procedure UNT-3-0090, "Emergency Plan Training," which had been issued with Revision 0 in effect since January 6, 1984. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-71K): The NRC inspector determined that Procedure EP-3-020, "Emergency Preparedness Drills and Exercise," had been issued with Revision 1 in effect since January 11, 1984. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-71L): The applicant had deleted Procedure EP-3-050, "Emergency Response Call List," as an EPIP. In its place, Procedure EP-3-050, "Emergency Organization Documentation and Control," had been issued with Revision 2 in effect since January 11, 1984. EP-3-050 promulgates the Emergency Management Resources Book which contained the names and telephone numbers of emergency response personnel. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-72): The NRC inspector determined that Procedures UNT-1-003, "Procedure Development, Review and Approval; Change and Revision; and Deletion," and UNT-4-009, "Control, Distribution, and Handling of Program Descriptions and Plant Operating Procedures," contained adequate provisions for the control and distribution of changes to the EPIPs. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-73): The NRC inspector examined the EPIPs and determined that the applicant had removed, where applicable, the revision number from the title of procedures referenced in the emergency procedures. This was accomplished to preclude the need to revise an emergency procedure when the revision number of a referenced procedure changed. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-74): The NRC inspector determined that the applicant had reviewed the EPIPs to ensure that when the user was directed to perform operations under a plant procedure, the number of the plant procedure is included in the action step. The applicant's response appeared to be adequate.

5.2 Emergency, Alarm, and Abnormal Occurrence Procedures

This portion of the applicant's program had been determined to be adequate during the previous inspection with no open items identified.

5.3 Implementing Instructions

(Closed) Open Item (382/8308-75): The NRC inspector determined that the applicant had revised the Plan, Section 5.1.2.2, and Procedures EP-2-100, "TSC Activation, Operation, and Deactivation," and EP-2-102, "EOF Activation, Operation, and Deactivation," to specify those functional responsibilities that the emergency coordinator may not delegate to other elements of the emergency organization. The applicant's response appeared to be adequate.

5.4 Implementing Procedures

5.4.1 Notifications

(Closed) Open Item (382/8308-76): The applicant had deleted Procedure EP-3-050, "Emergency Response Call List," as an EPIP. In its place, Procedure EP-3-050, "Emergency Organization Documentation and Control," had been issued with Revision 2 in effect since January 11, 1984. EP-3-050 promulgates the Emergency Management Resources Book which contained the names and telephone numbers of emergency response personnel. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-77): The NRC inspector examined Procedure EP-2-010, "Notifications and Communications," and determined that Attachment 7.1 had been simplified to ensure that the answering machine may be quickly activated and the initial notifications completed.

5.4.2 Assessment Actions

The area of assessment actions was reviewed with respect to the requirements of 10 CFR 50.47(b)(8), (9), and (11); 10 CFR 50, Appendix E, paragraphs IV.B; and criteria in NUREG-0654, Sections II.I and J.

The applicant Procedure EP-2-052, "Protective Action Guidelines," had been used to coordinate the overall implementation of the accident assessment scheme for the determination of appropriate protective action recommendations to offsite agencies. The NRC inspector reviewed EP-2-052 and determined it to be written for use by the emergency coordinator and to prescribe the interfaces with other EPIPs that were essential for the proper assessment of accident conditions as determined from plant parameters and radiological measurements. Two emergency Procedures EP-2-050, "Offsite Dose Assessment (Manual)," and EP-2-051, "Offsite Dose Assessment (Computerized)," provided the methodology for the determination of projected offsite doses based on plant parameters and measured radiological release concentrations. Provisions existed in the procedures for the use of measured offsite radiological data in determining offsite dose projections.

Rapid assessment capabilities had been provided in the form of a nomogram that may be readily used by control room personnel for the determination of offsite doses. The nomogram may use readily available control room information. It

was noted by the NRC inspector that due to a mislabeling of a scale on the nomogram, the projected curie release rate was low by a factor of ten when compared to the results of a manual release rate calculation. This was immediately corrected by the applicant to assure that the nomogram could be used to conservatively predicate the projected offsite doses. Discussions with the applicant training representatives revealed that the lesson plan for the training of personnel in dose assessment had not been updated to include the methods for use of the nomogram.

In the event that the plant instrumentation was not in service or offscale, projected dose rate from analyzed accident conditions was available in the procedures for making offsite protective action recommendations. The procedures adequately provided for the determination of the affected offsite sectors and areas as indicated from available meteorological information. It was noted by the NRC inspector that the hierarchy for the selection of meteorological data from the control room CRT display was not provided for the operator. This caused some confusion for the operators in addition to the designation of tower height in meters in the facility procedures while CRT displays were in units of feet.

The computer software for communicating plant radiation monitor data to the CEPADAS in the plant computer was in the preoperational test phase and was scheduled for completion in approximately 3 weeks. This may make the effective date for EP-2-051 on or about March 1, 1984.

Improvements in the following areas should be considered:

(Open) Open Item (382/8402-04): The training lesson plan for dose assessment should be revised to include the use of the nomogram prescribed in Attachment 7.1 to EP-2-050.

(Open) Open Item (382/8402-05): The hierarchy for the selection of meteorological data for dose projections should be included in EP-2-050.

(Open) Open Item (382/8402-06): The same units for specifying meteorological tower heights should be used in both the procedures and control room displays to minimize operator confusion.

5.4.2.1 Offsite Radiological Surveys

The area of offsite radiological surveys was reviewed with respect to the requirements of 10 CFR 50.47(b)(8), (9), and (11); 10 CFR 50, Appendix E, paragraphs IV.B and E; and criteria in NUREG-0654, Sections II.H, I, and K.

(Closed) Open Item (382/8308-78): The NRC inspector reviewed EP-2-060, Revision 3, "Radiological Field Monitoring," with special attention to Section 5.8 of the procedure. Section 5.8 addresses radiological protection

precautions for field monitoring teams. It was noted that no provisions for respiratory protection or dosimetry for field monitoring teams were made in the procedure. The senior vice president-nuclear operations had committed to include respiratory protective equipment in the field kits prior to fuel loading. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-79): The NRC inspector reviewed EP-2-060, Revision 3, "Radiological Field Monitoring," and EP-3-040, Revision 3, "Emergency Equipment Inventory." It was noted that the field monitoring kit inventory checklists contained in these procedures did not include shoe coverings for contamination control, nor did they include respiratory protective equipment. The applicant has committed to include these items in the kits. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-80): The NRC inspector reviewed EP-2-060, Revision 3, "Radiological Field Monitoring." The procedure had been revised to address backup communications for field monitoring teams in Section 5.5.3.2. Backup communications included portable radios and provisions for teams to use commercial pay telephones in the event radio communications are interrupted. However, it was noted that backup communications for field teams were not addressed in Table 7-10 of the Plan. The applicant committed to include the backup communication list in Figure 7-10 of the Plan. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-81): The NRC inspector reviewed UNT-4-032 and EP-2-060, Revision 3, "Radiological Field Monitoring." Section 5.7 addresses where and how vehicles may be obtained for offsite surveys. Teams are instructed to obtain keys to assigned vehicles from the OSC supervisor and to pick up vehicles at specified locations. Further, UNT-4-032 described offsite control of emergency vehicles and travel constraints. The applicant's response appeared adequate.

5.4.2.2 Onsite (Out-of-Plant) Surveys

The area of onsite (out-of-plant) surveys was reviewed with respect to the requirements of 10 CFR 50.47(b)(8) and (11); 10 CFR 50, Appendix E, paragraph IV.E; and criteria in NUREG-0654, Section II.K.

(Closed) Open Item (382/8308-82): The NRC inspector reviewed EP-2-034, Revision 1, "Onsite Surveys During Emergencies." This procedure provided special instructions for surveys to be performed onsite (out-of-plant) under emergency conditions. The procedure references HP-2-201, 210, and 215 which included survey techniques under normal conditions. The applicant's response appeared to be adequate.

5.4.2.3 In-Plant Radiological Surveys

The area of in-plant radiological surveys was reviewed with respect to the requirements of 10 CFR 50.47(b)(8) and (11); 10 CFR 50, Appendix E, paragraph IV.E; and criteria in NUREG-0654, Section II.K.

(Closed) Open Item (382/8308-83): The NRC inspector reviewed EP-2-031, Revision 3, "In-Plant Radiological Controls and Surveys During Emergencies." This procedure provided special instructions for in-plant surveys under emergency conditions, but indicated that normal health physics procedures (HP-201, 210, and 215) should be used to the extent possible. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-84): The NRC inspector reviewed Sections 7.4.2.6, "Portable Radiation Detection Equipment"; 7.4.2.8, "Personnel Survey Instrumentation"; Table 7-5; Appendices A and G of the Plan; EP-2-031, Revision 3, "In-Plant Radiological Controls and Surveys During Emergencies"; and EP-3-040, Revision 3, "Emergency Equipment Inventory." EP-3-040 listed dedicated emergency radiation detection instrumentation located in the emergency lockers and kits in the OSC, TSC, and interim EOF. Reserves of instruments were available at access control, and agreements for provision of backup instrumentation from other utilities were in place. The applicant's response appeared to be adequate.

5.4.2.4-5.4.2.11 Primary Coolant Sampling and Analysis; Containment Air Sampling and Analysis; Stack Effluent Sampling and Analysis; and Liquid Effluent Sampling and Analysis

The responsibility for this area has been transferred to the Facilities Radiation Protection Section, Region IV. The following open items will be addressed following their future inspections:

(Open) Open Item (382/8308-85)
(Open) Open Item (382/8308-86)
(Open) Open Item (382/8308-87)
(Open) Open Item (382/8308-88)
(Open) Open Item (382/8308-89)
(Open) Open Item (382/8308-90)
(Open) Open Item (382/8308-91)
(Open) Open Item (382/8308-92)
(Open) Open Item (382/8308-93)

5.4.2.12 Radiological and Environmental Monitoring Program

The area of radiological and environmental monitoring during emergencies was reviewed with respect to the requirements of 10 CFR 50.47(b)(19); 10 CFR 50, Appendix E, paragraph IV.B; and specific criteria in NUREG-0654, Section II.I.

(Closed) Open Item (382/8308-94): The NRC inspector reviewed EP-2-061, Revision 1, "Emergency Environmental Monitoring," which had been completed since the initial appraisal. The procedure addressed dispatching of teams (per EP-2-060), collection of samples (air, vegetation, milk, soil, and water), direct radiation readings, contamination measurement, collection of environmental dosimeters, sampling locations, and sample identification. The applicant's response appeared to be adequate.

5.4.3 Protective Actions

5.4.3.1 Radiation Protection During Emergencies

The area of radiation protection during emergencies was reviewed against the requirements of 10 CFR 50.47(b)(11); 10 CFR 50, Appendix E, paragraph IV.A; and criteria in NUREG-0554, Section II.K.

(Closed) Open Item (382/8308-95): The applicant had revised EP-2-031, Revision 3, "In-Plant Radiological Controls and Surveys During Emergencies," to include additional guidance on the conduct of radiation protection activities during an emergency. The applicant's response appeared to be adequate.

5.4.3.2 Evacuation of Owner-Controlled Areas

The area of owner-controlled area personnel evacuation was reviewed with respect to the requirements of 10 CFR 50.47(b)(10) and criteria in NUREG-0654.

(Closed) Open Item (382/8308-96): The NRC inspector reviewed EP-2-031, EP-2-101, and EP-2-102 and determined by review that the applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-98): The NRC inspector reviewed EP-2-070, EP-2-071, and EP-2-081 and noted that the control point watch was not addressed. Discussions with a member of the emergency preparedness staff revealed that the control point watch position had been deleted. The applicant's response appeared to be adequate.

The following deficiency must be corrected in order to achieve an acceptable program:

(Open) Open Item (382/8308-97): The applicant had not provided the NRC inspector with verification that the public address system had been evaluated and had been determined to be adequate for notifying the site personnel of an emergency.

5.4.3.3 Personnel Accountability

The area of personnel accountability was reviewed with respect to the requirements of 10 CFR 50.47(b)(10) and criteria in NUREG-065, Section J.5.

The following deficiency must be corrected in order to achieve an acceptable program:

(Open) Open Item (382/8308-99): The NRC inspector reviewed Section 6.6.1 of the Plan, EP-190, and PS 16-103 for site personnel accountability. The NRC inspector determined by review that the site accountability in the Plan and EPIPs had been changed to account for personnel only in the protected area.

The NRC inspector determined by review of each procedure that personnel accountability had been redefined to exclude all personnel outside the station protected area. Personnel accountability procedures must include the owner-controlled area and the exclusion area boundary. It should be noted that the owner-controlled area (outside the protected area) may be searched to verify that site personnel have evacuated the area. Verification of evacuation shall be reported according to EP-2-190.

5.4.3.4 Personnel Monitoring and Decontamination

The area of personnel monitoring and decontamination was reviewed with respect to the requirements of 10 CFR 50.47(b)(10) and (11); 10 CFR 50, Appendix E, paragraph IV.B; and criteria in NUREG-0654, Sections II.J, K, and L.

(Closed) Open Item (382/8308-100): The NRC inspector reviewed EP-2-032, Revision 4, "Monitoring and Decontamination," and HP-2-704, Revision 1, "Personnel Decontamination." HP-2-704 uses 100 cpm with a pancake GM probe as a release limit. EP-2-032 uses 1000 dpm but included a notation in parenthesis that 100 cpm is the equivalent. Health physics technicians interviewed by the NRC inspector appeared to be familiar with the use of either unit (cpm or dpm) as well as their interconversion. The applicant's response appeared to be adequate.

5.4.3.5 Onsite First Aid/Rescue

This portion of the applicant's program had been determined to be adequate during the previous inspection with no open items identified.

5.4.4 Security During Emergencies

This portion of the applicant's program had been determined to be adequate during the previous inspection with no open items identified.

5.4.5 Repair/Corrective Actions

The area of repair/corrective actions was reviewed with respect to the requirements of 10 CFR 50.47(b)(13); 10 CFR 50, Appendix E, paragraph IV.H; and criteria in NUREG-0654, Section II.K.

(Closed) Open Item (382/8308-101): The applicant had revised EP-2-101, Revision 4, "Operational Support Center Activation, Operation, and Deactivation," to include a reference to EP-2-030, Revision 2, "Emergency Radiation Exposure Guidelines and Controls." EP-2-030 listed specific 10 CFR 20 dose limits in Attachment 7.2. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-102): EP-2-030, Revision 2, "Emergency Radiation Exposure Guidelines and Controls," was reviewed by the NRC inspector. This procedure had been revised to instruct the emergency coordinator to confer with NRC personnel, to the extent practical, before authorizing radiation exposures in excess of 10 CFR 20. The applicant's response appeared to be adequate.

5.4.6 Recovery

This portion of the applicant's program had been determined to be adequate during the previous inspection with no open items identified.

5.4.7 Public Information

This area of the applicant's program was reviewed with respect to the requirements of 10 CFR 50.47(b)(6); 10 CFR 50, Appendix E, paragraph IV.D; and the criteria in NUREG-0654 and FEMA-Rep-1, Revision 1.

The NRC inspector reviewed the appropriate EPIPs to verify that the procedures identified the organizations involved in news dissemination. The news media personnel telephone numbers and other pertinent information were provided. The method for coordinating the internal dissemination of information to the various locations and individuals had been specified. Provisions for initial dissemination of information to the news media prior to establishment of the applicants news center had been provided. The applicant's spokesperson was identified, sources of information specified, and coordination of information among various organizations and groups arranged with the major exception of the state of Louisiana. The state of Louisiana does not plan to assign a public information contact in the applicant's news center since they will be operating their own emergency operations center in Baton Rouge, Louisiana, according to the emergency news center director. Consequently, the state of Louisiana will not be in a position to review any other organizations' (LP&L, St. Charles, St. Johns) news releases and no other organization will be able to review their releases. The emergency news center director had discussed this matter with the responsible state representatives but could not obtain their cooperation. While this situation is not being considered as an "open item," it nevertheless is a weak link in the public information coordination chain. NRC, Region IV will discuss this matter with the Federal Emergency Management Agency (FEMA), Region VI.

5.5 Supplementary Procedures

5.5.1 Inventory, Operational Check, and Calibration of Emergency Facilities and Equipment

These procedures were reviewed with respect to the requirements of 10 CFR 50.47(b)(8); 10 CFR 50, Appendix E, paragraph IV.E, and the criteria in NUREG-0654, Section II.H.

(Closed) Open Item (382/8308-103): Step 5.2.10 of EP-3-040, Revision 3, "Emergency Equipment Inventory," directed the person performing the inventory to sign and date the inventory sheet. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-104): The applicant had revised Procedure HP-2-409, Revision 2, "Calibration of the Eberline RO-2 and RO-2A," to reflect changes that had been made in the calibration of these instruments. The applicant's response appeared to be adequate.

5.5.2 Drills and Exercises

The area of drills and exercises was reviewed with respect to the requirements of 10 CFR 50, Appendix E, paragraphs IV.D, E.F, and H; and the criteria in NUREG-0654, Section II.N.

(Closed) Open Item (382/8308-105): The NRC inspector reviewed EP-3-020 and determined that the drill/exercise package and related information were considered priority information and not subject to player access. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-106): The NRC inspector reviewed EP-3-020 Attachment 7.10, "Milestones for Exercise Observation and Critiques." The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-108): The NRC inspector reviewed EP-3-020 and determined by review that records of drills and exercises will be retained for 6 years. The applicant's response appeared to be adequate.

Improvement in the following area should be considered:

(Open) Open Item (382/8308-107): The NRC inspector reviewed EP-3-020 line 5.4.2 and it did not reference the exercise reports that should be sent to the senior vice president-nuclear operations; however, the NRC inspector did locate the line referencing the exercise reports. The procedure should state that the senior vice president-nuclear operations will receive exercise reports.

5.5.3 Review, Revision, and Distribution

The areas of review, revision, and distribution of the Plan were reviewed with respect to the requirements of 10 CFR 50.47(b)(16); 10 CFR 50.54(q) and (t); 10 CFR 50, Appendix E, paragraphs IV.G and V; and criteria in NUREG-0654.

(Closed) Open Item (382/8308-109): The NRC inspector reviewed EP-3-030 to determine the emergency planning review and updating requirements. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-110): The NRC inspector reviewed EP-3-030 and determined that the procedure addresses the elements of 10 CFR 50, Appendix E IV.G. The procedure does address 10 CFR 50, Appendix E IV.G., submitting the EPIP to the NRC within 30 days after the change that was so stated in EP-3-030, Section 5.3.1.1. The applicant's response appeared to be adequate.

5.5.4 Audits of Emergency Preparedness

The area of inspection was reviewed with respect to the requirements of 10 CFR 50.54(q) and (t) and criteria in NUREG-0654, Section II.P.9.

(Closed) Open Item (382/8308-111): The NRC inspector reviewed EP-3-030 and held discussions with members of the station staff concerning 10 CFR 50.54(q) and (t). The NRC inspector reviewed selected reports that indicated that there had been a program implemented by the station staff. The program adequacy will be inspected in a future annual inspection. The applicant's response appeared to be adequate.

6.0 COORDINATION WITH OFFSITE GROUPS

6.1 Offsite Agencies

The area of offsite agencies was reviewed with respect to the requirements of 10 CFR 50.47(b)(3) and criteria in NUREG-0654, Sections II.A, B, E, and L.

(Closed) Open Item (382/8308-112): Agreement letters have been updated and are included in Appendix C of the Plan. The memorandum of understanding between LP&L and the state of Louisiana Nuclear Energy Division, dated October 28, 1981, is a planning item and as such is addressed in Attachment 1 to this report. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-113): From discussion with the St. John the Baptist Parish Civil Defense (CD) Director, the NRC inspector determined that the concerns of the CD director in the areas of communications, dosimetry for emergency workers, notification procedures, workers in chemical plants, and warning of individuals in fish camps had been addressed. Although some of these areas had not been completely resolved, the NRC inspector was informed that each of these items had been addressed and that there were currently no major problems. The NRC inspector informed the CD director that FEMA had been requested to review this matter and include their findings in a supplementary report of the status of offsite preparedness.

6.2 General Public

This area of the applicant's program was reviewed with respect to the requirements of 10 CFR 50.47(b)(7) and criteria in NUREG-0654, Section II.G.

The following deficiencies must be corrected in order to achieve an acceptable program:

(Open) Open Item (382/8308-114): The applicant informed the NRC inspector that the public information brochure had recently been submitted to FEMA and NRC for final review, and that distribution of the brochure will be completed prior to operation of the Waterford 3 facility above 5 percent of rated power.

(Open) Open Item (382/8308-115): The applicant informed the NRC inspector that emergency information had not been disseminated to the transient population. The applicant plans to accomplish this prior to operation of the Waterford 3 facility above 5 percent of rated power.

(Open) Open Item (382/8308-116): From discussions with the applicant, the NRC inspector determined that, following a sound-level test of selected sirens by Acoustic Technology, Inc. on November 4 and 5, 1983, the applicant determined that ten additional sirens were needed for full coverage of the 10-mile emergency planning zone with five of these allocated for areas of future population expansion. The applicant currently is procuring these sirens. On March 1, 1984, the staff discussed the

status of the alert and notification system (ANS) with applicant representatives. The applicant representatives informed the staff of their plans to submit a complete description of system installation, testing, and implementation which would provide verification of an installed and operable ANS by the end of March 1984. Further, the ANS description will be incorporated into the Plan by May 4, 1984.

6.3 News Media

The area of news media training was reviewed with respect to the requirements of 10 CFR 50.47(b)(7); and criteria in NUREG-0654, Section II.G.

