

APPENDIX A

NOTICE OF VIOLATION

Louisiana Power and Light Company
Waterford Steam Electric Station,
Unit 3

Lockett: 50-382
Construction Permit: CPPR-103

Based on the results of an NRC inspection conducted during the period May 14 - June 8, 1984, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 8583, dated March 8, 1984, the following violations were identified:

Failure to Conduct Quality Assurance Review of Procedures

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

Table 1 of the LP&L Nuclear Operations Quality Assurance Manual requires that the "Waterford-3 Plant Operating Manual (was to be) prepared by cognizant plant groups/departments (; reviewed) by the Plant Quality Department and PORC (; and approved) by the Plant Manager. Selected procedures that implement the QA Program require review and concurrence by the Corporate QA Manager or his designee before issue."

Contrary to the above, the selection, review, and concurrence of procedures that implement the QA Program had not been performed by the Corporate QA Manager before issue of these procedures.

This is a Severity Level IV Violation. (Supplement II) (382/8431-01)

Programmatic Breakdown in Document Control

10 CFR Part 50, Appendix B, Criterion VI requires that, "Measures shall be established to control the issuance of documents, such as instructions, procedures, and drawings, including changes thereto, which prescribe all activities affecting quality. These measures shall assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel and are distributed to and used at the location where the prescribed activity is performed."

- a. Chapter 6 of the LP&L Nuclear Operations Quality Assurance Manual requires that, " . . . (controlled) documents (are) distributed in accordance with applicable procedures and instructions Controlled

documents are distributed prior to starting an activity and, if necessary, are on hand at the locations where the prescribed activities are performed before work begins"

Contrary to the above, individual copies of the Executive Directive System Manuals were missing some of their effective directives.

- b. Chapter 6 of the LP&L Nuclear Operations Quality Assurance Manual further states that, "Controlled lists of documents are updated and issued in accordance with applicable procedures to preclude the use of superseded documents. These lists identify the current revision number of the instructions, procedures, specifications, drawings, and procurement specifications. Record copies of the documents are retained in accordance with appropriate records management procedures. Obsolete or superseded documents are controlled by approved written procedures to prevent inadvertent use."

Contrary to the above, the contents of controlled copies of the Quality Assurance Section Procedures Manual and Plant Operating Manual were not updated and accurate when compared with the respective Table of Contents and Index.

- c. Chapter 6 of the LP&L Nuclear Operations Quality Assurance Manual also states, "Those drawings required for the safe operation of the plant reflecting the as-built status of Waterford-3 are transferred from the Architect-Engineer to LP&L prior to receipt of the operating license. These drawings are stored in a controlled facility, with reproducible copies of those drawings required for plant operation and maintenance furnished to the Plant Manager. The Project Management Group is responsible for the revision and update of master drawings to reflect station modifications."

"The Project Management Group issues Station Modifications (SMs) which delineate the drawings affected by proposed modifications. The Plant Manager implements and maintains administrative controls which assure that as-built drawings utilized for plant operation and maintenance are obtained and disseminated upon completion of the related modification. The Nuclear Operations Quality Assurance Group monitors the status of as-built drawings."

Contrary to the above, posting of facility modifications to control room drawings is inconsistent with master copies in plant records.

These are three examples of one Severity Level IV Violation.
(Supplement II) (382/8431-02)

Pursuant to the provisions of 10 CFR 2.201, Louisiana Power and Light Company is hereby required to submit to this office, within 30 days of the date of this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Date: OCT 05 1984