The NRC inspector discussed the LP&L plans to familiarize the news media in accordance with the Waterford 3 Plan and EPIPs with the communications manager. The LP&L plans in this area appear to be complete and adequate as stated. The first LP&L media seminar was held on May 18, 1983. Their attendance sign-in sheet indicated that it was attended by area news media representatives. LP&L will conduct the media seminars annually according to the communications manager.

(Closed) Open Item (382/8308-117): An annual media seminar had been developed and implemented. The applicant's response appeared to be adequate.

7.0 DRILLS, EXERCISES, AND WALK-THROUGHS

7.1 Program Implementation

The applicant's program for drills and exercises had been implemented under the cognizance of the emergency planning coordinator. The NRC inspector reviewed the results of functional drills and exercises performed in 1983 and 1984 and determined that these drills had been performed in accordance with Procedure EP-3-020, "Emergency Preparedness Drills and Exercises." Deficiencies identified during the drills had been identified and corrective action responsibility had been assigned to the cognizant staff member. Drill-identified improvement items had been reviewed and incorporated into the applicable procedures as appropriate.

7.2 Walk-Through Observations

7.2.1 Emergency Detection

(Open) Open Item (382/8308-118): The control room operators and shift supervisors must demonstrate the ability to utilize the radiation monitoring instrumentation for the detection and assessment of emergency conditions. This item remains open pending the completion of the preoperational testing and acceptance by the applicant of the radiation monitoring system which had been scheduled for April 1, 1984. Upon system completion, actual hands-on training by control room personnel should be completed.

7.2.2 Emergency Classification

This portion of the applicant's program had been determined to be adequate during the previous inspection with no open items identified.

7.2.3 Notification

(Closed) Open Item (382/8308-119): The NRC inspector examined the training records of station personnel that were assigned communications responsibilities during implementation of the Plan. Applicable personnel were found to have been trained in the communication and notification training course. Discussions with training personnel identified that hands-on training demonstrations, using the plant communications equipment, were part of the classroom sessions. Additional hands-on training had been received during facility drills. The applicant's response appeared to be adequate.

7.2.4 Dose Calculations

(Closed) Open Item (382/8308-121): The NRC inspector interviewed selected individuals in the control room (station technical assistants and control room shift supervisors) responsible for performing initial dose assessment and reviewed training documentation for these individuals. The NRC inspector found that these individuals were adequately trained to perform this function. The applicant's response appeared to be adequate.

(Closed) Open Item (382/8308-122): The NRC inspector reviewed selected essential emergency preparedness documentation in the control room and reviewed NSI-452, "Emergency Facilities and Equipment Readiness." The NRC inspector determined that the necessary maps and overlays for dose calculations were in the control room and that NSI-452 provided for their control and inventory on a monthly basis. The applicant's response appeared to be adequate.

The following deficiency must be corrected in order to achieve an acceptable program:

(Open) Open Item (382/8308-120): This item remains open pending completion of acceptance testing and operation of the post-accident area radiation monitor and process radiation monitor systems. The shift supervisors were not given a walk-through due to instrumentation not being installed.

7.2.5 Post-Accident Sampling and Analysis

The NRC inspector spoke with station chemistry department personnel concerning technician training on the PASS. The applicant had not initiated training on the PASS as of this inspection date; therefore, no walk-throughs on this system were performed.

The responsibility for this area has been transferred to the Facilities Radiation Protection Section, Region IV. This area will be addressed following their future inspections.

7.2.6 Containment Air Sampling and Analysis

The NRC inspector spoke with station chemistry department personnel concerning technician training on the PASS. The applicant had not initiated training on the PASS as of this inspection date; therefore, no walk-throughs on this system were performed.

The responsibility for this area has been transferred to the Facilities Radiation Protection Section, Region IV. This area will be addressed following their future inspections.

7.2.7 In-Plant Sampling and Analysis

The NRC inspector spoke with station chemistry department personnel concerning technician training on the PASS. The applicant had not initiated training on the PASS as of this inspection date; therefore, no walk-throughs on this system were performed.

The responsibility for this area has been transferred to the Facilities Radiation Protection Section, Region IV. This area will be addressed following their future inspections.

7.2.8 Offsite Environmental Sampling and Analysis

This portion of the applicant's program had been found to be adequate during the previous inspection with no open items identified.

7.2.9 Protective Action Decisionmaking

The NRC inspector walked through a protective action decisionmaking scenario with four different groups of shift supervisors, control room supervisors and shift technical advisors. Due to the large number of procedure changes in the Plan and EPIPS, walk-through training had been conducted by the applicant on January 4 and 6, 1984, for these personnel. It was evident during the walk-throughs conducted by the NRC inspector that the personnel had been familiarized with the procedures but were not proficient in the use of the procedures. Additional training would be beneficial in assuring a proficient process by which dose projections are transformed into protective action recommendations to offsite agencies by control room personnel.

Improvements in the following area should be considered:

(Open) Open Item (382/8402-07): Additional walk-throughs with control room personnel (shift supervisors, control room supervisors, and shift technical advisors) should be performed in order to improve the proficiency in determining protective action recommendations using Procedures EP-2-050, EP-2-051, and EO-2-052.

8.0 EXIT MEETING

On February 10, 1984, at the conclusion of the onsite followup appraisal (Report 50-382/84-02) and the emergency preparedness exercise (Report 50-382/84-10), the NRC inspection team, along with Mr. J. B. Baird, Chief, Emergency Response and Preparedness Staff, Mr. Les Constable, NRC senior resident inspector, and Mr. Tracy Flippo, NRC resident inspector, met with Mr. R. S. Leddick, senior vice president-nuclear operations, and his staff. Mr. C. A. Hackney, the team leader, discussed status of the March 1983 appraisal report findings, specifically, the Appendix A, Appendix B, and Appendix C items. In addition, the team leader discussed the followup appraisal findings. The applicant's representatives were also given the status of the Plan findings and instructions relating to transmitting the Plan changes to the NRC.

The applicant's management acknowledged the appraisal findings and indicated that they wanted to provide an adequate response to the findings as soon as possible.

9.0 PERSONS CONTACTED

9.1 LP&L Employees

NAME	TITLE
Allan, R.	Chemistry Engineer
Alleman, S.	Assistant Plant Manager-Plant Technical Services
Azzarello, R.	Nuclear Services
Backes, P.	Emergency Planning Manager
Barkhurst, R.	Plant Manager-Nuclear
Benjamin, E.	Plant Administrative Office Supervisor
Booher, R.	Control Room Supervisor
Briggs, D.	Health Physics Technician
Brown, T.	Control Room Supervisor
Canavier, H.	Maintenance Supervisor
Carns, N.	Completion Manager
Conklin, C.	Senior Planner/Trainer
Cross, W.	Consultant (Southern Technical Services)
Dussony, R.	Instrument and Control Technician
Dauzat, L.	Senior Health Physics Technician
Davie, G.	Shift Supervisor
Day, W.	Shift Technical Advisor
Dussony, R.	Instrument and Controls Technician
Edwards, J.	Shift Supervisor
Ellard, J.	Shift Supervisor
Espenan, D.	Health Physics Administrative Supervisor
Fields, J.	Security Supervisor
Fort, J.	Public Information Manager
Funk, J.	Health Physics Supervisor-Operations
Groome, C.	Licensing Engineer
Hanemann, J.	Public Information Representative
Hawkins, C.	Chemistry Superintendent
Hayes, O.	Operations Superintendent
Jackson, P.	Electric Engineer, Project Engineer Group
Johnson, K.	Operations Quality Assurance
Johnson, S.	Shift Technical Advisor
Jones, M.	Control Room Supervisor
Kenning, R.	Radiation Protection Superintendent
Labry, J.	Auxiliary Operator
Laughlin, L.	Shift Technical Advisor
Leddick, R.	Senior Vice President-Nuclear Operations
Lee, R.	Associate Engineer
Lewis, J.	Utility Engineer
Lubinski, S.	Utility Engineer, Emergency Planning Group
McCann, J.	Control Room Supervisor
Marler, M.	Senior Health Physics Technician
Mills, M.	Emergency Planning Clerk

Morgan, W.	Nuclear Operations Quality Assurance Manager
O'Hern, J.	Training Superintendent 1-Nuclear
Packer, C.	Project Files Supervisor
Pandolfo, J.	Computer Specialist
Payne, T.	Assistant Supervisor Instrument & Control
Perks, W.	Station Technical Assistant Superintendent
Prasankumar, P.	Maintenance Superintendent
Pratt, M.	Instrument and Control Technician
Rocco, B.	Effluent and Environmental Coordinator
Redhead, R.	Director of Public Relations
Rodrigue, S.	Chemistry Technician
Smith, W.	Shift Supervisor
Storz, L.	Manager, Operations & Maintenance
Timmons, R.	Nuclear Auxiliary Operator
Toth, C.	Training Superintendent, Technical Training
Vanderhorst, M.	Health Physics Technician

9.2 Other Organizations

NAME	TITLE
Madere, B.	Civil Defense Director, St. John the Baptist Parish

9.3 NRC Resident Inspectors

NAME	TITLE
Constable, L.	Senior Resident Inspector
Flippo, T.	Resident Inspector

9.4 Entrance Meeting Attendees

NAME	TITLE
Alleman, S.	Assistant Plant Manager-Plant Technical Services, LP&L
Backes, P.	Emergency Planning Manager, LP&L
Cook, K.	Nuclear Support and Licensing Manager, LP&L
Drummond, F.	Nuclear Services Manager, LP&L
Flippo, T.	Resident Inspector, NRC Region IV
Gerrets, T.	Quality Assurance Manager, LP&L
Hackney, C.	Emergency Preparedness Analyst, NRC Region IV
Herrington, W.	Research Scientist, Pacific Northwest Laboratories
Higby, D.	Research Scientist, Pacific Northwest Laboratories
Langan, M.	General Training Supervisor, LP&L
Leddick, R.	Senior Vice President-Nuclear Operations, LP&L
Lewis, J.	Utility Engineer, LP&L
Malmros, M.	Program Manager, Comex Corporation
O'Hern, J.	Training Superintendent 1-Nuclear, LP&L
Packer, D.	Training Manager-Nuclear, LP&L
Perrotti, D.	Emergency Preparedness Specialist, NRC IE:HQ
Roberts, A.	Operations Quality Assurance Engineer, LP&L
Sleger, J.	Executive Assistant, LP&L
Storz, L.	Manager, Operations & Maintenance, LP&L
Woods, J.	Plant Quality Manager, LP&L

9.5 Exit Meeting Attendees

NAME	TITLE
Alleman, S.	Assistant Plant Manager-Plant Technical Services, LP&L
Azzarello, R.	Nuclear Services, LP&L
Backes, P.	Emergency Planning Manager, LP&L
Baird, J.	Chief, Emergency Response & Preparedness Staff, NRC Region IV
Barkhurst, R.	Plant Manager-Nuclear, LP&L
Brown, P.	Executive, Comex Corporation
Constable, L.	Senior Resident Inspector, NRC Region IV
Cook, K.	Nuclear Support and Licensing Manager, LP&L
Dobson, D.	Project Manager, LP&L
Drummond, F.	Nuclear Service Manager, LP&L
Englebracht, F.	Plant Administration Services Manager, LP&L
Flippo, T.	Resident Inspector, NRC Region IV
Gerrets, T.	Quality Assurance Manager, LP&L
Hackney, C.	Emergency Preparedness Analyst, NRC Region IV
Herrington, W.	Research Scientist, Pacific Northwest Laboratories
Higby, D.	Research Scientist, Pacific Northwest Laboratories
Johnson, K.	Operations Quality Assurance, LP&L
Knowles, D.	Vice President, Division Operations, LP&L
Leddick, R.	Senior Vice President-Nuclear Operations, LP&L
Lewis, J.	Utility Engineer, LP&L
Loposer, A.	Research Scientist, Comex Corporation
Malmros, M..	Program Manager, Comex Corporation
Morgan, W.	Nuclear Operations Quality Assurance Manager, LP&L
Nelson, R.	Licensing Manager, LP&L
O'Hern, J.	Training Superintendent 1-Nuclear, LP&L
Packer, D.	Training Manager-Nuclear, LP&L
Perrotti, D.	Emergency Preparedness Specialist, NRC IE:HQ
Perry, R.	Emergency Planning, LP&L
Ridgway, D.	Attorney, Shaw, Pittman
Wilson, J.	Project Manager, NRC NRR:HQ
Woods, J.	Plant Quality Manager, LP&L

ATTACHMENT 1

EVALUATION OF THE WATERFORD 3 EMERGENCY PLAN

1.0 INTRODUCTION

Evaluation by the NRC of the state of emergency preparedness associated with the Waterford 3 Steam Electric Station involves the review of Louisiana Power and Light Company's (LP&L) emergency preparedness and the Federal Emergency Management Agency's findings on state and local radiological emergency preparedness. This evaluation addresses LP&L's emergency preparedness. The Waterford 3 Emergency Plan (the Plan), Revision 4 was the subject of a review during the emergency preparedness implementation appraisal (EPIA) conducted by the NRC during the period February 22 - March 4, 1983. The NRC inspector's comments were included in Attachment 1 to NRC Report 50-382/83-08, dated May 27, 1983. On July 29, 1983, and August 30, 1983, the applicant responded to the NRC inspector's comments regarding the changes. Revision 5 to the Plan was received by the NRC in January 1984 and the applicant submitted Revision 6 to the Plan on January 30, 1984. These two revisions addressed most of the NRC inspector's comments identified in NRC Report 50-382/83-08. As a result, the following open items are closed:

(Open) Open Item (382/8308-123)
(Open) Open Item (382/8308-124)
(Open) Open Item (382/8308-125)
(Open) Open Item (382/8308-127)
(Open) Open Item (382/8308-128)
(Open) Open Item (382/8308-129)
(Open) Open Item (382/8308-130)
(Open) Open Item (382/8308-132)
(Open) Open Item (382/8308-133)
(Open) Open Item (382/8308-134)
(Open) Open Item (382/8308-135)
(Open) Open Item (382/8308-136)
(Open) Open Item (382/8308-137)

The Plan, Revision 6, January 30, 1984, was the subject of review during this EPIA followup. Major changes occurred to Section 5, "Emergency Organization," of the Plan in Revision 6. The Plan was reviewed against the requirements of 10 CFR 50 and the guidance criteria of NUREG-0654, Revision 1, November 1980. Staff comments pertaining to Revision 6 are addressed in Section 2 of this attachment. Section 2 also includes those NRC inspector comments (Open Items 382/8308-126 and 382/8308-131) that were previously identified but had not yet been satisfactorily addressed by the applicant. Each item addressed in Section 2 was discussed with the applicant during the EPIA followup. Each section of the Plan is addressed and the staff's comments are followed, in parenthesis, by the applicable guidance criteria of NUREG-0654 or the requirement specified in 10 CFR Part 50 subsequent to the followup EPIA. On February 21, 1984, the applicant responded to the NRC inspector's comments in Section 2 of this attachment and committed to make the Plan changes by May 4, 1984. The staff has reviewed the applicant's response of February 21, 1984. Section 2.1 describes those Plan items for which an acceptable response (commitment) has been made. Section 2.2 contains those Plan items for which an acceptable response has not been made. The staff's conclusions are provided in Section 3.0 of this attachment.

2.0 DISCUSSION

2.1 Plan items for which an acceptable response has been made.

Section 1: Glossary

- Clarify the definitions for clean area and contaminated area and add definitions for emergency coordinator, duty emergency operations facility director, and duty plant manager. Include CCW, CVCS, RCS, and SIS in the abbreviations listing. (NUREG-0654, Section II.P.4)

Section 2: Scope

- Add the Federal Emergency Management Agency to the list of offsite organizations having emergency responsibilities in Section 2.5.f of the Plan. (NUREG-0654, Section II.A.1)

- Provide an enlarged, clearer map of the Waterford 3 site in Figure 2.2a of the Plan. (NUREG-0654, Section II.P.4)

Section 3: Summary

- Clarify Section 3.4 (page 3-6) of the Plan regarding the coordination and correction of emergency planning deficiencies identified by the applicant. (NUREG-0654, Section II.P.9)

Section 4: Classification

No comments

Section 5: Organization

- Clarify Section 5.1.2.1 regarding the reference to Section 7.1.1 and the operating shift personnel. (NUREG-0654, Section II.P.4)

- (Closed) Open Item (382/8308-126) - Clarify Section 5.1.2.1.a (page 5-3) regarding the duty plant manager relieving the shift supervisor as the emergency coordinator. Amend Sections 5.1.2.2 (page 5-8) and 6.6.1.2 such that when the emergency operation facility is activated and ready for turnover, the responsibility for notifying offsite authorities and making protective action recommendations is transferred from the emergency coordinator to the emergency operation facility director in a clear, unambiguous manner. (NUREG-0654, Sections II.B.3 & 4)

- Clarify the location of the shift technical advisor in Section 5.1.2.1.C. (NUREG-0654, Section II.B.5)

- Clarify Section 5.1.2.1.1 regarding other station personnel supplementing the onshift emergency fire team. (NUREG-0654, Section II.B.5)

- In Section 5.1.2.2.k (page 5-12), clarify the identity of the field monitoring teams. (NUREG-0654, Section II.B.5)

- Provide an LP&L organization chart similar to that which was previously included in Revision 4 to the Plan, Figure 5-1. (NUREG-0654, Section II.A.1)

- Revise Table 5-1 of the Plan to incorporate additional augmentation capability for one nuclear engineer for core/thermal hydraulics at 30 minutes and five health physics technicians (three at 30 min. and two at 60 min.) for in-plant protective actions. (NUREG-0654, Section II.B.5)

- Revise Table 5-1 so as to be consistent with Table 5-4 regarding the assignment of the nuclear auxiliary operator as the onshift emergency communicator. (NUREG-0654, Section II.B.5)

- Clarify Table 5-3 of the Plan with regard to responsibilities assigned for coordination with offsite law enforcement officials and coordination with offsite officials. (NUREG-0654, Section II.C.1)

- In Table 5-4 of the Plan provide for prioritization of assignments for those team members who are assigned to multiple emergency teams. (NUREG-0654, Section II.B.5)

Section 6: Emergency Response Measures

- The industrial hot line should be included in Section 6.1.1 of the Plan as a means for recognizing an emergency situation; i.e., offsite chemical emergency affecting Waterford 3. (NUREG-0654, Section II.D.4)

- Section 6.2.2.6.f should be clarified with regard to coordination of field monitoring data from the state fixed facility response team and LP&L field monitoring teams. (NUREG-0654, Section II.H.12)

- Clarify Section 6.4.1.1 of the Plan with regard to the number of personnel on radiological monitoring teams; capability for measurement of radioiodines as low as 1E-7 mci/cc; and estimated deployment times and equipment to be used by field monitoring teams. (NUREG-0654, Sections II.I.8 and 9)

Section 7: Emergency Response Facilities and Equipment

- Identify in Figure 7-5 additional space for the NRC for conferences, interviews, etc. (NUREG-0654, Section II.H.2 and NUREG-0696, Section 4.4)

- Clarify Table 7-10 (page 7-32) with regard to the individual performing the function of communicator. (NUREG-0654, Section II.B.5)

Section 8: Maintenance of Emergency Preparedness

- The training and exercise frequencies described in Section 8 should be clarified and made consistent with UNT-3-009; e.g., annual: 12 months + 3 months. (NUREG-0654, Sections II.N and O)

- Clarify Section 8.1.1.4 (Items 8-12) to indicate that these agencies will be trained on an annual basis. (NUREG-0654, Section II.O.1)

- Clarify Section 8.1.2.6 regarding the timing of submittals of exercise advance information to official federal observers. (NUREG-0654, Section II.N.3, NRC, Region IV letter dated January 9, 1984.

- Include the transient population in Section 8.2. (NUREG-0654, Sections II.G.1 and 2)

Section 9: Recovery

No comments

Appendix A: Update and verify as current the mutual assistance plan. (NUREG-0654, Sections II.C.4 and P.4)

Appendix B: No comments

Appendix C: Complete and submit for staff review the details of communications procedures committed to in letters of agreement with U.S. Coast Guard, August 15, 1983, and Missouri Pacific Railroad, November 1, 1978 (verified May 17, 1983). (NUREG-0654, Sections II.A.3 and P.4)

Appendix D: No comments

Appendix E: No comments

Appendix F: No comments

Appendix G: Include anticontamination clothing and respiratory equipment in the equipment list for the field monitoring kits. (10 CFR 50.47.(b)(11))

Appendix H: No comments

Appendix I: No comments

2.2 Plan items for which an acceptable response has not been made.

Section 5: Organization

- In Section 5.1.2.2.c (page 5-9), identify the health physics to NRC communicator. (NUREG-0654, Section II.B.5)

- In Section 5.1.2.2.1 (page 5-12), identify the organizations referred to as "non-LP&L agencies." (NUREG-0654, Section II.A.1)

Section 6: Emergency Response Measures

- Clarify the priority of shift supervisor duties in Section 6.1.3. (NUREG-0654, Section II.B.2)

- Expand and strengthen the description of site evacuation and accountability in Section 6.6.1.1 so as to ensure evacuation and access control of all nonessential persons on plant property in the event of a site evacuation. (NUREG-0654, Sections II.J.4 and 5)

- (Open) Open Item (382/8308-131): Utilize the guidance of IE Information Notice No. 83-28, dated May 4, 1983, in developing protective action recommendations during general emergencies based on core/containment conditions during a General Emergency.

- Provide additional information on the tone-alert receivers described in Section 6.8.1.1 of the Plan. (NUREG-0654, Section II.E.6)

- Provide a copy of the arrangements for helicopter support for the staff's review as described in Section 6.8.1.1. If appropriate, provide a reference to the offsite plans which provide for this support. (NUREG-0654, Section II.E.6)

Section 8: Maintenance of Emergency Preparedness

- Clarify Section 8.1.2.4.2 regarding communication tests of the emergency notification system/health physics network between the control room, technical support center, emergency operations facility, and the NRC Headquarters and regional operation centers on a monthly basis. (10 CFR 50, Appendix E, IV.E.9.d)

- Clarify Section 8.5 regarding the coordination of the review/audit of the emergency preparedness program between the quality assurance section and the emergency planning coordinator. (NUREG-0654, Section II.P.9)

3.0 CONCLUSIONS

Based on a review of Revision 6 to the Plan and the applicant's commitments expressed in correspondence dated February 21, 1984, the staff concludes that, subject to satisfactory completion of the Plan changes committed to by the applicant and resolution of those items identified in Section 2.2 above, the Plan meets the requirements of 10 CFR 50 and NUREG-0654, Revision 1, November 1980.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

March 28, 1984

MEMORANDUM FOR: Richard W. Krimm
Assistant Associate Director
Office of Natural and Technological Hazards Program
Federal Emergency Management Agency

FROM: Edward L. Jordan, Director
Division of Emergency Preparedness
and Engineering Response
Office of Inspection and Enforcement

SUBJECT: FEMA SUPPLEMENTAL FINDINGS ON WATERFORD 3

Your letter dated February 7, 1984 forwarded FEMA's Interim Finding on Waterford 3. The Region VI report does not specifically address certain offsite planning issues requiring resolution prior to issuance of a full-power operating license as specified in the Atomic Safety and Licensing Board's Partial Initial Decision of November 3, 1982, as amended by its Memorandum and Order dated December 14, 1982.

The issues specified by the Board are as follows:

1. The Parish Plans shall designate by title the LP&L official at the EOF who will have the authority or responsibility to provide protective action recommendations to offsite authorities.

2. Letters of agreement with the support parishes, agencies or political subdivisions of the support parishes, or with other responsible entities, for vehicles and drivers necessary to implement the evacuation plans shall be completed and submitted to the NRC Staff.

3. The Parish Plans shall be amended to specify the vehicles allotted to evacuate prisoners. These vehicles shall have a combined capacity to evacuate the prison population. The plans shall also specify the personnel commitment for drivers and guards. Furthermore, the plans shall clearly indicate that the personnel designated as drivers or guards will have no other emergency duties and the allotted vehicles shall have no other emergency function until after prisoner evacuation is accomplished.

4. Pick-up point information shall be included in the EBS evacuation messages.

CONTACT: Donald J. Perrotti, IE
492-487[illegible]

It is requested that FEMA provide supplemental findings documenting the degree to which each of the above listed items is met along with a schedule for resolution of those that have not been fully satisfied. In order to preclude impacting the licensing schedule, the requested information and findings should be provided by April 15, 1984.

Edward L. Jordan, Director
Division of Emergency Preparedness
and Engineering Response
Office of Inspection and Enforcement

cc: J. N. Grace, IE
S. A. Schwartz, IE
F. G. Pagano, IE
D. B. Matthews, IE
C. R. Van Niel, IE
F. Kantor, IE
D. J. Perrotti, IE
J. Wilson, NRR
R. Bangart, Region IV
C. Hackney, Region IV
S. Turk, OELD

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MAR 12 1984

Federal Emergency Management Agency

Region I J.W. McCormack Post Office and Court House
Boston, Massachusetts 02109

March 8, 1984

Sherwin E. Turk, Esquire
Office of the Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

RE: Matter of Louisiana Power and Light Co, et al
(Waterford Steam Electric Generating Station, Unit 3)

Dear Mr. Turk:

The revised public information brochure for the Waterford emergency planing zone was recently provided to the Federal Emergency Management Agency (FEMA) Region VI office for review. The FEMA staff reviewed the revised brochure against the Atomic Safety and Licensing Board's Partial Initial Decision of May 26, 1983, to insure that the representations made by the applicant and requirements established by the Board were incorporated into the revised brochure.

A copy of their review is attached.

Sincerely,

BRIAN P. CASSIDY
Regional Counsel

cc Albert L. Lookabaugh, Region VI

Federal Emergency Management Agency

Region VI, Federal Center, 800 North Loop 288
Denton, Texas 76201-3698

February 16, 1984

MEMORANDUM FOR: BRIAN P. CASSIDY
Regional Counsel
Region I

FROM: Albert L. Lookabaugh, Chief
Technological Hazards Branch

THROUGH: R. Dell Greer, Chief
Natural and Technological Hazards Division

SUBJECT: Review of the Final Draft Waterford III Public Information Brochure

A copy of the revised public information brochure (PIB) for the Waterford Steam Electric Station, Unit 3, has been forwarded to Region VI for review. In the Matter of Louisiana Power and Light Company, the Atomic Safety and Licensing Board's (ASLB) partial initial decision of May 26, 1983, 17 N.R.C. ____ (1983), the ASLB recommended certain changes and/or modifications to the revised brochure (Slip op., Section III, Paragraph 6 at p. 9-11). Our review indicates that all of the recommended changes and/or modifications have been incorporated into the revised PIB.

The specific changes are:

Paragraph 6 a. - The first paragraph has been eliminated in Section 5 following the subheading "Locate Your Children's Reception Center."

b. - The words "School" has been deleted from the "chart for the 16 sections around Waterford 3." The heading now reads, "Pickup Points."

c. - Pickup points have been identified on the map with numbers inside triangles. The black and white map identifies all of the pickup points. The colored overlay map which still has the dots, does not have pickup points to correspond with number 41 in Section B3 and numbers 63 and 65 in Section D3.

Since all of the triangles are shown correctly on the black and white map, this probably does not pose a problem, but just should be a reminder that final product must have all of the pickup points shown in proper locations.

The next to the last sentence in Section 4 under the main heading "What To Do If You Are Told To Evacuate" has been replaced by sentences reading that "Each pickup point in the chart has a number. To locate a pickup point on the map, look for the triangle with the number on it. Choose the pickup point closest to your home."

d. - The section headed "What Radiation Is" and the following section headed "Radiation Emergencies" have been moved to the far left of the folded page on which they appear.

e. - The size of the type for the main heading "Emergency Action Plans" has been increased in size to emphasize that it is the main heading for the successive sections.

f. - The type of the panel's heading "What To Do If You Hear The Outdoor Sirens" has been enlarged to the increased size of the heading "Emergency Action Plans."

g. - The size of the type for the main heading "What Are The Actions You Might Need To Take" has been enlarged. In addition, the word "ACTIONS" has been capitalized and in a bolder face type.

h. - In two separate locations in the brochure (immediately following the listing of radio and T.V. stations) the statement "Follow The Directions Given Even If They Differ From Those In This Booklet" is shown in bold lettering.

There has been a modification to the method of distribution of the PIB's. Through contacts with the State, local and utility representatives, the Region has been advised the method of distribution will be as follows: as soon as the brochure has been approved and printed, LP&L will mail a copy to every customer in the 10-mile EPZ (covers all residence and commercial interests). In addition, bulk distribution will be made by LP&L to the local Civil Defense Officials who, in cooperation with local parish personnel, will distribute copies to hospitals, industries, hotels, motels, libraries and other public areas. In addition, posters will be developed and made available for display in indoor public areas. Also, information will be contained in the local telephone directories.

Subsequent to the ASLB decision, two other issues have arisen. One is that NRC wants the rumor control telephone numbers of the utility to be shown in the brochure. NUREG-0654, Planning Standard G. 4. c. states that "Each organization shall establish coordinated arrangements for dealing with rumors." In reviewing FEMA's guidance and instructions, I can find no requirement that the numbers be shown in this brochure. I would not object, however, to them being included, except it may conflict with information that states "Do Not Use Phone" located under the heading "What To Do If You Hear The Outdoor Sirens." Also, there is another paragraph in the brochure entitled, "Should You Use The Phone?" with instructions not to use the phone unless you or someone you know is injured or too sick to do what is needed. These restrictions for the public not to use the phone could be confusing if rumor control phone numbers are added to the brochure.

The other area of concern is that the map does not show the Luling Bridge (recently completed and opened). Through my contacts, I have determined that the bridge will be shown on the map in the brochure. Also, through my contacts, I have determined that the local governments do not want to use the bridge to evacuate people. The procedures and routes for evacuation now developed are sufficient. The Parishes do not want a traffic jam at the bridge and do not plan to route people across the river. I certainly support their decision and believe it is the correct way to handle the situation. I agree that the bridge should be shown on the map so that the public knows that this map is up-to-date but defer to the local governments decision not to show the bridge as an evacuation route.

Federal Emergency Management Agency

Washington, D.C. 20472

FEB 7 1984

MEMORANDUM FOR: Edward L. Jordan
Director
Division of Emergency Preparedness
and Engineering Response
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission

FROM: Richard W. Krimm
Assistant Associate Director
Office of Natural and Technological
Hazards Programs

SUBJECT: Interim Finding on Waterford III Steam Electric Station

The Federal Emergency Management Agency (FEMA) transmits to the Nuclear Regulatory Commission (NRC) the attached Interim Finding on Waterford III Steam Electric Station dated September 16, 1983, an addendum to the Interim Finding dated December 27, 1983, and comments on the E.L. Quarantelli Report entitled: "Evacuation Behavior: Case Study of the Taft Louisiana Chemical Tank Explosion Incident."

These attachments include a response to the concerns raised by the St. John the Baptist Parish Civil Defense Director as requested in your memorandum of March 25, 1983.

FEMA Region VI staff and the State of Louisiana are continuing discussions on several unresolved elements. When a resolution to these issues has been reached, an addendum will be forwarded to your office. Based on the Region VI review of the Louisiana and St. John the Baptist and St. Charles Parishes' off-site radiological emergency preparedness plans, there is reasonable assurance that the plans are adequate and capable of being implemented in the event of an accident at the site. An exercise to test these plans is scheduled for February 8, 1984. A finding on preparedness will be made following this exercise.

Attachements
As Stated

(16)

Federal Emergency Management Agency

Region VI, Federal Center, 800 North Loop 288
Denton, Texas 76201-3698

January 17, 1984

MEMORANDUM FOR: RICHARD W. KRIMM, ASSISTANT ASSOCIATE DIRECTOR
Office of Natural and Technological Hazards

ATTENTION: Gloria Joyner, Program Specialist

FROM: R. Dell Greer, Chief
Natural and Technological Hazards Division

SUBJECT: Interim Findings for Waterford III
(Report of Professor E. L. Quarantelli entitled: "Evacuation Behavior: Case Study of the Taft Louisiana Chemical Tank Explosion Incident")

The attached review is to be included in previous submissions to complete the interim findings for Waterford III.

Region VI, at this time, sees no need to make any recommendations to Louisiana for plan changes around the Waterford III site due to the comments made in the Quarantelli report. Many of the problems sited in the report were covered by changes made to the plans since the Quarantelli report was made. Also problems will be eliminated due to the installation of the A/N system that has been completed since the report was made.

Region VI will be making a complete evaluation of the plans and the preparedness of the State and local parishes around Waterford III in the upcoming exercise to be held on February 8, 1984.

A complete exercise report on the Waterford III Exercise will be prepared and furnished to FEMA National as soon as possible after February 8, 1984.

Review of E. L. Quarantelli's final report of the Evacuation Behavior: Case Study of the Taft, Louisiana, Chemical Tank Expolsion Incident.

Throughout the report are discussions of the activities of the local emergency organizations, particularly their involvement in the large-scale evacuation that occurred as a result of the chemical explosion.

We have limited our response to Section VII of the report, "An Assessment of Actions in the Incident," since we feel this covers the major discussion items made throughout the report.

VII. An Assessment of Actions in the Incident

1. How well-prepared were the organizations and the community for the incident that occurred?

Discussion: The Quarantelli report states that for this locality, "There was better than average preparations." Therefore, we will not comment on this section except that FEMA will be evaluating the preparedness of the State and local parishes during the waterford exercise to be held on February 8, 1984, and will furnish a complete report of the exercise as soon as possible after its completion.

2. How well did the community and the organization learn about the threat?

Discussion: In the event that an accident happens at Waterford III, the public will be alerted by a siren system (now installed and operating, not officially tested) that covers the 10-mile EPZ. The sirens will be controlled and operated by parish emergency preparedness officials. Some fringe areas will be alerted by portable sirens and other means. A Public Information Brochure will be distributed to the public prior to the plant becoming operational. This brochure will describe to the public that if the siren system is sounded they are to listen to certain radio and T.V. stations for instructions on what actions they are to take. There are also direct communication link-ups between the utility, local and State emergency operating centers so that information on the conditions at the utility can be passed to the decisionmakers and then on to the public for actions to either evacuate the area, take shelter or other procedures.

3. How well was the evacuation organized?

Discussion: As previously mentioned, the Public Information Brochure will have a map showing evacuation routes that people living in certain sections are to follow to a known reception center. Also they are told to listen to Radio and T.V. stations for additional information on evacuation procedures to follow. This PIB was not in the hands of the public during this evacuation. In addition, prewritten notification messages and public information materials have been developed for the parish emergency plans. These messages specify the personal items that the public are to take with them, procedures to follow, and information about the reception centers to go to if told to evacuate. This information will be repeated regularly over the Emergency Broadcast System (EBS) radio and T.V. stations.

4. How well were evacuees sheltered?

Discussion: The plans developed for Waterford call for reception centers (already pre-selected and identified) to be located outside the 10-mile EPZ. These centers will be managed by emergency personnel of the parishes in which the centers are located. This should remove the only minor problem mentioned in the Quarantelli report that "the management of the shelters was criticized by some persons." The Quarantelli report had no major problems with this section of the evaluation; therefore, no further discussion will be offered on this.

5. How well handled was the return to normal?

Discussion: There are several points made in the Quarantelli report under this heading. One was the need for non-routine interaction among several key organizations and key decisionmakers at the plant. The emergency plans for Waterford already specify a precise network of communications between the State, local parishes, and the utility. The type of information to be passed and the responsible decisionmakers have been identified in advance, and technical support to the EOC is through established procedures.

Convergence at the local EOC's and dealing with the mass media personnel were additional problems.

In the future, security personnel will be stationed at the EOC's to allow entry to only those personnel who have proper identification. The waterford plans have an established method to cover the mass media situation; however, this procedure has not been tested as yet.

Federal Emergency Management Agency

Region VI, Federal Center, 800 North Loop 288
Denton, Texas 76201-3698

December 27, 1983

MEMORANDUM FOR: DAVE McLOUGHLIN, Deputy Associate Director
State and Local Programs and Support

ATTENTION: Gloria Joyner, Program Specialist
State and Local Programs and Support
Natural and Technological Hazards Division

FROM: for Jerry Stephens, Regional Director

SUBJECT: Addendum to Interim Findings on Waterford III Steam Electric Station

An interim finding on Waterford III Steam Electric Station was submitted to FEMA Headquarters on September 16, 1983. The plan review discovered that there were still remaining elements that proved to be inadequate or that needed further explanation. To resolve those remaining deficiencies, FEMA Region VI held a meeting November 8, 1983, in Dallas, Texas, with representatives from the State of Louisiana. Also in attendance were representatives from Louisiana Power and Light Company (LP&L), Argonne Lab, and Region VI RAC.

Attachment I provides a list of those unresolved elements that were specifically discussed at the November 8, 1983, meeting and progress made on resolving those elements. As noted, several of the elements have since been resolved while the remaining ones have been agreed upon but resolution not yet completed.

Attachment II is the formal submittal of the State of Louisiana comments to the Consolidated RAC Review (Interim Finding dated September 16, 1983) and also a response to concerns and resolutions pertaining to St. John Parish. FEMA Region VI is satisfied that all concerns pertaining to St. John Parish have been resolved.

You should note that the State of Louisiana included additional information and clarification on the following elements which were previously evaluated as adequate by FEMA Region VI. Those elements are as follows: A.1.d., C.2.a., D.4., F.1.d., G.1., G.4.a., H.10., I.8., J.10.i., J.10.1., J.12., K.4., O.1., P.3., P.8.

Also, please be advised that my staff is in the process of developing a written response pertaining to the Quarantelli Report per your memo dated November 23, 1983. Those comments will be forthcoming as soon as possible.

We will continue to maintain close liaison with the State of Louisiana to ensure that the remaining elements are completed to our satisfaction and will notify FEMA National accordingly.

Should you have any questions pertaining to this information, please contact Mr. Al Lookabaugh, Chief, Technological Hazards Branch.

Attachments

ATTACHMENT II

November 16, 1983

Mr. Al Lookabaugh
FEMA, Region VI
800 N. Loop 288
Denton, Texas 76201-3698

Dear Mr. Lookabaugh:

Subsequent to the meeting held on November 8, 1983, enclosed is the formal submittal of the State of Louisiana comments to the Consolidated RAC Review of the Louisiana Peacetime Radiological Response Plan, Revision 4, and Attachment 1. A few of the items discussed at the meeting remain open or are awaiting completion. Please find enclosed, in **bold print,** the items identified during the meeting which require changes to the State Plan or Attachment 1.

Also enclosed, is our response to your Attachment 1 of the Consolidated RAC Review dated September 28, 1983, St. John the Baptist Parish Concerns and Resolutions.

If there are any questions or further information needed, please contact Mr. Thomas Laiche at the address shown below.

Sincerely,

William H. Spell

WHS:TL:st

Enclosures

12

RESPONSE TO RAC REVIEW COMMENTS OF SEPTEMBER 28, 1983

A.1.d The Director of the Bureau of Emergency Medical Services is identified in the Department of Health and Human Resources, Office of Hospitals, Bureau of EMS Implementing Procedures.

A.2.a Key state individuals are specified in the state Implementing Procedures (IP's).

Key parish individuals are specified in the parish Implementing Procedures (IP's). **A cross reference will be added to the State Plan to indicate this.**

A.3 DOE and FEMA are specified as the lead agencies in the state plan. Support from other agencies will be coordinated through these agencies.

A list of Letters of Agreement will be added to the Plan. Copies of the letters and any verifying statements will be made available upon request.

REACT is not expected to be used by the parishes in emergencies and references to REACT will be dropped in the next revision to the State Plan.

C.1.b Resources will be specified, when made known to the Louisiana Nuclear Energy Division through final version of the Federal Radiological Monitoring and Assessment Plan (FRMAP).

C.1.c State and local resources available to support the Federal response, will be outlined when Federal response resources and anticipated support needed are specified through final version of FRMAP.

Reference to letters of agreement in Section VII.A.4, page 40 will be deleted in the next revision of the State Plan.

Correct cross reference as specified.
Attachment, page iii.
Change page number.

C.2.a Correct cross reference as specified.
Attachment, page iii.
Change page number.

C.3 State Plan
Tab 3 to Chapter 6
G.2. page 6-13
Delete sentence which describes mobile laboratory.

Add a description of the LSU Nuclear Science Department capability to support LNED's emergency response.

11-23-83

C.4 Southern Mutual Radiological Assistance Plan (SMRAP) constitutes an agreement (see Chapter 2 of SMRAP) and has been signed by the governors of the respective states.

LOA with Hospitals and Nursing Homes have been completed and will be submitted with the other letters.

Request for outside resources is detailed in parish IP's and response time has been anticipated.

State and parish IP's provide methods for detailing anticipated resource requirements at different emergency classifications. This information will be transmitted to the proper response organization prior to exhausting available resources.

D.4 **Add a cross reference to the State Plan that indicates this information this information is also available in State IP's.**

E.1 The Operational Hotline is a self-verifying notification system. Initiating calls can only be made from the plant. Also, each message form has a commercial telephone number available for verification.

As stated in response A.3, DOE and FEMA are the lead federal agencies. Any supporting agencies will be notified through these. Federal resource requirements will be listed as soon as they are made available to the LNED.

E.5 Federal guidance does not require a joint public information center. Protective action messages will be released by local and state organizations via local media and EBS as appropriate. The St. Charles and St. John emergency plans call for the release of emergency public information through their respective Parish Public Information Offices. It is specified in the parish IP's that only the Parish President can authorize public information releases.

F.1.d **Correct cross reference as specified**
State Plan, page vii **Attachment, page iv**
Add page number 3-3 **Enclosure 2, change letter I to H**

G.1 **Correct cross reference**
Attachment, page iv
G.1., add page number 24

G.4.a St. John the Baptist and St. Charles parishes reserve the right to maintain independent public information organizations. Information released is specific to the individual parishes. A TWX capability has been established specifically for coordination of public information between organizations.

The Parish President, as the chief elected official, reserves the right by home rule charter to make this decision. There may be situations where the designated spokesperson is not the public information officer.

H.10 Correct cross reference as specified.
State Plan, page vii
Add - H.10 Chapter 6, page 6-13, Tab 3,G

H.11 Enclosure 1 to Tab 3 of Chapter 6
11.B. page 6-17
Change title Sampling Supplies to LNED Emergency Response Kits

These kits are maintained and inventoried in the LNED laboratory after use or semi-annually.

Parish emergency equipment is supplied and maintained by LOEP and is inventoried at each parish EOC after use or semi-annually.

I.8 Add anticipated response times for LNED personnel
Add a cross reference to State Plan to show that call our list for LNED personnel is located in the State implementing procedures

I.10 The procedures used are those incorporated by EPA-520/1-75-001, Appendix D.

A hand method for estimating off-site dose projections will be added to State implementing procedures.
Add a cross reference to the State plan that indicates this information is available in the State IP's.

J.2 This criteria refers to the evacuation of onsite personnel to suitable offsite locations. It does not refer to arrangements for reception or sheltering of the general public in support parishes. The information provided in Chapter 4.VI.F, enclosures 1 and 2, demonstrates coordination between the W3 Site Plan and local plans for movement and handling of onsite personnel who may need to be evacuated to an offsite location.

Add a cross reference to the State plan to indicate this information is located in the Parish Enclosures

J.9 The statement is intended to say that limitations to exposure for emergency workers will be imposed when radiation doses approach the 5 rem threshold. The intention is to be more conservative, rather than allow emergency workers doses to reach 25 rem.

Chapter 7, IV.A.6.b., page 7-7, change the term "for routine operations" to "for the general population."

Chapter 7, IV.B.2.b.(1) page 7-9, change the term "available" to "warranted".

J.10.e Correct cross reference as specified.
State Plan, page viii
Add - Chapter 9, V.B.2, page 9-9
Table to Chapter 9, page 9-13

Change the following:
Chapter 5 to Attachment I V.B.2.b., page 46
Delete the second sentence which reads, "This substance will be supplied by LNED..." Add the following: "Quantities of KI, sufficient to meet short term offsite contingencies, is available at St. Charles Parish and St. John the Baptist Parish EOC's, and will be administered at the order of the ASOEA in accordance with state policy

J.10.i and J.10.1. The W3, Evacuation Time Estimate is referenced in the emergency plans for the respective parishes and is available to those decision makers who will locate in the Parish EOc's.

J.10.m Tabs 1 and 2, Chapter 6, pages 6-7 through 6-10 explain the concept of PAG's. However, the PAG's are not the only criteria used in determining protective actions. The rish parishes use considerable flexibility in making decisions for protective actions.

A full definition of projected dose as stated in EPA-520/1-75-0001, September 1975, page 2.1 - 2.2 will be included in Tab 1, Chapter 6 and Tab 1, Chapter 7 of the State Plan.

J.12 Arrangement for the registering and monitoring of evacuees are available in the support parish plans. The radiation monitoring equipment is also described in support parish plans. Equipment is stored in the support parish Civil Defense offices, with back-up units available through the Louisiana Office of Emergency Preparedness.

K.4 State Plan Chapter 9, III.E. page 9-3, lines 4 and 5:
Change the work "will" to "may".

L.1 1. A statement to verify Ochsner's capability will be included in the revision of the State Plan.

2). Training for local and back-up medical services is provided for by the Southeast Louisiana Emergency Medical Systems Council.

3.) Intra parish mutual aid agrement exist which specifies general ambulance support between parishes. Training will be provided by the Southeast Louisiana Emergency Medical Systems Council.

4.) At this time, the State is re-evaluating its' position with regards to the use of the local hospitals to handle contaminated individuals. Major hospitals that are near the Nuclear facilities are more capable of handling contamination problems. Training at the major hospitals

can be more comprehensive than trying to train a large number of smaller, local hospitals that may not be able to cope with a contamination situation. When a more definite decision is made by the state, you will be notified. Training will be provided for through the state and the Southeast Louisiana Emergency Medical Systems Council.

5). See answer number 4 above.

6). See answer number 3 above.

7). St. Charles and St. John the Baptist parishes are unique in their need and development of emergency plans. Yes, the EMS system was involved in the planning stages.

8). NUREG 0654 section L.1. requires the hospital and medical support be arranged for, and that personnel are trained for this support role. It is our opinion that a description of how a local plan interfaced with the EMS system and how the parishes arrived at their needs for medical manpower is not required for inclusion in the plans.

9). Medical attendants are provided with ambulances as a normal business procedures. Again, training for drivers and attendants is provided for by the Southeast Louisiana Emergency Medical Systems Council in coordination with LNED.

10). See answer number 1 above.

O.1 LNED has the responsibility of training. At this time, LNED and the licensee are developing a training program and timetable for upcoming training.

P.3 Correct cross reference as specified.
State Plan, page ix
Change page number from 22 to 26

P.8 Correct cross reference as specified.
Attachment
Add page numbers iv through viii

ST. JOHN THE BAPTIST PARISH CONCERNS AND RESOLUTIONS

1. Frequent malfunction of the operational hotline phone.

The initial problems encountered with the operational hotline have been resolved. The proper operation of the hotline is being confirmed through monthly tests leading to the Waterford 3 exercise-for-score. Following the exercise, the operational hotline will be tested in accordance with the guidance established in NUREG-0654. Any malfunctions discovered as part of the testing program will promptly be remedied by LP&L.

In addition, a push-to-talk feature and a mouthpiece confidencer device have been installed at St. John's hotline station to reduce background noise from being transmitted through the system. Also, a feature is to be installed which will allow each hotline station to ring-up the Waterford site during an emergency.

2. Prompt notification of individuals in the fish camps within the 10-mile EPZ.

LP&L has purchased a portable siren for St. John Parish which will be capable of notifying 75% of the camps located in the wetlands. LP&L is in the process of purchasing two helicopter mounted warning devices for St. John Parish and two for St. Charles Parish.

The Louisiana Nuclear Energy Division has made contact with three State agencies who operate helicopters: the Louisiana State Police, the Louisiana Department of Wildlife and Fisheries, and the Louisiana Department of Transportation and Development. Each of these agencies has given assurance that helicopters will be made available in the event of an emergency. In addition, St. John Civil Defense is seeking an agreement from a private provider for two helicopters to be used in an emergency. These private helicopters are located several miles beyond the perimeter of the 10 mile EPZ and could be made available on short notice.

Federal Emergency Management Agency

Region VI Federal Center Denton, Texas 76201

September 16, 1983

MEMORANDUM FOR: DAVE MC LOUGHLIN
Acting Associate Director
State and Local Programs and Support

FROM: Jerry Stephens
Regional Director

SUBJECT: Interim Finding on Waterford III Steam Electric Station

Attached is a copy of the Federal Emergency Management Agency Region VI Radiological Assistance Committee, Argonne National Laboratory, and FEMA Region VI review of the State of Louisiana Peacetime Radiological Response Plan Revision #4 and the St. Charles and St. John the Baptist Parishes' emergency response plans. These off-site plans were developed and submitted to FEMA Region VI in accordance with Paragraph 350.7 of 44 CFR, Part 350 in support of the Waterford Plant.

The review of the plans was based on Section II (A through P), Planning Standards and Evaluation Criteria, NUREG-0654/FEMA-REP-1, Rev. 1.

Also in response to a memorandum dated March 25, 1983, from Edward L. Jordan to Richard W. Krimm, FEMA was requested to review the five concerns expressed by the St. John Parish Civil Defense Director and include our findings as a part of this interim finding.

We also had a concern brought up by Mr. Charles Hackney (NRC Regional Office, Arlington, Texas) to my RAC Chairman concerning how the personnel on the ships that are docked along the Mississippi (loading or unloading cargo) would be evacuated.

This item was discussed by the RAC Chairman with State and local personnel who advised that the ships' personnel would be considered as part of the industry where the ships were docked. Therefore, the ships' personnel would be evacuated using the evacuation plan for that particular industry.

The inadequate elements discovered by the review of the State and Local Plans will be furnished to the State of Louisiana by letter for comment and/or corrections. We will maintain close liaison with the State to see that the inadequate elements are corrected to our satisfaction and will notify FEMA National at that time.

Based on the review of the State and Parish Off-site Emergency Response Plans, there is reasonable assurance that the plans are adequate and capable of being implemented.

Many of the remarks in the review of the plans indicate that several elements are inadequate due to the lack of letters of agreement. The State has assured FEMA that most of these letters have already been obtained and they are in the process of obtaining the remainder. They wished to obtain all letters before submitting them to FEMA.

Attachments

JAN 4 1984

In Reply Refer To:
Docket: 50-382/83-28

Louisiana Power & Light Company
ATTN: R. S. Leddick, Sr., Vice President -
Nuclear Operations
142 Delaronde Street
New Orleans, Louisiana 70174

Gentlemen:

This refers to the Systematic Assessment of Licensee Performance (SALP) Board Report of the Waterford Steam Electric Station, Unit 3, facility. The SALP Board met on August 30, 1983, to evaluate the performance of the subject facility for the period July 1, 1982, through June 30, 1983. The performance analyses and resulting evaluation are documented in the enclosed SALP Board Report. These analyses and evaluations were discussed with you at the Waterford 3 site on October 18, 1983.

It is my view that Louisiana Power & Light Company's overall regulatory performance at the Waterford facility is satisfactory. As the attached report indicates, your performance improved in eight functional areas and you received the highest performance category rating in six areas, as compared to the previous SALP evaluation. This level of improvement is worthy of note.

Four functional areas were assessed to be in performance category 3. These areas are safety-related structures; maintenance; emergency preparedness; and confirmatory measures, chemistry/radiochemistry portion of radiological control. The ratings in these areas indicate a need for additional management attention and oversight on your part.

Your letters dated October 31, 1983, and November 18, 1983, in response to the SALP Board findings, and the SALP Board Report, appear as enclosures to this letter, which issues the SALP Board Report as an NRC Report.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, your letters of October 31 and November 18, 1983, our letter of October 11, 1983, a copy of the 1983 SALP Report, and a copy of this letter will be placed in the NRC's Public Document Room.

No reply to this letter is required; however, should you have any questions concerning these matters, we will be pleased to discuss them with you.

Sincerely,

"ORIGINAL SIGNED BY
J. T. COLLINS"

John T. Collins
Regional Administrator

Enclosures:
1. Letter 10/11/83, G. L. Madsen (NRC) to R. S. Leddick (LP&L), including NRC SALP Board Report 50-382/83-28
2. Letter 10/31/83, T. F. Gerrets (LP&L) to E. Johnson (NRC)
3. Letter 11/18/83, R. S. Leddick (LP&L) to E. Johnson (NRC)

cc
Louisiana Power & Light Company
ATTN: F. J. Drummond, Nuclear Services Manager
142 Delaronde Street
New Orleans, LA 70174

Mr. R. T. Lally
Middle South Services
P.O. Box 61000
New Orleans, LA 70161

Louisiana Power & Light Company
ATTN: R. P. Barkhurst, Plant Manager-Nuclear
P.O. Box B
Killona, LA 70066

Louisiana Power & Light Company
ATTN: T. F. Gerrets, QA Manager
142 Delaronde Street
New Orleans, LA 70174

OCT 11 1983

In Reply Refer To:
Docket: 50-382/83-28

Louisiana Power & Light Company
ATTN: R. S. Leddick, Sr. Vice President
Nuclear Operations
142 Delaronde Street
New Orleans, LA 70174

Gentlemen:

This refers to the Systematic Assessment of Licensee Performance (SALP) Board Report of the Waterford Steam Electric Station, Unit 3, facility. The SALP Board met on August 30, 1983, to evaluate the performance of the subject facility for the period July 1, 1982, through June 30, 1983. The performance analyses and resulting evaluation are documented in the enclosed SALP Board Report. These analyses and evaluations will be discussed with you at the Waterford 3 site on October 18, 1983.

The performance of your facility was evaluated in the selected functional areas identified in Section IV of the enclosed SALP Board Report.

The SALP Board evaluation process consists of categorizing performance in each functional area. The categories which we have used to evaluate the performance of your facility are defined in Section II of the enclosed SALP Board Report. Section III of the enclosed SALP Board Report contains a summary of the categories assigned to the various functional areas.

Any comments which you may have concerning our evaluation of the performance of your facility should be submitted to this office by November 7, 1983.

Your comments, if any, and the SALP Board Report, will both appear as enclosures to the Region IV Administrator's letter which issues the SALP Report as an NRC Report. In addition to the issuance of the report, this letter will, if appropriate, state the NRC position on matters relating to the satus of your safety program.

Comments which you may submit at your option are not subject to the clearance procedures of the office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Should you have any questions concerning this letter, we will be glad to discuss them with you.

Sincerely,

"Original Signed by
G. L. MADSEN"

G. L. Madsen, Chief
Reactor Project Branch 1

Enclosure:
Appendix - NRC SALP Board Report 50-382/83-28

cc w/enclosures:
Louisiana Power & Light Company
ATTN: R. P. Barkhurst, Plant Manager
P. O. Box B
Killona, LA 70066

Louisiana Power & Light Company
ATTN: F. J. Drummond, Project Manager, Nuclear
142 Delaronde Street
New Orleans, LA 70174

Louisiana Power & Light Company
ATTN: Tom Gerrets, QA Manager
142 Delaronde Street
New Orleans, LA 70174

Middle South Services
ATTN: R. T. Lally
P. O. Box 61000
New Orleans, LA 70161

APPENDIX

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

Systematic Assessment of Licensee Performance

Report: 50-382/83-28

Docket: 50-382 Construction Permit: CPPR-103

Licensee: Louisiana Power & Light Company (LP&L)
142 Delaronde Street
New Orleans, Louisiana 70174

Facility: Waterford Steam Electric Station, Unit 3

Appraisal Period: July 1, 1982, to June 30, 1983

Licensee Meeting: October 18, 1983

SALP BOARD: J. E. Gagliardo, Director
Division of Resident, Reactor Project & Engineering Programs
R. Bangart, Director
Division of Vendor & Technical Programs
G. L. Madsen, Chief, Reactor Project Branch 1
W. A. Crossman, Chief, Reactor Project Section B
J. H. Wilson, NRR Project Manager
G. L. Constable, Senior Resident Inspector
T. A. Flippo, Resident Inspector

Other Attendees: P. Check, Deputy Regional Administrator
B. Murray, Chief, Facilities Radiation Protection Section
L. Martin, Reactor Inspector
C. Oberg, Reactor Inspector
C. Hackney, Energency Preparedness Analyst

Reviewed By: W A Crossman 10/11/83
W. A. Crossman, Chief, Reactor Project Section B Date

Approved By: G L Madsen 10/11/83
G. L. Madsen, Chief, Reactor Project Branch 1 Date
(SALP Board Chairman)

I. INTRODUCTION

The NRC has established a Systematic Assessment of Licensee Performance (SALP) program as an integrated NRC staff effort to collect available observations and data on a predetermined schedule and to evaluate licensee performance based on these observations and data. Emphasis is placed on NRC understanding the licensee's performance in the 20 functional areas listed in the body of the report and discussing and sharing this understanding with the licensee. SALP is an integrated part of the regulatory process used to assure licensee's adherence to the NRC rules and regulations. SALP is oriented toward furthering NRC's understanding of the manner in which: (1) the licensee management directs, guides, and provides resources for assuring plant safety; and (2) such resources are used and applied. The integrated SALP assessment is intended to be sufficiently diagnostic to provide meaningful guidance to licensee management related to quality and safety of plant operation, modifications, and new construction.

The integrated review was conducted by a SALP Board composed of NRC personnel who are knowledgeable of the licensee's activities. The SALP Board met on August 30, 1983, to review data and observations and to assess the licensee's performance in 20 areas. This SALP report is the SALP Board's assessment of the licensee's safety performance at Waterford 3, during the period of July 1, 1982, to June 30, 1983.

The results of the SALP Board assessments in the selected functional areas will be discussed with the licensee at a meeting to be held on October 18, 1983.

II. CRITERIA

Licensee performance was assessed in 20 selected functional areas. Each of these functional areas represents an area significant to nuclear safety. Evaluation criteria as listed below were used, as appropriate, in each of the functional area assessments:

1. Management involvement in assuring quality
2. Approach to resolution of technical issues from safety standpoint
3. Responsiveness to NRC initiatives
4. Enforcement history
5. Reporting and analysis of reportable events
6. Staffing (including management)
7. Training effectiveness and qualification

In addition, SALP Board members considered other criteria, as appropriate.

Based upon the SALP Board assessment, each functional area evaluated is classified in one of the three performance categories. The definition of each of these performance categories is:

Category 1. Reduced NRC attention may be appropriate. Licensee management attention and involvement are aggressive and oriented toward nuclear safety; licensee resources are ample and effectively used such that a high level of performance with respect to operational safety or construction is being achieved.

Category 2. NRC attention should be maintained at normal levels. Licensee management attention and involvement are evident and are concerned with nuclear safety; licensee resources are adequate and are reasonably effective such that satisfactory performance with respect to operational safety or construction is being achieved.

Category 3. Both NRC and licensee attention should be increased. Licensee management attention or involvement is acceptable and considers nuclear safety, but weaknesses are evident; licensee resources appear to be strained or not effectively used such that minimally satisfactory performance with respect to operational safety or construction is being achieved.

III. SUMMARY OF RESULTS

In summary, the licensee's performance, as determined during the SALP Board meeting, is shown in the table below, along with the performance category from the previous SALP evaluation period:

	Functional Areas	Performance Category (7/1/82 To 6/30/83)	Performance Category (7/1/81 To 6/30/82)
A.	Soil and Foundation	1	N/A
B.	Safety-Related Structures	3	2
C.	Piping Systems and Supports (Including HVAC)	2	3
D.	Safety-Related Components	1	3
E.	Electrical Power Supply and Distribution	1	2
F.	Instrumentation and Control Systems	2	3

III. SUMMARY OF RESULTS (Continued)

	Funcational Areas	Performance Category (7/1/82 To 6/30/83)	Performance Category (7/1/81 To 6/30/82)
G.	Design Control	2	N/A*
H.	Fire Protection	1	2
I.	Quality Assurance-Construction	2	N/A*
J.	Quality Assurance-Operations	1	N/A*
K.	Preoperational Testing	2	2
L.	Plant Operations Preparation	2	2
M.	Radiological Controls		
	1. Radiation Protection	2	2
	2. Radwaste Systems, Effluent Releases and Monitoring	2	3
	3. Transportation Activities	2	3
	4. Confirmatory Measures, Chemisty/ Radiochemistry	3	1
	5. Environmental Surveillance	2	N/A
N.	Initial Fuel Load Preparations	1	2
O.	Maintenance	3	3
P.	Emergency Preparedness	3	N/A
Q.	Security and Safeguards	2	1
R.	Licensing Activities	2	2
S.	Management Control	2	N/A*
T.	Training	2	N/A*

The total NRC inspection effort during this SALP evaluation period consisted of 33 inspections involving a total of 4432 man-hours onsite by NRC inspectors and subcontractors.

*Incorporated in another functional area in 1982 SALP Report.

IV. PERFORMANCE ANALYSIS

A. Soil and Foundation

1. Analysis

On May 11, 1983, a nonconformance report (NCR) was written describing cracks in the concrete base mat as evidenced by the percolation of small amounts of water up through these cracks. The basis for this NCR was a statement in the FSAR that the common foundation mat was designed to provide a water-tight barrier. This issue was previously evaluated in 1977 as a result of similar cracks identified at that time. Based on this previous analysis, LP&L determined that these cracks did not represent a significant problem. No violation or construction deficiency reports were issued.

2. Conclusion

This is apparently an isolated issue that has received the attention of the press and certain members of Congress as a result of an anonymous allegation. LP&L has initiated an independent evaluation of this issue. The NRC will review this evaluation. LP&L's responses to NRC questions in this area have been excellent, indicating appropriate management interest in an accurate evaluation of safety issues.

The licensee is considered to be in Performance Category 1 in this area.

3. Board Recommendations

a. Recommended NRC Actions

The NRC inspection effort will continue to follow the issue of cracks in the concrete base mat until a resolution is reached, but no routine inspection will be conducted in this area.

b. Recommended LP&L Actions

Continue management attention until a resolution is reached on this issue.

B. Safety-Related Structures

1. Analysis

This area has been inspected by region-based NRC inspectors on several occasions. Procedures were reviewed, work-in-progress was observed, and documentation was reviewed. Two violations and two construction deficiencies were identified in this functional area regarding inadequate documentation and installation deficiencies concerning American Bridge Division U. S. Steel (American Bridge) structural steel. It should be noted that American Bridge withdrew from the site in mid-1981. This issue is also discussed under QA-Construction below.

2. Conclusion

As a result of these construction deficiencies, LP&L determined that a 100% reinspection of this area would be required. These deficiencies were similar to deficiencies identified in NRC Inspection Report 82-14 that resulted in a civil penalty and indicate that an apparent weakness existed in American Bridge's QA program.

The applicant is considered to be in Performance Category 3 in this area.

3. Board Recommendations

a. Recommended NRC Actions

The level of NRC inspection effort should increase in other areas covered by the QA/QC audits.

b. Recommended LP&L Actions

Assure that all contractors and subcontractors provide high quality systems and fully documented work records. The licensee should strengthen the LP&L construction QA effort.

C. Piping Systems and Supports (Including HVAC)

1. Analysis

Inspection activities performed by the NRC inspectors in this functional area included inspection of welding, anchor bolts, as-built program review, followup of QA/QC activities related to the civil penalty that was subsequently issued March 3, 1983, and an independent inspection conducted by NRC Region I personnel of NDE activities.

The as-built program was reviewed to determine the adequacy of procedures, status of completion, and action the licensee has taken to assure the as-built design documents will be available to operations personnel for commercial operation. It was determined that the as-built program adequately represents facility status and meets the intent of providing as-built prints for plant operation and design verification. Two violations were identified during this assessment period involving lack of proper clearance between pipe-to-pipe, pipe-to-structure, and support-to-support interfaces and failure to control light loading on HVAC hangers.

A random sample of piping systems, components, pipe sizes and materials, shop and field welds were selected for nondestructive testing and verification of welding procedures. Quality records were reviewed for completeness and compliance with licensee's FSAR commitment. Individual personnel qualifications and certification records were also reviewed.

Three construction deficiency reports were issued in this functional area. One involved a failure of a gasket in the HPSI system during cold hydro, a second involved a low elongation length problem involving steel used to fabricate seven hangers. Both of these situations appear to involve isolated instances. The third CDR involved undersized socket welds identified by LP&L QA on work completed in the 1978-1980 time frame by Tompkins Beckwith. This is similar to CDR 28, April 15, 1981, involving Schedule 160 socket welds. At that time, a sample of Schedule 80 socket welds were inspected but no problems were identified.

2. Conclusion

Current QA/QC activities at the contractor and subcontractor level still rely heavily on LP&L to identify problems that should have been identified by the subcontractor earlier. The system testing and the overall turnover process, if effective, should be able to fully establish the credibility of these safety-related systems and supports.

The licensee is considered to be in Performance Category 2 in this area.

3. Board Recommendations

a. Recommended NRC Actions

Follow up inspections of systems and hangers to determine the effectiveness of licensee's QA/QC efforts in this area.

b. Recommended LP&L Actions

Assure that all contractors and subcontractors provide high quality systems and fully documented work records. The licensee should strengthen the LP&L construction QA effort. (See QA Construction, Section I.)

D. Safety-Related Components Including Vessels, Internals, and Pumps

1. Analysis

The NRC inspectors performed routine reviews of this functional area throughout the appraisal period. Two minor violations were identified regarding traceability of records. Six construction deficiencies were identified as a result of testing and QA activities.

2. Conclusion

Substantial improvements in management controls have been noted in this area, especially in relation to care and maintenance of safety-related equipment. System testing appears to be properly identifying problem areas and technically sound evaluations appear to be the norm.

The licensee is considered to be in Performance Category 1 in this functional area.

3. Board Recommendations

a. Recommended NRC Actions

Continue reduced emphasis on inspection effort in this area.

b. Recommended LP&L Actions

The licensee should continue emphasis on operational readiness regarding the care and testing of safety-related components.

E. Electrical Power Supply and Distribution

1. Analysis

The NRC inspectors performed periodic reviews of this functional area. The NRC inspectors noted that two MCC's had electrical cables routed through conduits in the floor in a very narrow compartment. Several of the cables had been stepped on and were being stressed at the point of entry to the back of the MCC due to improper supports. Control of such activities has been greatly improved during the past year.

One violation was identified in this area related to the inspection records for the installation of the Diesel Generator Control and Relay Panel 3B-S. (See also Design Control for other document control problems.) In general, inspection related records were available and adequate. Four construction deficiency reports were written in this functional area, three related to equipment problems and one involved exceeding the shelf life of cable splice and termination tape.

2. Conclusion

Consistent evidence of management involvement including responsive, technically sound resolution of issues, no major violations, and prompt, effective corrective action has been observed.

It should be noted that the major work has been completed in this area and that the subcontractor's work force has left the site. In the future, electrical work will be done by Ebasco Services, Inc. (Ebasco) force account and LP&L electrical maintenance.

The licensee is considered to be in Performance Category 1 in this area.

3. Board Recommendations

a. Recommended NRC Actions

The level of inspection effort in this functional area should ensure that the new work organizations properly maintain control of electrical work activities.

b. Recommended LP&L Actions

Ensure that the present quality of safety-related work activities is maintained by the new work organizations.

F. Instrumentation and Control Systems

1. Analysis

The NRC inspectors have conducted periodic inspections in this functional area. Procedures were reviewed, work-in-progress was observed, and documentation was reviewed. No violations were identified in this functional area. Three construction deficiency reports were issued. One identified by LP&L QA involved inappropriate tube track welding requirements. A second involved a linear manufacturing defect in 1/2" diameter stainless steel tubing. The third construction deficiency involved undersized socket welds on 1/2" schedule 160 sample lines. These welds had been previously inspected to the wrong criteria.

2. Conclusion

During the appraisal period, the major work was reinspection and correction of previously completed items. New problems became visible because of the reinspection required as part of the civil penalty. There is consistent evidence that management is heavily involved with these issues and corrective action is being accomplished.

The licensee is considered to be in Performance Category 2 in this area.

3. Board Recommendations

a. Recommended NRC Actions

The level of inspection effort in this functional area should remain the same through the system transfer process.

b. Recommended LP&L Actions

Continue management attention in this area until all corrective actions are completed and final documentation is transferred to LP&L.

G. Design Control

1. Analysis

NRC inspectors routinely observed design control practices while reviewing safety-related construction activities in many of the above functional areas, NRC inspectors identified four violations involving nine examples of failures to properly control design documents. One construction deficiency was issued with respect to a wiring design error involving the plant protection system.

2. Conclusion

During the appraisal period, LP&L continued to have difficulty properly controlling red line drawings. The types of control problems include: missing drawings and records; failure to update drawings in the field; failure to follow design control procedures; and failure to provide sufficient design detail. Taken separately, these kinds of difficulties would not be a matter of significant concern. It is recognized that some of the difficulties being identified now were created in the past; however, many of these issues have been around for several years and are still problems in the field.

Although management attention in these areas is apparent, LP&L has had difficulty in flushing out the problem areas. This is believed to be caused by the difficulty in dealing with many subcontracting organizations and a past LP&L policy of minimal overview of Ebasco activities, including a small LP&L construction QA organization. Recent LP&L management changes aimed at resolving this interface problem appear to be a step in the right direction.

The licensee is considered to be in Performance Category 2 in this area.

3. Board Recommendations

a. Recommended NRC Actions

Special attention should be devoted to the turnover of subcontracted work activities to the Ebasco force account to ensure that remaining work activities are properly controlled and documented.

b. Recommended LP&L Actions

The licensee should increase surveillance of design and documentation control activities and careful scrutiny of as-built systems prior to system transfer to the plant manager.

H. Fire Protection

1. Analysis

The evaluation of the functional area of fire protection is based on an inspection of the installation of fire barriers, observations of combustible material and fire hazards during plant tours, fire protection training, and followup on a cable tray fire that occurred on July 12, 1982. No violations were identified in this functional area. One construction deficiency report (CDR) was issued (cable tray fire referenced above).

2. Conclusion

Significant improvement in fire protection status was observed during this reporting period. Consistent evidence of properly controlled work activities and timely, thorough, and technically sound planning are supported by direct observation of the control of combustible material and work in progress.

The licensee is considered to be in Performance Category 1 in this area.

3. Board Recommendations

a. Recommended NRC Actions

The NRC will conduct routine inspections with the scope of the inspections being reduced.

b. Recommended LP&L Actions

Continue present level of emphasis on good overall fire protection practices.

I. Quality Assurance - Construction

1. Analysis

This area has been inspected on a continuing basis by the NRC resident inspectors and regional-based inspectors. Three violations were identified in this functional area during this reporting period. One violation, a civil penalty, although issued December 6, 1982, formed the basis for the SALP evaluation last year as these matters were first reported to NRC during May of last year. This resulted in Category 3 ratings in the areas of Piping Systems and Supports, Instrumentation and Control Systems, and Audits, Reviews and Committee Activities (QA). During this evaluation period, followup activities related to this violation were observed along with other routine inspection activities.

The other two violations involved missing QA records in regard to structural steel installed by American Bridge, who withdrew from the site in 1981. These violations were initially identified in August and December of 1982. Subsequently, LP&L reported two construction deficiencies in April 1983 involving American Bridge record and hardware deficiencies. These deficiencies were similar to deficiencies identified in NRC Inspection Report 82-14 that resulted in a civil penalty.

2. Conclusion

Taken as a whole, the combined construction QA/QC organization for LP&L, Ebasco, Tompkins Beckwith, Inc. (T-B), and Mercury of Norwood, Inc. (Mercury) have undergone extensive upgrading in response to the construction deficiencies that led to the civil penalty for inadequate control of work activities. The response in the areas in question was thorough, records became well maintained, and procedures and policies were strictly adhered to. Evaluation in other safety-related areas led to the identification of one other area involving structural steel work and a subcontractor who had left the site in 1981. All other safety-related areas currently appear to have been adequately constructed. Although QA/QC staffing in general has significantly increased, LP&L construction QA force is still relatively small when considering their system turnover responsibilities and their responsibilities for oversight of all contractor and subcontractor QA/QC and work responsibilities.

LP&L Construction QA continues to have difficulty in effectively auditing the multiple QA/management organizations of the various onsite contractors and subcontractors in order that effective controls can be established. It does not appear that adequate oversight exists to prevent problems from occurring.

The licensee is considered to be in Performance Category 2 in this overall area.

3. Board Recommendations

a. Recommended NRC Actions

Continued in-depth spot checks of safety-related work activities being completed by all contractors and subcontractors.

b. Recommended LP&L Actions

Ensure adequate LP&L oversight of all safety-related construction activities and that all contractors and subcontractors provide a high standard of quality. The licensee should strengthen the construction QA effort.

J. Quality Assurance - Operations

1. Analysis

This area has been routinely observed by the NRC resident inspectors during the course of the evaluation period. No violations or construction deficiency reports were identified.

2. Conclusion

The LP&L operations QA organization has evolved into an effective, credible organization. Audits appear thorough, technically sound and timely. There is consistent evidence of prior planning and assignment of priorities. While a lot of work remains, it appears people are made available when needed and there is every expectation that this organization will continue to perform as it is now.

The licensee is considered to be in Performance Category 1 in this area.

3. Board Recommendations

a. Recommended NRC Actions

Reduce inspection effort in areas covered by operations QA audits.

b. Recommended LP&L Actions

Continue support of operations QA organization.

K. Preoperational Testing

1. Analysis

The evaluation of the functional area of preoperational testing is based on inspections of preoperational test procedures and witnessing of actual tests. Official test results have only recently been received from the licensee, therefore inspections have been limited in this area. One violation was identified during witness of the secondary hydrostatic test. During the test, the procedure was not followed properly, which resulted in containment being sprayed down with water. Two construction deficiencies were issued. One dealt with the inadequate review of CIWA's for reportability and the other concerned heat tracing design deficiencies identified during hot functional testing.

2. Conclusion

A significant amount of testing has taken place in this appraisal period. The licensee has expended a considerable amount of manpower to get the preoperational program into full operation. There have been times when the licensee has tried to test a system before the system is ready. One example of this was during hot functional test when a water hammer occurred in the emergency feedwater system due to the heat tracing not being installed.

An issue that remains open is the testing of flow instruments installed contrary to manufacturer's recommendations. While industry standards allow installations contrary to their recommendations on a case-by-case basis, the instruments must still respond as designed. LP&L expects to test the accuracy of the instruments during startup testing. The NRC inspectors will continue to monitor testing to verify the adequacy of these instrument.installations.

The licensee is considered to be in Performance Category 2 in this area.

3. Board Recommendations

a. Recommended NRC Actions

The level of NRC inspection effort in this functional area should remain the same due to the large volume of work that still needs to be completed by the licensee in the preoperational area.

b. Recommended LP&L Actions

Increased management attention will be needed to verify that instrumentation and control systems will operate as designed and the present quality of the startup program is maintained by the new startup organization.

L. Plant Operations Preparation

1. Analysis

The NRC inspectors have conducted periodic reviews of the licensee's preparation for plant operations. The major areas of inspections included training (see T below), emergency operating procedures (EOP), and general plant operations procedures and facility organization. No violations were identified in this functional area, but an open item was identified concerning the emergency operating procedures. One construction deficiency report was written in this functional area concerning the procurement of spare parts.

2. Conclusion

The licensee has taken aggressive action in filling key positions in their organization with previously experienced personnel. The NRC has been concerned because poor quality emergency operating procedures have made it through LP&L's review and approval process. It is the NRC's position that the kind of deficiencies that were identified must not be present in approved procedures. The NRC inspectors emphasized that all procedures need to be sufficiently detailed to allow the weakest, licensed operator to safely bring the facility to a safe condition. Based on observations made during the two reviews of the EOP's, the goal of having good EOP's is slowly being accomplished. The licensee has now committed to change from event oriented EOP's to function based EOP's prior to fuel load.

The licensee is considered to be in Performance Category 2 in this area.

3. Board Recommendations

a. Recommended NRC Actions

The level of NRC inspection effort in this functional area should remain the same.

b. Recommended LP&L Actions

Continue present level of emphasis on developing good overall plant procedures.

M. Radiological Controls

Five inspections were conducted during the assessment period by region-based radiation specialist inspectors. The five inspections included: two radwaste systems-preoperational (liquid, gaseous, solid); two radiation protection-preoperational; and one environmental surveillance-preoperational.

Transportation activities were inspected along with the radwaste systems inspection. A special radiation protection inspection regarding the receipt, handling, and storage of new fuel was performed during the radiation protection inspection. The following specific areas are included within the general functional area of radiological controls:

1. Radiation Protection

a. Analysis

Eighteen open items were identified during the original preoperational inspection (50-382/82-04) conducted during the 1981-82 SALP period. These open items involved programs related to organization, qualifications, training, exposure control, respiratory protection, surveys, ALARA, notification and reports, radiation controls, equipment and supplies, instrumentation, facilities, audits, startup surveys, and procedures. A followup inspection was conducted during this assessment period. No new open items were identified and seven existing open items were closed. No violations or deviations have been identified.

No significant problems have been identified during this assessment period regarding management oversight, audits, responsiveness to NRC initiatives, enforcement, reporting, resolution of technical issues, staffing, qualifications, and training.

The licensee has implemented a tracking system to ensure that NRC initiatives, such as open items, are reviewed and projected completion dates established. The applicant's proposed resolution of technical issues has been acceptable in most cases.

b. Conclusion

The licensee's progress is considered adequate regarding the development and implementation of an acceptable radiation protection program. Several open items have not been closed; however, in most instances only minor work needs to be completed in order to close these items. It appears that the licensee's proposed schedule to complete the remaining open items is timely and no significant problem areas remain to be resolved.

The licensee is considered to be in Performance Category 2 in this area.

c. Board Recommendations

(1) Recommended NRC Actions

The Board recommends that the NRC inspection program continue at the normal level during the remaining preoperational phase.

(2) Recommended LP&L Actions

Management attention should continue to ensure that necessary action is taken to close the existing open items before an operating license is issued.

2. Radwaste Systems, Effluent Releases, and Effluent Monitoring

a. Analysis

Two inspections covering radwaste systems, effluent releases, and effluent monitoring were performed during the assessment period. No violations or deviations were identified. Fourteen open items were identified during the initial inspection of this area (50-382/82-11) which was conducted in the 1981-82 SALP assessment period. Three new open items were identified in this assessment period. Of the 17 total open items, action has been completed to close four items. One construction deficiency was also issued in this functional area.

The lack of management attention for the entire radwaste program was a major concern in the 1981-82 SALP Report (Category 3). The NRC has noted an increased emphasis by the licensee during this assessment period to establish an adequate radwaste program. However, considerable work remains to be completed in this area. Work that remains to be accomplished includes: completion of the solid radwaste facility; ALARA reviews for liquid, gaseous, and solid radwaste systems; training of auxiliary operators responsible for operating the liquid and gaseous radwaste systems; control of effluent releases; testing of air cleaning systems; and completion of operating procedures.

The NRC has observed improvements in the areas of management oversight, resolution of technical issues, responsiveness to NRC initiatives, and training of personnel assigned to solid radwaste facility.

b. Conclusion

Considerable work remains to be completed in this area before an operating license is issued. The areas of major concern include: completion of the solid radwaste facility, ALARA reviews, training of auxiliary radwaste operators, and completion of operating procedures.

The licensee is considered to be in Performance Category 2 in this area.

c. Board Recommendations

(1) Recommended NRC Actions

The NRC inspection effort in this area will remain at the same level until all open items are closed.

(2) Recommended LP&L Actions

Continued management attention is necessary to ensure that the backlog of work is completed prior to issuance of an operating license.

3. Transportation Activities

a. Analysis

Transportation activities were inspected as part of the radwaste inspection effort. The area was identified as an open item in the previous SALP assessment period pending the completion of the program regarding assigned responsi-

bilities, training, audits, and operating procedures. This area was reviewed during this assessment period. The licensee had completed work to close the concerns involving assigned responsibilities, training, and audits. However, all necessary procedures for transportation activities had not been completed.

The licensee's program is considered adequate regarding management oversight, resolution of technical issues, responsiveness to NRC initiatives, reports, staffing, and training.

b. Conclusions

Except for the completion of certain procedures, the licensee has completed action for the concerns addressed in the previous SALP Report.

The licensee is considered to be in Performance Category 2 in this area.

c. Board Recommendations

(1) Recomended NRC Actions

NRC attention should be maintained at normal levels until the licensee's procedures have been reviewed to ensure compliance with the new regulations.

(2) Recommended LP&L Actions

Develop necessary procedures that include requirements appearing in the recent revisions of 10 CFR 20.311, 10 CFR 61, and 10 CFR 71.

4. Confirmatory Measurements, Chemistry/Radiochemistry

a. Analysis

This area was inspected during the assessment period which included an onsite visit with the Region IV mobile laboratory. The onsite work with the mobile laboratory included the comparison of analytical results between NRC and the licensee for selected radioactive standards. The results of these comparison measurements indicated greater than 90 percent agreement between the NRC and licensee. Agreement was established for 48 of 52 analytical measurements.

Fifteen open items were identified during the initial preoperational inspection conducted in the 1981-82 SALP reporting period. These open items involved organization, qualifications, training, sampling, releases, instrumentation, audits, and procedures. The results from the inspection performed during this assessment period revealed that sufficient progress had not been made to close any of the previously identified open items.

b. Conclusion

The Board is concerned regarding the lack of responsiveness by the licensee to NRC initiatives. This is evidenced by the lack of progress to complete action on issues identified as open items. This area was rated a Category 1 during the 1981-82 assessment period. However, it appears that licensee management attention has not been sufficient to ensure that the NRC concerns addressed as open items are closed in a timely manner.

The licensee is considered to be in Performance Category 3 in this area.

c. Board Recommendations

(1) Recommended NRC Actions

The level of NRC inspection effort in this area should be increased with particular emphasis on the licensee's progress to close open items.

(2) Recommended LP&L Actions

Increased management attention is necessary in this area to ensure that an adequate program is implemented prior to issuance of an operating license.

5. Environmental Surveillance

a. Analysis

An environmental surveillance inspection was conducted during the assessment period. No violations or deviations were identified. Four previously identified open items were closed and six new open items were reported. The new open items involved staffing, training, audits, contract services, environmental data, and operating procedures.

The licensee has completed the environmental surveillance program required during the construction activities. The licensee's proposed environmental surveillance for the operational phase was reviewed and appeared adequate to satisfy the radiological effluent Technical Specifications (NUREG-0472).

The licensee's performance has been adequate in the areas of management oversight, resolution of technical issues, responsiveness to NRC initiatives, enforcement, and staffing.

b. Conclusion

No significant problems have been identified in this area regarding the completion of specific environmental surveillance requirements. Several open items exist concerning the implementation of a comprehensive program.

The licensee is considered to be in Performance Category 2 in this area.

c. Board Recommendations

(1) Recommended NRC Actions

The area needs to be inspected prior to the reactor startup to ensure that the environmental surveillance program contained in the Technical Specifications has been implemented.

(2) Recommended LP&L Actions

Management attention is necessary to close open items identified during previous inspection and that the proposed radiological effluent monitoring program is implemented prior to issuance of an operating license.

N. Initial Fuel Load Preparations

1. Analysis

During this assessment period, LP&L was granted a license to receive and store fuel at the Waterford 3 site. The fuel for the first core load has been received and is presently stored in the Fuel Handling Building.

The NRC inspectors expressed a concern during the previous assessment period that the 15% sample to verify presence of boron in the high density fuel racks in the spent fuel storage pool was insufficient. Licensee has made a commitment to take a 100% sample.

NRC inspectors observed portions of preparatory training lectures and witnessed portions of receipt, inspection, and storage of fuel shipments.

No violations were identified in the functional area. One construction deficiency report was written as a result of inspection activities by LP&L related to the receipt of control element assemblies that were bent sufficiently to not be in specification.

2. Conclusions

Fuel receipt, inspection, and storage went very smoothly. Issues were identified and appropriately resolved and recorded.

The licensee is considered to be in Performance Category 1 in this functional area.

3. Board Recommendations

a. Recommended NRC Actions

Reduce inspection activities regarding routine storage and security of fuel. Routine inspection activity during work activities leading up to core loading.

b. Recommended LP&L Actions

Continue routine oversight regarding Fuel Handling Building activities.

O. Maintenance

1. Analysis

The evaluation of this functional area is based on the review of preventive and corrective maintenance procedures, maintenance training, and support provided to the startup group. One violation was identified in this functional area dealing with mechanical maintenance personnel attempts to obtain vibration readings on safety-related CCW Makeup

Pump A. Neither of the individuals was familiar with the task assigned, as they did not know how to read the instrument properly. One construction deficiency report was issued concerning damage to the pressurizer heaters during hot functional testing.

2. Conclusion

Through inspections made by the NRC inspectors during the appraisal period, it was determined that maintenance activities did not appear to be well coordinated with operations and startup. There appeared to be a major problem related to the lack of control by supervisors in assigning qualified personnel to support overall startup activities. It is also not clear at this point if maintenance training adequately addresses the importance of communications between maintenance personnel and the nuclear operations supervisor prior to and at the completion of maintenance activities.

The licensee is considered to be in Performance Category 3 in this area.

3. Board Recommendations

a. Recommended NRC Actions

The level of NRC inspection effort in this functional area should be increased with particular emphasis on assurance that qualified personnel are used to support startup activities.

b. Recommended LP&L Actions

Increase management attention in the area of assigning qualified personnel to support startup activities and overall maintenance training.

P. Emergency Preparedness

1. Analysis

An emergency preparedness appraisal was performed during this evaluation period. The appraisal was conducted after confirming with LP&L management that Waterford 3 Station was prepared for the appraisal; however, the appraisal results showed that adequate implementation of 10 CFR 50, Appendix E, emergency planning and preparedness criteria, had not been

achieved. Eleven significant appraisal findings were identified during the appraisal. These significant items were discussed with management during the exit interview. The eleven areas which will require licensee action prior to fuel loading are summarized below:

a. Onsite Emergency Organization
b. Offsite Radiological Monitoring
c. Personnel Accountability
d. Public Education and Information
e. Corporate and Site Emergency Plan and Procedures
f. Communications
g. Emergency Response Facilities
h. Emergency Equipment
i. Meteorology
j. Offsite Agencies
k. Personnel Training

In addition, 42 items requiring consideration for improvement in order to strengthen the emergency preparedness program were identified and 49 items were identified as being incomplete with respect to development or implementation. The appraisal team determined that the emergency organization was poorly identified and responsibilities were ill-defined.

In addition, the appraisal team was unable to determine the extent of training due to the absence of a formal training program and personnel training records.

2. Conclusion

The appraisal team could not determine the LP&L emergency preparedness status to be adequate because of the incompleteness of the emergency preparedness program. The appraisal findings demonstrated that the licensee has not progressed in its emergency preparedness program development to the extent necessary for their scheduled licensing.

The licensee is considered to be in Performance Category 3 for this evaluation period.

3. Board Recommendations

a. Recommended NRC Actions

An emergency preparedness appraisal followup will be conducted to verify adequate emergency preparedness status prior to fuel load.

b. Recommended LP&L Actions

Management should increase its knowledge of emergency preparedness regulatory requirements and guidance criteria. Management attention should be given toward assuring that the Waterford 3 training program, equipment installation, and approved procedures are accomplished to meet the licensing schedule.

Q. Security and Safeguards

1. Analysis

To achieve the general performance objective, as stated in the regulations, the onsite physical protection system and security organization shall include, but not necessarily be limited to, the capabilities to meet the specific requirements related to the following elements:

a. Physical Security Organization
b. Physical Barriers
c. Access Requirements
d. Detection Aids
e. Communication Requirements
f. Testing and Maintenance
g. Response Capability

This facility has received fuel which is in storage. Due to the continuing construction activities, all of the intrusion resistance, detection and assessment systems are not yet functional. Several areas of concern have been raised here. One major change was made in the main access control area since a design oversight was noted during inspection. A second concern, a design change from the originally engineered "sally port" access area to another method, was the topic in an NRC inspection report. Some adjustments were made to the setup, but it is still not constructed as originally designed in the approved plan.

The protective apparatus for this site is essentially broken into three categories: (1) hardware/electronics applications, (2) plans and procedural guides, and (3) human resources to implement and operate the first two. The latter two elements are visibly evolving in a very positive way and the area of personnel development is exceptional.

The first area, hardware/electronics applications, is not progressing with the planning and personnel development areas. The latter two areas are being developed directly by

the licensee's personnel who will carry out the plan. The hardware design and contracting is being done by a sub-contractor under the supervision of Ebasco. Continuing construction activities make review and testing for performance more difficult.

Several non-nuclear security incidents have occurred during this construction stage. The handling of these matters effectively demonstrated the responsiveness and professional capabilities to resolve problems on the part of the corporate and site security organizations and their law enforcement counterparts. Some of these same incidents have demonstrated the need to maintain firmer administrative control over the licensee's contractors.

2. Conclusion

The performance level associated with the development of the security organization is progressing in a positive and exceptional fashion.

The overall acceptance testing of the hardware and electronics applications are scheduled to be completed at a later date Preliminary onsite reviews and observations indicate that some security devices will require major adjustment. The responsibility for the development of the security program is divided between the licensee's security representative and Ebasco subcontractors. There appears to be a difficulty in the channels of communication between the two efforts.

An effective and receptive line of communication exists between the licensee's security representatives and the region's security inspection team. The involvement of management has been very good. Strong contributions of thought and time resources from the corporate and site management programs for two-thirds of the program are highly visible. This is not evident for the hardware and electronics installation.

The licensee is considered to be in Performance Category 2 in this area.

3. Board Recommendations

a. Recommended NRC Action

The level of NRC inspection effort concerning physical barriers, detection aids, and the developing, testing, and maintenance programs should be increased in accordance with licensee's progress toward operation.

b. Recommended LP&L Action

Examine the avenues of communications between the divided management activities of those responsible for (1) setting up the physical/electronic security systems, and (2) those who are to implement the total protection program under 10 CFR 73.

R. Licensing Activities

See Appendix A of this report.

S. Management Control

1. Analysis

This area has been inspected on a continuing basis by the NRC resident inspectors. Specific functional areas where increased LP&L management attention is warranted are included in the respective sections and discussed below. During the assessment period several organizational changes have occurred in management, including the selection of a new president, a new senior vice president-operations, a new plant manager-nuclear, a new assistant plant manager-operations and maintenance, and a new operations superintendent. Control of startup has also been transferred to plant operations reporting to the plant manager-nuclear. A new position with the title of Startup Manager was created and a new lead startup engineer was appointed. No violations were issued in this functional area.

2. Conclusion

Several functional areas indicate a continuing problem with the management control of safety-related activities. These include those areas rated Category 3 including structural steel, chemistry, emergency preparedness, and maintenance. In addition, a special concern is the approval by the Plant Operations Review Committee (PORC) of inadequate operating and emergency operating procedures. The failure to properly evaluate these procedures indicates a weakness in the overall review process.

The management changes have increased the number of people who have previous nuclear experience. At this time, it is difficult to assess the overall effect of these management changes in relationship to the operation of the plant; however, it seems to have been a positive step.

The licensee is considered to be in Performance Category 2 in this area.

3. Board Recommendations

a. Recommended NRC Actions

The level of NRC inspection effort in this functional area should remain the same.

b. Recommended LP&L Actions

The licensee should continue management effort to stay involved and provide appropriate oversight to all functional areas.

T. Training

1. Analysis

This area has been inspected twice by region-based NRC inspectors. The violation and deviation delineated below involve activities in the functional area of training.

a. Individual training schedules were not transmitted to each employee of the engineering department as required by PMD-TR-014, "Program Description for Engineering Training." (Severity Level V, 382/8324-01)

b. In deviation to an FSAR commitment, the governing document for general employee training, PMD-TR-002, "Program Description for General Employee Training," did not include a requirement for training in job related procedures and instructions. (Deviation, 382/8324-05)

In late 1981, the licensee established a separate nuclear training department to develop and to implement the training program for the plant staff described in the FSAR. Although training had already started in the required areas, the establishment of a centralized training department was designed to strengthen the program in view of NRC concerns that had been raised during the license review process. The purpose of the training inspections conducted during this SALP assessment period were to review the content and status of the training program.

2. Conclusion

The licensee has developed a comprehensive centralized training program which addresses all of the commitments contained in the FSAR. Most of the training department's key managers and supervisors have previous nuclear training experience and the overall level of staffing has been adequate to perform the function required during this assessment period.

Over the course of the assessment period, the licensee made significant progress in this functional area. Training of plant operators on the compact simulator was conducted, laboratories to train technicians were installed and placed in service, and many training positions, formerly staffed by contractors, were filled by LP&L employees. Adequate progress was made in implementing the training program in nearly every area. During the first inspection, weaknesses were noted in the training of cold license candidates and in systems training for plant technical staff. These findings received management attention and were corrected in a timely manner.

At the end of the assessment period, training for most of the cold license candidates and all STA candidates had been completed, although some weaknesses were noted in the knowledge level of some STA candidates. It was noted that a program for continued upgrading and refresher training for these persons had not been formulated. Further, it was noted that although the licensee could pinpoint the status of training for each of the departments, the remaining training elements that were to be completed in time to support fuel load for individual people were not easily determinable. Finally, it was noted that many of the training programs in place were defined by program description documents that were either duplicated, or even contradicted by implementing procedures. An additional item of concern was the proposed delay in acquiring a plant specific simulator, since the Combustion Engineering (C-E) simulator does not closely match the Waterford control room.

The licensee is considered to be in Performance Category 2 in this area.

3. Board Recommendations

a. Recommended NRC Actions

The NRC inspection effort in this area should continue at the same level. Inspections should concentrate on verifying that all required training has been completed in order to support fuel load, that requalification training for licensed operators and STA's has been started, that refresher training has been accomplished for these people to strengthen their skills, and to verify that a routine training program for the operations phase has been developed.

b. Recommended LP&L Actions

The licensee should take advantage of the time remaining to fuel load to provide refresher training to licensed operators and STA candidates in areas for which they have been shown to be weak by qualification or certification exams. The licensee should review the program descriptions which define the training progress and consolidate or revise them, as necessary, to eliminate duplication and to provide clear overall direction to the training program.

V. Supporting Data and Summaries

A. Violations

During this appraisal period LP&L was charged with 1 deviation and 12 violations of NRC requirements involving 17 separate examples of noncompliance. Examples that fit in more than one functional area are marked with an * to indicate they are shown more than once.

Functional Areas	Violations Severity Level					Deviation
	I	II	III	IV	V	
Soil and Foundation						
Safety-Related Structures					83-17(1a)* 82-18*	
Piping Systems and Supports (Including HVAC)					83-13*(2 violations)	
Safety-Related Components					83-09(1a) 83-17(1b)*	
Electrical Power Supply and Distribution					83-09(1b)	
Instrumentation and Control Systems						
Design Control					83-09(2) 83-13* 83-17(2,3)	
Fire Protection						
Quality Assurance - Construction			82-14		82-18* 83-17(1)*	
Quality Assurance - Operations						
Preoperational Testing					82-27	
Plant Operations Preparation						

A. Violations (Continued)

Functional Areas	Violations Severity Level I	II	III	IV	V	Deviation
Radiological Controls						
Radiation Protection						
Radwaste Systems, Effluent Releases and Monitoring						
Transportation Activities						
Confirmatory Measures, Chemistry/Radiochemistry						
Environmental Surveillance						
Initial Fuel Load Preparation						
Maintenance					83-18	
Emergency Preparedness						
Security and Safeguards						
Licensing Activities						
Management Control						
Training					83-24	83-24

B. Licensee Report Data

1. Licensee Event Report (LER) Number Reviewed: N/A

2. Construction Deficiency Reports (CDR)

The licensee reported 26 CDR's during the appraisal period.

7/15/82	Cable Tray Fire, RAB at +35' Level
7/26/82	Linear Crack in Stainless Steel Tubing
8/20/82	Undersize Welds on 1/2" Schedule 160 Piping
9/8/82	Procurement of Spare/Replacement Parts
9/28/82	Safety Injection Tanks Discharge Flow Rates
10/7/82	Orifice Plate Gasket Failures in HPSI System
10/20/82	Defective GE Type AKR Breakers, C-Clips Fall Off
*10/22/82	Failure of A500 Grade B Tube Steel to Meet Chemical/Physical Properties
1/11/83	Spurious Actuation of ESAES-J3109 Connector
1/28/83	Crosby Stellite Valve Discs
2/11/83	Inadequate Review of CIWA's for Responsibility
2/18/83	GE 480V SG Trip Coils Do Not Drop Out
3/2/83	Radiation Monitoring System RM-23 Control Module
3/8/83	T&B Undersize Schedule 80 Socket Welds
3/11/83	American Bridge RCB Structural Steel Welding Deficiencies
3/11/83	Station Battery Equalizing Charge Voltage Exceeds Coil Rating
3/11/83	Damage to Pressurizer Heaters During Hot Functional Testing

3/18/83	Inadequate Containment Purge Valves Closure Time and Flow Rate
3/29/83	American Bridge RAB, FHB Bolting & Welding Deficiencies
*4/15/83	Unqualified Components in Hydrogen Analyzers
4/20/83	Unsatisfactory Stroking of EFW Pump Turbine Steam Supply Shut Off Valves
*4/25/83	Bent Control Element Assembly Rods
4/27/83	Heat Tracing Deficiencies Identified During Hot Functional Testing
4/27/83	Shelf Life Exceeded on Cable Splice and Termination Tape
5/16/83	Tube Track Welding Deficiencies
6/22/83	Damage to Incore Instrumentation Guide Tubes

*Also Part 21 Reports

3. Part 21 Reports

The licensee identified three Part 21 Reports during the appraisal period. They are identified above in the Construction Deficiency Report (CDR) section of this report by asterisk.

C. Major Site Activities

The Waterford 3 site began the appraisal period July 1, 1982, with construction being reported at approximately 94% complete. Four major activities were accomplished during the appraisal period and they are shown below.

1. A hydrostatic test was conducted in October 1982, of the reactor coolant system and the steam generators.

2. In February 1983, LP&L received from the NRC a Material License which authorized the subsequent receipt, possession, and inspection and storage of the fuel assemblies for the first core load.

3. Hot functional testing was conducted in the months of February through April 1983.

4. Containment Integrated Leak Rate Test was successfully completed in April 1983.

At the end of the appraisal period, June 30, 1983, the construction was being reported at approximately 98% complete.

D. Major NRC Inspection Activities

One major NRC inspection activity occurred during this evaluation period. During January 1983, the NRC brought its mobile NDE laboratory to the Waterford 3 site and performed an independent examination of items previously examined and accepted by the licensee The examination included radiography (31 weldments), liquid penetrant (23 welds), thickness measurements (10 welds), visual examination (35 welds), hardness test (8 welds), ferrite test (9 welds), material verification (4 welds), and ultrasonic tests of portions of selected weldments. In addition, the NRC inspectors reviewed the licensee's NDE personnel qualification records and reverified selected radiographs and ultrasonic examinations.

The results of the examination, which included 424 hours of inspection onsite and 160 hours offsite, indicate that the licensee has good control over these activities. No violations were identified.

E. Escalated Enforcement Actions

During the assessment period, one significant violation was identified for which LP&L was assessed a Severity Level III Violation. The violation was assessed as a result of numerous deficiencies and discrepancies noted by LP&L's startup and QA organizations in both the as-built condition of systems offered for startup testing and deficiencies in the supporting quality documentation.

LP&L was notified on December 6, 1982, of the violation and proposed imposition of civil penalty in the amount of $20,000 for failure to comply with the requirements of 10 CFR 50, Appendix B, Criterion II, which requires that, "The quality assurance program shall provide control over activities affecting the quality of the identified structures, systems, and components to an extent consistent with their importance to safety. Activities affecting quality shall be accomplished under suitably controlled conditions."

Enforcement conferences were held on August 20 and November 23, 1982. After consideration of a request for mitigation of the proposed civil penalty, the order imposing the monetary penalty was issued by certified mail on March 16, 1983, and has been paid by licensee.

F. Management Conferences Held During Appraisal Period

Two management conferences were held with the licensee during the appraisal period with regard to emergency preparedness concerns and NRC's inspection findings related to the emergency operating procedures. Details of these concerns are included in the related functional areas. In addition, two enforcement conferences with LP&L management are discussed in paragraph V.E. above.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SEP 1 1983

Docket No.: 50-382

MEMORANDUM FOR: Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

THRU: Thomas M. Novak, Assistant Director
for Licensing
Division of Licensing

FROM: James H. Wilson, Project Manager
Licensing Branch No. 3
Division of Licensing

SUBJECT: WATERFORD 3

Enclosed is the final NRR input for Waterford 3 SALP evaluation for the period July 1, 1982 through June 30, 1983. The input has been circulated to the appropriate Division Directors for comment and their comments have been incorporated into this revision of the SALP. This represents NRR's contribution to the I&E SALP for LP&L's Waterford 3 plant for this rating period and will be presented as such at a meeting at Region IV on August 30, 1983. Contributions to this input were made by R. Benedict, L. Bender, LQB; D. Kubicki, CHEB; J. Clifford, M. Goodman, PRSB; H. Garg, J. Jackson, EQB; T. Huang, G. Hsii, CPB; and D. Perrotti, EPLB.

James H. Wilson

James H. Wilson, Project Manager
Licensing Branch No. 3
Division of Licensing

Enclosures:
As stated

cc: J. Collins, Region IV
J. Gagliardo, Region IV
W. Crossman, Region IV
G. Madsen, Region IV
[redacted], Region IV

XA Copy Has Been Sent to PDR

8309120467 XA

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

Facility Name: Waterford 3
Licensee: Louisiana Power & Light Company
NRR Project Manager: James H. Wilson

I. Introduction

This report presents the results of an evaluation of the applicant, Louisiana Power & Light Company, in the functional area of licensing activities. It is intended to provide NRR's input to the SALP review process as described in NRC Manual Chapter 0516. The review covers the period July 1, 1982 to June 30, 1983.

The basic approach used for this evaluation was to first select a number of licensing issues which involved a significant amount of staff manpower. Comments were then solicited from the staff. Finally, this information was assembled in a matrix which allowed an overall evaluation of the applicant's performance. This evaluation is based on staff input from eight review activities.

II. Summary of Results

NRC Manual Chapter 0516 specifies that each functional area evaluated will be assigned a performance category based on a number of factors. The single final rating was determined through integration of the opinions received from the NRR reviewers and the judgement of the project manager. Based on this approach, the performance of Louisiana Power & Light Company in the functional area "Licensing Activities" is rated category 2.

III. Criteria

Evaluation criteria, as given in NRC Manual Chapter Appendix 0516 Table 1, were used for this evaluation.

IV. Performance Analysis

The applicant's performance evaluation is based on a consideration of seven attributes as given in the NRC Manual Chapter. For most of the licensing actions considered in this evaluation, only three or four of the attributes were of significance. Therefore, the composite rating is heavily based on the following attributes.

(1) Management involvement
(2) Approach to resolution of technical issues
(3) Responsiveness

With the exception of Enforcement History and Reportable Events for which there was no basis within NRR for evaluation, the remaining attributes of Staffing and Training were judged to apply to only a few licensing activities. Both training and staffing were considered as unique licensing activities, under licensee qualifications.

The performance analysis was based on our evaluation of the following licensing activities:

Training
Fire Protection
Procedures
On-site Emergency Plans
Environmental Qualification
Semisic Qualification
Licensee Qualification
Core Performance

The level of licensing activities during the review period was used as a criterion in choosing the functional areas considered in this evaluation.

A. Management Involvement and Control in Assuring Quality

The overall rating for this criterion is category 2. There is evidence of planning and assignment of priorities and decision making seems to be at a level that ensures managemant review. Management involvement was particularly evident in meeting the requirements of Appendix R, Emergency Planning and Licensee Qualification. However in the area of procedures, the rating is category 3 because the applicant's approach to writing EOPs lacked prior planning. The approach to writing EOPs changed several times during the course of the review, resulting in unnecessary delays. It appeared to the staff that LP&L sought to expedite operator licensing at the expense of developing adequate EOPs. However, near the end of the rating period, plant management appears to have taken a more structured and planned approach to developing acceptable EOPs.

B. Approach to Resolution

The overall rating for this criterion was category 2. In the technical area of Fire Protection, the applicant's performance was rated category 1 because they use technically sound approaches in most cases, and display sufficient conservatism when potential for safety significance exists. However, in the case of Procedures, the rating is category 3 because applicant has not appeared to use an analytic approach to EOP

development. Many engineering judgements appeared to be made on the spot, without references or consideration of supporting documentation. Also, the applicant appeared to be extremely reluctant to use existing industry guidance (NSSS, INPO, NRC docouments). However, near the end of the rating period, LP&L appeared to have redirected their procedures development program to make more use of available supporting documentation and to use a more analytical approach.

C. Responsiveness to NRR Initiatives

The overall rating for this criterion was category 2, but in the area of core performance the rating was category 1. In general the applicant's responses are timely with very few long-standing regulatory issues attributable to licensee. The resolutions proposed by the licensee are usually acceptable. However in the area of procedures, a rating of 3 is assigned because, after more than two years of review involving two sets of EOPs, the applicant still does not have a set of approved EOPs. The applicant has demonstrated a continuing inability to discern technical errors identified during the review by Regional and NRR reviewers. However, near the end of the rating period LP&L appeared to be more sensitive to the technical problems associated with the procedures.

D. Enforcement History

There is no basis for an NRR evaluation of this criterion.

E. Reportable Events

There is no basis for an NRR evaluation of this criterion.

F. Staffing

This criterion was not broadly evaluated, but did receive an overall category 2 based largely on LP&L's performance in the area of the licensee qualification. During this SALP review period, the applicant overcame a large deficiency in staffing. Although some key positions were still vacant and overall staffing fell short of stated goals at the end of the period, the effort displayed by the licensee earned them a category 2.

G. Training

This criterion was given a rating of a category 3. Although the training department has been given greater authority in the corporate organization, this organization has not been as effective as it should have been at this stage of the licensing process. Also, there is an apparent lack of coordination between

the applicant's organziation that develops procedures and the training organization which could lead to problems in the applicant's approach to accident mitigation during operation. However, near the end of the rating period, LP&L agreed to get the operators more involved in the EOP development process, although it is still not clear how training will be coordinated with the EOP effort.

V. Conclusion

Management attention and involvement with matters of nuclear safety is evident and satisfactory performance with respect to safety is being achieved. The applicant's responses are usually timely and reasonable resolution to licensing issues are offered. However, one attribute, training, received an overall unsatisfactory rating. Also, for one of the eight technical areas evaluated, procedures, significant deficiencies in all attributes resulted in unsatisfactory ratings for the applicant's performance during this rating period. Due to the importance of proper procedures and training in the human factors area of design and operation of the plant, we believe that there is sufficient weight in these activities to cause us to give an overall rating of a weak category 2 to Louisiana Power & Light Company in the area of licensing activities.

It should be noted, however, that near the end of the rating period, LP&L underwent major personnel changes in the procedures area. Based on these personnel changes and programmatic redirection, we believe that the applicant has a significantly improved foundation from which an adequate EOP development program can be generated. In addition, there are indications that the applicant is taking appropriate steps to bring about a satisfactory resolution to the EOP issue.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SGFR:CEG
50-382

AUG 2 1983

MEMORANDUM FOR: Glen D. Brown, Chief
Technical Programs Branch
Region IV

FROM: George W. McCorkle, Chief
Power Reactor SG Licensing Branch
Division of Safeguards, NMSS

SUBJECT: SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE (SALP)
WATERFORD STEAM ELECTRIC STATION

Enclosed are our evaluations of the applicant's performance for the safeguards licensing portion of the SALP review for the subject sites during the Period July 1, 1982 through June 30, 1983.

George W. McCorkle, Chief
Power Reactor SG Licenisng Branch
Division of Safeguards, NMSS

Enclosure:
As stated

cc: J. Wilson, ORB #3, NRR
C. Thomas, NRR

CONTACT:
C. E. Gaskin, NMSS
42-74383

SALP INPUT EVALUATION

WATERFORD SAFEGUARDS REVIEW

Criteria	Category
1. Management Involvement and Control in Assuring Quality Applicant has provided little evidence of prior planning and proper prioritization of safeguards matters. Corporate and site management rely heavily upon contractors and display little knowledge of site activities.	3
2. Approach to Resolution of Technical Issues from a Safety Standpoint. Applicant meets the minimum requirements in demonstrating an understanding of safeguards issues. Approaches to technical issues are generally technically viable, sound, and conservative.	2
3. Responsiveness to NRC Initiatives Licensee provides responses in a timely manner.	1
4. Enforcement History	N/A
5. Reporting and Analysis of Reportable Events	N/A
6. Staffing (Including Management) The authority and responsibilities associated with the security organization positions are identified.	2
7. Training and Qualification Effectiveness The safeguards training and qualification program is defined and contributed to an adequate understanding of work.	2

ENCLOSURE 2

LOUISIANA
POWER & LIGHT/Waterford 3 SES/P. O. Box B/Killona, LA 70066

MIDDLE SOUTH
UTILITIES SYSTEM

October 31, 1983

W3K83-1682
Q-3-A35.02.01

Mr. Eric Johnson
Reactor Projects Branch
Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012

NOV 7 1983

Dear Mr. Johnson:

SUBJECT: Waterford 3 SES Request For Extension For Comments To USNRC SALP Report 83-28

This letter is to confirm LP&L's request for extension of submission of comments to the 1983 Systematic Assessment of Licensee Performance 83-28. LP&L requested that extension be granted to respond November 17, 1983 vice November 7, 1983. Per telephone conversation with the LP&L Senior NRC Resident Inspector October 28, 1983, NRC had granted the extension.

T. F. Gerrets
Quality Assurance Manager

TFG:SSTG

cc: R. S. Leddick, Central Records, Nuclear Records

DESIGNATED ORIGINAL

Certified By Debbie Montange

Enclosure 3

LOUISIANA POWER & LIGHT / 142 DELARONDE STREET • P.O. BOX 6008 NEW ORLEANS, LOUISIANA 70174-6008 • (504) 366-2345

MIDDLE SOUTH UTILITIES SYSTEM

November 18, 1983

ROTH S. LEDDICK
Senior Vice President
Nuclear Operations

W3K83-1793
Q-3-A35.02.01

NOV

Mr. Eric Johnson
Reactor Projects Branch
Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012

Dear Mr. Johnson:

SUBJECT: Waterford 3 SES Comments To USNRC SALP Report 83-28

The subject report provided the USNRC 1982-1983 Systematic Assessment of Licensee Performance of the Waterford Steam Electric Station, Unit 3 facility. The report provided recommended Louisiana Power & Light (LP&L) actions and the criterion on which the recommended actions were made. Louisiana Power & Light offers the attached comments concerning the evaluation of our performance.

R. S. Leddick
Senior Vice President-Nuclear Operations

RSL:WJB:JC

Attachment

cc: R. P. Barkhurst, R. F. Burski, K. S. Cook, F. J. Drummond, T. F. Gerrets, C. A. Alleman, L. L. Bass, L. F. Storz, W. M. Morgan, Central Record, Nuclear Records

SECTION IV A - SOIL AND FOUNDATION

RECOMMENDED LP&L ACTIONS: Continue management attention until a resolution is reached on this issue.

LP&L RESPONSE: LP&L Commissioned an independent engineering firm, Harstead Engineering Associates, to perform an evaluation of the cracks in the concrete base mat. Results of evaluations are a follows:

HEA Report No. 8304-1

Scope:

a. Engineering criteria employed in preparation of site.

b. Cracking and leakage in base mat.

c. Laboratory Tests performed on water and leachate samples.

d. Stability calculations performed for the Steel Containment Vessel.

Summary: "In conclusion, there is no evidence of any process which has been or could be detrimental to the structural integrity of the foundation mat."

HEA Report No. 8304-2

Scope:

a. The geometric criteria employed by Ebasco to formulate the finite model used to evaluate the structural adequacy of base mat.

b. The magnitudes and distribution of the loads employed by Ebasco to evaluate the structural adequacy.

c. A benchmark comparison between the initial HEA test run against the comparable Ebasco base mat computer analysis.

d. A detailed comparison between a final HEA computer analysis and the corresponding base mat shear and moment capacity.

Summary: "It is our conclusion that the design of the mat is extremely conservative, which, under the circumstances in which the design was carried out, we consider prudent and justifiable. Therefore, we see no need for any remedial measures or the necessity of additional analysis.

SECTION IV B - SAFETY-RELATED STRUCTURES, AMERICAN BRIDGE STRUCTURAL STEEL

RECOMMENDED LP&L ACTIONS: Assure all contractors and subcontractors provide high quality systems and fully documented work records. The licensee should strengthen the LP&L Construction QA effort.

LP&L RESPONSE: 1. As a result of the established review process for records turnover, several documentation deficiencies were identified by Ebasco QAIRG (Quality Assurance Installation Review Group).

2. During the LP&L task force audit, additional documentation problems were noted:

   a. These led to a random reinspection of physical hardware by Ebasco QA surveillance, and the initiation of SCD's 73 and 78.

3. Ebasco committed to and completed a major reinspection of accessible hardware for welding and bolting performed by American Bridge to establish corrective action for SCD's 73 and 78.

   a. Required rework is being performed by Ebasco Construction, and is 99% complete and scheduled to be completed by November 18, 1983.

   b. Records generated from this task are being processed and reviewed as Ebasco construction records.

4. Ebasco QAIRG's review of American Bridge records has been completed.

   a. Ebasco QAIRG's review of Ebasco Construction records generated from this task are approximately 65% reviewed, with an estimated completion date of December 14, 1983.

   (See response to Quality Assurance Construction, Section IV I).

SECTION IV C - PIPING SYSTEMS AND SUPPORTS (INCLUDING HVAC)

RECOMMENDED LP&L ACTIONS: Assure that all Contractors and subcontractors provide high quality systems and fully documented work records. The licensee should strengthen the LP&L Construction QA effort.

LP&L RESPONSE: To assure adequacy of records to support the work activities, the following actions have been taken:

1. The Ebasco Quality Assurance Installations Records Group has been augmented and provided additional training to assure the adequacy of the records review for turnover and transfer.

2. The LP&L Construction QA Group has been increased in manpower to provide additional reviewers. (See response to Quality Assurance Construction, Section IV I)

SECTION IV F - INSTRUMENTATION AND CONTROL SYSTEMS

RECOMMENDED LP&L ACTIONS: Continue management attention in this area until all corrective actions are completed and final documentation is transferred to LP&L.

LP&L RESPONSE: The following are the continuing actions being taken by LP&L:

1. Prior to turnover of a Startup System for Testing, LP&L QA performs a physical walkdown to assure installation is adequate to support test activity.

2. A records review is performed by Ebasco QAIRG and LP&L Construction QA to assure adequacy of documentation supporting installation.

3. Demobilization of the Mercury contract and assumption of remaining construction activities by Ebasco Construction (EC) has been accomplished. These activities of EC are being monitored by Ebasco QA and the LP&L Construction QA organizations, on an increasing basis. (See response to Quality Assurance - Construction, Section IV I).

SECTION IV G - DESIGN CONTROL

RECOMMENDED LP&L ACTIONS: The licensee should increase surveillance of design and documentation control activities and careful scrutiny of as-built systems prior to system transfer to the plant manager.

SECTION IV G - DESIGN CONTROL, (Continued)

LP&L RESPONSE: LP&L believes that corrective action taken as a result of deficiencies identified during the turnover and transfer activities provide reasonable assurance that those drawings required to operate the plant reflect as-built conditions. We will continue to review and evaluate the review activities, and initiate additional surveillances as deemed necessary.

SECTION IV I - QUALITY ASSURANCE CONSTRUCTION

RECOMMENDED LP&L ACTIONS: Ensure adequate LP&L oversight of all safety-related construction activities and that all contractors and subcontractors provide a high standard of quality. The Licensee should strengthen the Construction QA effort.

LP&L RESPONSE: Measures taken to provide greater reliability in the quality of construction activities are as follows:

1. Personnel changes within the Ebasco organization have been instituted. Positions which could effect quality have been strengthened by these personnel changes, creating a stronger quality program.

   LP&L continues to emphasize the necessity that Ebasco Quality Assurance Organization provide the overview and direct control over contractors to assure construction activities are accomplished to requirements.

2. The Ebasco QA Surveillance Group was implemented to provide additional surveillance activities beyond the scope of the subcontractors QA program. This group has been instrumental for providing increased coverage allowing potential problem areas to be identified and corrected in a more timely manner.

3. The LP&L Construction QA Group has been augmented by personnel from:

   a. MSS - used in hanger review and in-plant inspections.

   b. Contract Personnel - Used in documentation reviews and in-plant inspections.

   c. Operations QA Personnel - Used in performing audits and other support activities.

   The current staffing of Construction QA consists of thirteen people, plus Operations QA personnel as needed.

SECTION IV I - QUALITY ASSURANCE CONSTRUCTION, (Continued)

4. As Ebasco Construction (EC) assumes the remaining construction activities of the subcontractors, LP&L Construction QA has increased surveillance and audit activities of Ebasco Construction.

   A recent audit was performed by LP&L Construction QA, assisted by Operations QA, to ascertain Ebasco Construction's compliance to requirements. This audit is being processed as per the LP&L QA program. Efforts of the LP&L Construction QA organization toward the Ebasco Construction activities will be enlarged commensurate with the scope of EC activities to assure LP&L management of a continued quality program.

SECTION IV K - PREOPERATIONAL TESTING

RECOMMENDED LP&L ACTIONS: Increased management attention will be needed to verify that instrumentation and control systems will operate as designed and the present quality of the startup program is maintained by the new startup organization.

LP&L RESPONSE: LP&L intends to review the installation of the flow instruments to ensure that these instruments will operate as designed and will provide satisfactory response and indication for the operator.

SECTION IV L - PLANT OPERATIONS PREPARATION

RECOMMENDED LP&L ACTIONS: Continue present level of emphasis on developing good overall plant procedures.

LP&L RESPONSE: Emergency Operating Procedures (EOP's) Currently the approved "event based" procedures are being revised to "function based" procedures. This effort includes development of a writer's guide and training document and is expected to be completed by March 1, 1984. This effort is being conducted by Operations personnel and a Human Factors Consultant.

Technical Specifications surveillance procedures are scheduled for completion and issuance in Rev. 0 by January 1, 1984 and all required revisions in place by fuel load. This effort is being conducted by Operations personnel.

System operating procedures, off-normal procedures, general plant operating procedures and refueling procedures are undergoing review and revision by Operations personnel and will be approved and in place by January 1, 1984. Annunciator response procedure format was revised and these procedures will be approved and in place by February 1, 1984.

SECTION IV M - RADIOLOGICAL CONTROLS

RADIATION PROTECTION

RECOMMENDED LP&L ACTIONS: Management attention should continue to ensure that necessary action is taken to close the existing open items before an operating license is issued.

LP&L RESPONSE: It should be noted that an NRC inspection (83-23) conducted during the week of July 11-15, 1983 resulted in the closing of 10 of the then remaining 12 open items in radiation protection. All of these 10 items had been completed to the extent that they could have been conducted prior to the June 30 end of the SALP period. The first of the remaining open items (8204-04) involves the completion and implementation of 2 lesson plans for Health Physics Technician training. Plant Technical Training has indicated that this item will be completed by January 31, 1984. The second of the remaining open items (8204-14) involves the completion of 2 I&C procedures for calibration of Health Physics equipment. One HP procedure revision necessary for closure of the open item has recently been approved. I&C has indicated that this item will be completed by December 30, 1983.

Summary

The closing of 17 open items by the January 17-21 and July 11-15, 1983 inspections demonstrates strong management attention to radiation protection. The 2 remaining items require only minor work to close out.

RADWASTE SYSTEMS, EFFLUENT RELEASES AND MONITORING

RECOMMENDED LP&L ACTIONS: Continued management attention is necessary to ensure that the backlog of work is completed prior to issuance of an operating license.

LP&L RESPONSE: 1. The completion of the solid radwaste facility (Portable) has been delayed by approximately six (6) weeks but will be completed by January 1, 1984. The inplant system will be completed by construction after fuel load, but will not be operational due to design problems. After gaining operational experience, a re-evaluation of the inplant system will be performed to determine if this system can be modified to provide economic, reliable operation.

SECTION IV M - RADIOLOGICAL CONTROLS, (Continued)

RADWASTE SYSTEMS, EFFLUENT RELEASES AND MONITORING, (Continued)

2. The ALARA section of Health Physics in conjunction with Radwaste Department personnel has completed a second review of the TERA Corporation's ALARA Design Review of Waterford 3. The re-evaluation has examined the liquid, gaseous and existing solid waste systems, as well as looking at modifications made to these systems. An ALARA review has been performed for the new computer building and portable solidification facility. The two open items identified, 382/8322-02 and 382/8322-03, should be deleted by the NRC since Waterford 3's radwaste systems were designed and constructed prior to the recommendations of ANSI-55.2-1979, ANSI-55.4-1979 or ANSI-55.6-1979. LP&L made no commitment to use these standards in our design, construction or review process.

3. The effluent control program involves 6 HP procedures. Of these, 2 are approved, 3 are on the PORC agenda for November 10, and the remaining procedure should be completed by January 1, 1984.

4. HEPA and HECA testing will be delayed until all applicable systems have been transferred to the Plant Staff. Approximately sixty days prior to scheduled fuel load, Nuclear Consulting Services, Inc. (Nucon) will begin filter testing. It is estimated that filter testing will take approximately 20 days including loading charcoal into the units.

5. Revisions to Operations procedures on liquid, gaseous and resin waste systems necessary to address all operational aspects will be completed by January 15, 1984.

6. Nuclear Auxiliary Operator Training has been initiated on the liquid and gaseous waste systems and will be completed by fuel load. Training on the Solid Waste Management System will start in December 1983 and be completed prior to fuel load.

Summary

Of the 13 open items identified in this area, 6 items were related to construction/startup activities. Six of the remaining 7 open items have been addressed and completed and should be closed out during the next NRC inspection. The last remaining open item, Radwaste Operator Training, is currently being addressed, and will be completed in an expeditious manner.

SECTION IV M - RADIOLOGICAL CONTROLS, (Continued)

TRANSPORTATION ACTIVITIES

RECOMMENDED LP&L ACTIONS: Develop necessary procedures that include requirements appearing in the recent revisions of 10 CFR 20.311, 10 CFR 61, and 10 CFR 71.

LP&L RESPONSE: The Radwaste Department has completed all procedures pertaining to transportation and is in the process of modifying/developing its procedures to address recent revisions of 10CFR20.311, 10CFR61, and 10CFR71, which will be complete by January 1, 1984.

Summary

All open items under this area have been completed and it is felt that the NRC will close out all items pertaining to transportation. LP&L is currently making the necessary procedure revisions to incorporate recent revisions of 10CFR20.311, 10CFR61 and 10CFR71 as well as recent revisions to DOT regulations (49CFR).

CONFIRMATORY MEASUREMENTS, CHEMISTRY/RADIOCHEMISTRY

RECOMMENDED LP&L ACTIONS: Increased management attention is necessary in this area to ensure that an adequate program is implemented prior to issuance of an operating license.

LP&L RESPONSE: Of the 15 Chemistry open items discussed herein, almost half are directly related to the status of construction and startup work. These items have been worked consistent with construction progress. Lack of earlier closure of these items cannot realistically be attributed to any "lack of management attention to Chemistry." A summary of these construction-related items is listed below:

382/8212-05 Awaiting verification of tank recirc times by Radwaste Startup.

382/8212-07 Awaiting completion of Chemical storeroom in the Turbine Building.

382/8212-08 Awaiting completion of summary sample line reroute, completion of installation and startup testing of the gas analyzer panel.

SECTION IV M - RADIOLOGICAL CONTROLS, (Continued)

CONFIRMATORY MEASUREMENTS, CHEMISTRY/RADIOCHEMISTRY, (Continued)

382/8212-09 Various online instruments (all conductivity monitors) had to be returned to vendor for repair prior to startup testing and acceptance.

382/8212-10 Post accident sampling system - awaiting construction completion.

382/8212-11 Facilities - awaiting completion of primary sample line reroute and installation of the gas analyzer panel.

382/8212-15 Procedures - awaiting verification of tank recirculation times

382/8212-01 Corporate Chemistry/Radiochemistry Organization.

This item open pending "the completion of the C/RC staff with qualified personnel and final approval of program procedures".

This item has been completed and is awaiting NRC closeout.

382/8212-02 Onsite Chemistry/Radiochemistry Organization.

This item will remain open pending "the complete staffing of the Chemistry/Radiochemistry Department with qualified personnel".

The present Chemistry Department staffing requirements are:

a. 1 Department Head (vacant)
b. 2 Utility Engineers - Chemistry and Radiochemist (filled)
c. 2 Supervisors - Radiochemistry and Secondary Chemistry (filled)
d. 6 Technical Specialist
e. 4 Technicians

The Chemistry Department staff at present is lacking a Department Head and 2 technicians. Additional requirements for the technicians are 6 of the 10 available positions have to be ANSI qualified. At present the Chemistry Department has 4 ANSI qualified technicians and is actively recruiting to fill the remaining technician positions with ANSI qualified personnel.

SECTION IV M - RADIOLOGICAL CONTROLS, (Continued)

CONFIRMATORY MEASUREMENTS, CHEMISTRY/RADIOCHEMISTRY, (Continued)

382/8212-02 Onsite Chemistry/Radiochemistry Organization, (Continued):

One additional technician, ANSI qualified (Navy ELT) scheduled to start 11/28/83, this leaves only 1 technician slot open, 11/10/83.

382/8212-03 Chemistry/Radiochemistry Organization Qualifications

This item open pending "review of all resumes of the corporate and onsite Chemistry/Radiochemistry personnel and the development of selection and qualification criteria for onsite Chemistry/Radiochemistry personnel to meet, as a minimum, ANSI N18.1-1971 qualifications."

1. The present method of personnel selection is as follows:

   a. Resumes are received from Personnel Department.
   b. The resumes are reviewed for qualifications under ANSI 3.1-1978 (FSAR change pending to commit to ANSI 18.1-1971).
   c. If applicants do not meet ANSI 3.1-1978 guidelines, the resumes are returned to Personnel for filing/future use.
   d. If applicants meets ANSI 3.1-1978 guidelines, the resume is compared to the present Chemistry Technical Specialist-Nuclear and Chemistry Technician- Nuclear Position Descriptions.
   e. Those applicants whose experience compares best with the position descriptions are selected for interviews.
   f. Based on results of the interviews by supervisory personnel, job offers are made.

2. The present Position Descriptions for the Chemistry Department are used for personnel selection. The Position Task Analysis Group is presently evaluating and are revising the Chemistry Department Position Descriptions to provide a more detailed analysis of job requirements. ANSI N18.1-1971 requirements will be incorporated into these Position Descriptions.

SECTION IV M - RADIOLOGICAL CONTROLS, (Continued)

CONFIRMATORY MEASUREMENTS, CHEMISTRY/RADIOCHEMISTRY, (Continued)

382/8212-03 Chemistry/Radiochemistry Organization Qualifications, (Continued)

3. After discussions with Blair Nicholas of the NRC a change to the FSAR will be submitted to require 6 of the present 10 technician/technical specialist positions meet ANSI N18.1-1971 guidelines. This will allow for training positions with the Chemistry Department. It is not considered practicable or even possible to always have all members of the Chemistry Department fully qualified to ANSI N18.1-1978.

382/8212-04 Chemistry/Radiochemistry Training Program

This item open pending "1. Hiring of a Chemistry Training Coordinator and/or Chemistry Instructor, 2. Implementation of an official training program for Chemistry/Radiochemistry personnel, 3. Complete qualification training of all Chemistry/Radiochemistry personnel, and 4. final review of Chemistry/Radiochemistry individual personnel training records, including written exams and qualifications records."

STATUS

1. Chemistry Training Coordinator is hired.

2. The Chemistry training program has been implemented. All Chemistry technicians on site prior to June 1, 1983 have completed the course (presented in formal classroom lectures by EDS). All Chemistry technicians on site after June 1, 1983 are presently working on the training program in a self study mode.

3. Qualification of technicians currently in progress.

382/8212-05 Primary Chemistry (Radiochemistry)

This item open pending "1. Completion of primary chemistry system procedures, surveillance procedures, radiochemistry analytical procedures, instrument calibration procedures, instrument calibration check procedures, and post accident primary chemistry procedures, 2. Completion of instrument calibrations, 3. Development of detailed preparation procedures for all nuclear instrument radioactive calibration standards,.4. Development and Implementation

SECTION IV M - RADIOLOGICAL CONTROLS, (Continued)

CONFIRMATORY MEASUREMENTS, CHEMISTRY/RADIOCHEMISTRY, (Continued)

382/8212-05 Primary Chemistry (Radiochemistry), (Continued)

of detailed sampling procedures for every primary system to be sampled including sampling times for each primary sample point to produce a representative sample, 5. Verification of tank recirculation times to produce representative samples, 6. Verification of all analytical procedures using known standards."

STATUS

1. a. All primary system procedures are complete and approved.
   b. Surveillance procedure- CE-2-100 scheduled for PORC 10/27/83.
   c. Radiochemistry analytical procedures are complete and approved.
   d. Instrument calibration procedures are incorporated into radiochemistry analytical procedures and are completed and approved.
   e. Instrument calibration check procedures are also included in radiochemistry analytical procedures and are complete and approved.
   f. Post accident primary chemistry procedures are complete and approved.

2. Instrument calibration - all radiochemistry analytical instruments have been calibrated and calibrations are being maintained on instruments in routine use.

3. Chemistry Department procedure CE-3-328, "Preparation of Radioactive Calibration Sources" has been written and is awaiting Group Head approval.

4. Chemistry Department procedure CE-3-327, "Operation of the Primary Sample Panel" has been written and approved.

5. Verification of tank recirculation times is presently in progress by the Radwaste Startup Group ECD 1/1/84.

6. Verification of all analytical procedures using known standards has been completed.

SECTION IV M - RADIOLOGICAL CONTROLS, (Continued)

CONFIRMATORY MEASUREMENTS, CHEMISTRY/RADIOCHEMISTRY, (Continued)

382/8212-06 Secondary Chemistry Program

This item open pending:

1. a. Completion of secondary chemistry procedures
   b. Surveillance procedures
   c. Secondary chemical control and analytical procedures
   d. Instrument calibration procedures
   e. Instrument calibration check procedures

2. Development and implementation of detailed sampling procedures for every secondary system to be sampled including sampling times for each secondary sample point to produce a representative sample.

3. Verification of tank recirculation times to produce representative samples.

4. Completion of instrument calibration.

5. Verification of all analytical procedures using known standards.

STATUS

1. a. All secondary chemistry procedures are complete and approved.

   b. Surveillance procedure CE-2-100 scheduled for PORC 10/27/83.

   c. Secondary chemical control and analytical procedures are complete and approved.

   d. Instrument calibration procedures are included in secondary chemical control and analytical procedures and are complete and approved.

   e. Instrument calibration check procedures are also included in secondary chemical control and analytical procedures and are complete and approved.

SECTION IV M - RADIOLOGICAL CONTROLS, (Continued)

CONFIRMATORY MEASUREMENTS, CHEMISTRY/RADIOCHEMISTRY, (Continued)

382/8212-06 Secon[illegible] Chemistry Program, (Continued)

STATUS, (Continued)

2. A secondary sample panel operation procedure is not required. Most samples are continuous on line with flows controlled by the on line instruments. To obtain a grab sample from the sample panel only one valve has to be opened and the sample collected.

3. There are presently no tanks in the secondary system to which this applies.

4. All secondary analytical instruments have been calibrated and calibrations are being maintained on instruments in routine use.

5. Verification of all analytical procedures using known standards has been completed.

382/8212-07 Chemical Inventory Program

This item open pending:

1. Complete implementation of the proposed program.

2. Establishment of a safe area for storage of flammable chemicals other than laboratory amounts stored in the respective laboratories.

3. Consideration of establishment of a computer program to handle inventory and accountability of chemicals.

STATUS

1. The PMD for Chemical Inventory has been deleted. The implementing procedure CE-1-008 has established the requirements and provisions of the program.

2. A chemical and reagent storeroom is presently being constructed on the mezanime level (+40) of the Turbine building. This storeroom will have a 45 gallon capacity flammable storage locker. The storage locker is presently on site and will be installed when construction is complete. Estimated construction complete 12/1/83.

SECTION IV M - RADIOLOGICAL CONTROLS, (Continued)

CONFIRMATORY MEASUREMENTS, CHEMISTRY/RADIOCHEMISTRY, (Continued)

382/8212-07 Chemical Inventory Program, (Continued)

STATUS, (Continued)

3. A computer program has been considered for use on the ND 6620 for chemical inventory and control. At the present time a manual system is in use and is functioning well so the computer program has been assigned a very low priority as a "nice to have" but not necessary.

382/8212-08 Primary Sampling System

This item open pending:

1. Complete checkout of the primary sampling panel.

2. Completion of sampling procedures and valve lineups for use of the sampling panel.

3. Complete calibration and checkout of the automatic gas analyzer panel.

STATUS

1. Primary sample panel preop test complete, panel was tested during Hot Functional Testing and is operational. New sample lines have been completed, hydrostatic testing completed and verified. Primary sample panel is operational.

2. CE-3-327, "Operation of the Primary Sample Panel" has been written and approved. This procedure has valve lineups, sample recirc and purge times listed for each sample point.

3. The gas analyzer preop test has been completed and the H_2 and O_2 analyzers calibrated. Several minor design deficiencies were noted during the preop test. However the panel is operational and is performing as designed. Combustion Engineering is presently evaluating the current design for possible modifications.

SECTION IV M - RADIOLOGICAL CONTROLS, (Continued)

CONFIRMATORY MEASUREMENTS, CHEMISTRY/RADIOCHEMISTRY, (Continued)

382/8212-09 Secondary Chemistry Sampling System

This item open pending:

1. Complete checkout of the secondary sampling panel.

2. Completion of sampling procedures and valve lineups for use of the sampling panel.

3. Complete calibration and checkout of the process analyzers.

STATUS

1. The preop test on the secondary sample panel is completed. The panel was used during Hot Functional Testing and performed satisfactory. The secondary sample panel is operational. There is presently one CIWA to verify a sample flow from the MSR's. This was not performed during Hot Functional Testing and is the only deficiency presently carried against the secondary sample panel.

2. A secondary sample panel operation procedure is not required. Samples are continuous on line, with flows controlled by the online instruments. To obtain a grab sample from the sample panel only one valve has to be opened and the sample collected.

3. All process analyzers have been installed, tested and calibrated.

382/8212-10 Post Accident Sampling System

This item open pending:

1. Installation completion, checkout, and calibration of the proposed system.

STATUS

1. The Post Accident Sample System installation is complete and has been released to Louisiana Power & Light Startup. The system is presently being checked out by the Startup engineer and testing will commence shortly. The present system is scheduled for transfer to Plant Staff 60 days prior to fuel load. All Chemistry Department procedures for use of the system have been completed and approved.

SECTION IV M - RADIOLOGICAL CONTROLS, (Continued)

CONFIRMATORY MEASUREMENTS, CHEMISTRY/RADIOCHEMISTRY, (Continued)

382/8212-11 Controls for Effluent Releases

This item open pending completion of all effluent release procedures.

STATUS

This item is presently assigned to the Health Physics group. The Health Physic's group has identified 6 procedures necessary to meet this item, 4 release permit procedures. HP-01-231 thru HP-01-234, 1 setpoint procedure HP HP-01-235, and the ODCM HP-01-230. Of these procedures HP-01-233 and HP-01-230 are presently written and PORC approved. HP-01-231, 232, and 234 are written and awaiting PORC approval. HP-01-235 is being written and the estimated completion date is January 1, 1984.

382/8212-12 Facilities

This item open pending completion of construction and occupancy of the chemistry/radiochemistry facilities.

STATUS

Items listed as incomplete on the report.

1. Water plant laboratory was listed as temporary, incomplete.

   The water plant laboratory trailer has now been completed. Lab furniture, fume hood and utilities have been completed. The emergency generators are on site and can be used for emergency power.

2. The chemistry supervisors office -4 RAB has been equipped but is not presently occupied due to the technicians still being located in the trailer adjacent to the Administration Building. It would not be prudent to move the supervisors at the present time.

3. Primary Sample Room (-4 RAB)

   The primary sample panel has been installed, new sample line installation has been completed and sample lines have been tested. Primary sample panel is operational

SECTION IV M - RADIOLOGICAL CONTROLS, (Continued)

CONFIRMATORY MEASUREMENTS, CHEMISTRY/RADIOCHEMISTRY, (Continued)

382/8212-12 Facilities, (Continued)

STATUS, (Continued)

4. Gas Analyzer Room

The gas analyzer has been completed, tested and calibrated.

382-8212-13 Chemistry/Radiochemistry Analytical Instrumentation, Calibration and Quality Control

This item open pending:

1. Receipt of remaining instrumentation and supplies.

2. Completion of quality control procedures for analytical instruments.

3. Verification of operability and calibration of all analytical instrumentation.

4. Implementation of the instrument calibration check program.

STATUS

1. All equipment identified has been received.

2. Quality Control of analytical instruments is incorporated into several procedures, all of which are completed and approved.

3. All analytical instruments have been tested and calibrated, calibrations are presently being maintained on instruments in use.

4. Instrument calibration check program has been instituted and is in progress.

382-8212-14 Audits and Reviews

This item open pending implementation of a comprehensive audit/review program for Chemistry/Radiochemistry activities.

SECTION IV M - RADIOLOGICAL CONTROLS, (Continued)

CONFIRMATORY MEASUREMENTS, CHEMISTRY/RADIOCHEMISTRY, (Continued)

382-8212-14 Audits and Reviews, (Continued)

STATUS, (Continued)

This item has been assigned to the Operations QA group. Chemistry/Radiochemistry audits have been performed by the Operations QA Group under procedure QP-18.10.

382-8212-15 Procedures

This item open pending:

1. Completion and approval of procedures referenced in Section 18.b of this report.

2. Licensee evaluation of procedures addressed in Section 18.c of this report.

STATUS

1. Of the 9 procedures listed as "to be completed" in Section 18.b, 6 have been completed and approved, 2 procedures CE-2-100 has been written and is awaiting PORC approval.

2. Of the procedures listed in Section 18.c:

   a. Tank recirc times - at the present time tank recirc times are being calculated. When the testing is completed a Chemistry Department Standing Instruction will be written which will contain the sample points, the tank recirc times, and sample purge times.

   b. Specific detailed sampling procedures for all manually taken samples including valve lineups, labeling, handling precautions, safety considerations, and flush times to provide representative samples. Where necessary this information has been incorporated into the system chemistry procedures and laboratory general practices. A specific detailed procedure for every case is not required.

SECTION IV M - RADIOLOGICAL CONTROLS, (Continued)

CONFIRMATORY MEASUREMENTS, CHEMISTRY/RADIOCHEMISTRY, (Continued)

382-8212-15 Procedures, (Continued)

STATUS, (Continued)

2. Of the procedures listed in Section 18.c:

c. Preparation of instrument radioactive calibration standards. CE-3-328 has been written and is currently awaiting Group Head approval.

d. Determination of Lithium - covered by CE-3-400 which is written and approved.

e. Determination of Sodium - same as (d) above.

f. Determination of Radio Iodine in the Reactor Coolant System (Extraction method) - at this time a procedure of this type is not necessary. This information is provided by a gamma isotopic analysis. However if required in the future ASTM D-2334-73 method C can be used for this analysis.

g. Determination of Iodine Equivalence in the Reactor Coolant System - this is presently part of the software on the Nuclear Data System computer. (APS.IODEQ) and is run as a routine part of a gamma isotopic analysis. A separate procedure is not necessary.

h. Determination of Radiocesium in the Reactor Coolant System (Extraction method). At this time a procedure of this type is not necessary. This information is provided by a gamma isotopic analysis. However, if required in the future ASTM D-2577-72 (1977) Method C can be used for this analysis.

ENVIRONMENTAL SURVEILLANCE

RECOMMENDED LP&L ACTIONS: Management attention is necessary to close open items identified during previous inspection and that the proposed radiological effluent monitoring program is implemented prior to issuance of an operating licence.

SECTION IV M - RADIOLOGICAL CONTROLS, (Continued)

ENVIRONMENTAL SURVEILLANCE, (Continued)

LP&L RESPONSE: This SALP report, covering the period through July 1983 indicates that four previously identified open items in this area were closed, and six new open items were reported. These six open items were subsequently closed during an inspection of the Waterford 3 environmental monitoring programs performed August 22-26, 1983. No violations, deviations nor new open items were identified. The NRC inspector concluded from that inspection, "that due to LP&L's timely resolution to outstanding open items; functionally reorganizing the management structure for the operational environmental monitoring activities; and implementing the REMP (Radiological Environmental Monitoring Program) in advance to debug the program, there are no reservations in the area of the REMP to deter the issuance of an operating license to LP&L for WSES, Unit 3."

SECTION IV O - MAINTENANCE

RECOMMENDED LP&L ACTIONS: Increase management attention in the area of assigning qualified personnel to support startup activities and overall maintenance training.

LP&L RESPONSE: In October 1983, the Maintenance Department was divided into two (2) groups (Startup Maintenance and Plant Maintenance) to facilitate startup activities and ease the supervisory burden on permanent LP&L Maintenance supervisors. Startup now supervises Startup support directly. Maintenance supervision has been moved closer to Maintenance personnel and an operational maintenance environment is being stressed.

Maintenance management has emphasized to supervisors the importance of ensuring that personnel are technically knowledgeable and competent to perform assigned work activities.

Present corrective and preventive maintenance procedures require NOS authorization to commence activities and NOS notification upon termination. NOS signatures are required on corrective maintenance work authorizations and preventive maintenance task cards. A breakdown in communications during Hot Functional Testing resulted in Operations not being kept up to date on status of pressurizer level instrumentation This was corrected immediately and all supervisors were instructed on following procedures. Necessary corrective action was discussed with all Maintenance personnel.

SECTION IV O - MAINTENANCE, (Continued)

LP&L RESPONSE: (Continued)

A "Conduct of Maintenance" procedure will be implemented by December 15, 1983 and will cover:

1. Organization - to support startup, construction, outages and special projects.

2. Procedures/Instruction - to ensure that equipment is maintained to design specifications.

3. Administrative Controls - to ensure that Maintenance is authorized by the NOS (controlled maintenance) and proper documentation is maintained.

4. Personnel Qualifications and Training - to ensure that Maintenance personnel are knowledgeable and competent to perform assigned work activities.

5. Interfaces/Communications - to ensure that Maintenance personnel interface with other departments as required during the performance of their assigned work activities, i.e., keeping NOS appraised of the work status, check with Health Physics for RWP and ALARA purposes as required, QC for "witness" and "holdpoint" etc.

SECTION IV P - EMERGENCY PREPAREDNESS

RECOMMENDED LP&L ACTIONS: Management should increase its knowledge of emergency preparedness regulatory requirements and guidance criteria. Management attention should be given toward assuring that the Waterford 3 training program, equipment installation, and approved procedures are accomplished to meet the licensing schedule.

LP&L RESPONSE: Since the emergency preparedness appraisal, LP&L has been upgrading its Emergency Preparedness Program. The Nuclear Operations Department organization has been modified to include an Emergency Planning Manager who reports directly to the Nuclear Services Manager, with responsibility for all aspects of emergency preparedness. The Emergency Planning Manager has a staff directly reporting to him, as well as personnel matrixed from other organizations with in the Nuclear Operations Department, to effectively manage Waterford 3 emergency preparedness and to assure that the Waterford 3 Emergency Preparedness Training Program, equipment installations, and procedures are completed consistent with the licensing schedule.

SECTION IV P - EMERGENCY PREPAREDNESS, (Continued)

LP&L RESPONSE, (Continued):

The emergency preparedness appraisal items are being actively worked consistent with responses provided to the NRC in letters W3P83-2529 dated July 29, 1983 and W3P83-3356 dated October 18, 1983. The revisions being made to the Waterford 3 Emergency Plan and Emergency Plan Implementing Procedures will resolve many of the appraisal concerns with the balance of the appraisal concerns being handled, as appropriate, by other organizational actions.

Discussions are taking place with NRC Region IV concerning the scheduling of a follow-up appraisal consistent with our licensing schedule.

SECTION IV Q - SECURITY AND SAFEGUARDS

RECOMMENDED LP&L ACTIONS: Examine the avenues of Communication between the divided management activities of those responsible for (1) setting up the physical/electronic security systems, and (2)those who are to implement the total protection program under 10CFR73.

LP&L RESPONSE: We have established a security task force with representation from Startup, Plant Operations, Plant Security, Corporate Security, and Nuclear Services to enhance the communication avenues among the participating groups. This task force was set up well before the end of the evaluation period.

SECTION IV R - LICENSING ACTIVITIES

RECOMMENDED LP&L ACTIONS: None

LP&L RESPONSE: The SALP report rated the category "Licensing Activities" highly in the areas of Fire Protection, Emergency Planning and Core Performance. The major area of deficiency noted in the report was the lack of a structured and planned approach to developing acceptable emergency operating procedures (EOPs). However, as noted in the report, near the end of the rating period significant personnel changes occurred, including the operational areas responsible for EOP development.

Verbally in July then in September 1983 via Letter W3P83-2782, LP&L committed to a complete rewrite of the EOPs through implementation of Emergency Procedure Guidelines developed by the CE Owners Group and approved by the NRC. The Procedure Generation Package will be provided for NRC review in December, 1983 and the new EOPs will be completed by March, 1984, in time to support operator training prior to scheduled fuel load.

SECTION IV R - LICENSING ACTIVITIES, (Continued)

LP&L RESPONSE, (Continued):

During the EOP rewrite process, operator input and feedback has been actively sought. As procedures are completed they will be turned over to Training for development of lesson plans and training of operators. Additionally, both the Licensing and Operations sections have been in continuous contact with members of the NRR Procedures and Test Review Branch to maintain the NRC up to date on progress and resolve any problems. These factors combined with a structured approach to EOP development based on the requirements of NUREG 0737 Supplement 1 has resulted in an on-schedule activity which we are confident will produce a high quality set of EOPs for Waterford 3.

Appendix A, Item IV.G of the SALP report rates Training as a category 3 area. This area has been addressed in the overall Training comments provided in response to Section IV.T of the main body of the SALP report.

As pointed out in Section F of Appendix A actual staffing at the end of the SALP period was short of stated goals; however, LP&L continues with its aggressive recruiting effort and as a result several key staff positions have been filled with personnel having extensive commercial experience.

Although overall a rating of 2 was achieved in the area of licensing activities it is LP&L's intention to apply the level of Management involvement, responsiveness, and effort necessary to resolve technical issues such that a higher performance standard can be recognized during the present SALP period.

SECTION IV S - MANAGEMENT CONTROL

RECOMMENDED LP&L ACTIONS: The licensee should continue management effort to stay involved and provide appropriate oversight to all functional areas.

LP&L RESPONSE: Changes to the Nuclear Operations organization continued to a limited degree during the assessment period. Significant and more aggressive changes have occurred since July 1, 1983. The latter stated changes are designed to provide the means for LP&L to have the onsite and offsite management and technical personnel resources to complete plant construction and conduct preoperational/startup testing in a timely manner. Additionally, the most recently published structure establishes an integrated project organization to support the safe and effective routine operation of Waterford 3 and includes the capabilities to respond to any plant emergency.

SECTION IV S - MANAGEMENT CONTROL, (Continued)

LP&L RESPONSE, (Continued):

Although structural changes to the Nuclear Operations organization were formulated during the period April 11, 1983 to June 30, 1983, the actual physical restructuring primarily was accomplished subsequent to July 1, 1983. Therefore, it may be more appropriate to reserve detailed comments in regard to management control aspects of the restructured organization for the next assessment response. Suffice to say that the changes formulated during the April - June, 1983 time frame were intended to simplify communications and emphasize consistency of purpose toward that goal. Administrative and training functions were more closely integrated with their operating plant constituents, and were brought under overall control of plant management. On an interim basis, construction responsibility was reinforced by moving startup under plant responsibility. Executive actions since September 1, 1983 to current date have altered the foregoing to a certain extent and rightfully should be commented upon during future evaluation of the Waterford 3 project.

SECTION IV T - TRAINING

RECOMMENDED LP&L ACTIONS: The licensee should take advantage of the time remaining to fuel load to provide refresher training to licensed operators and STA candidates in areas for which they have been shown to be weak by qualification or certification exams. The licensee should review the program descriptions which define the training progress and consolidate or revise them, as necessary, to eliminate duplication and to provide clear overall direction to the training program.

LP&L RESPONSE:

1. A requalification training program has been formulated for licensed operators and will be initiated prior to Fuel Load. A major input to the requalification program will be areas shown to be weak on qualification and certification exams.

2. Due to a change in philosophy a new STA training program will be initiated for newly selected "full-time" STAs. In the interim, previously certified STAs will fulfill this function until other STAs are qualified. They will receive portions of the operator requalification program and requalification on topics specific to the STA function.

3. The training Program Descriptions have been eliminated and are being replaced with a Training Manual which includes detailed course descriptions and training procedures which will describe who gets trained and when. This will eliminate any confusion existing from the Program Descriptions.

SECTION IV T - TRAINING, (Continued)

LP&L RESPONSE, (Continued):

4. Regarding operator training on EOP's, as the EOPs are generated by operations personnel, training will be incrementally accomplished on these procedures. This training will start January 1984, after receipt of the approved procedures.