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

Dear Mr. Leddick:

This refers to the special safety inspection conducted by members of a special NRC team on April 9-13, 1984, of activities at Waterford 3 nuclear station authorized by Construction Permit No. CPPR-103, and to the discussion of our findings with you, Mr. R. Barkhurst, Mr. K. Curley, and others of your staff at the conclusion of the inspection.

Areas examined during the inspection included the implementation of the fire protection program; and compliance with the requirements of 10 CFR 50, Appendix R, per FSAR commitments and SER evaluation. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel. These findings are documented in the enclosed inspection report.

During this inspection, it was found that certain of your activities appeared to deviate from commitments made to the NRC. These items and references to the commitments are identified in the enclosed Notice of Deviation. You are requested to respond to these deviations in writing. Your response should be based on the specifics contained in the Notice of Deviation enclosed with this letter.

Subsequent to the inspection, a meeting was held in Bethesda, Maryland, on May 2, 1984, to further discuss the inspection findings and your proposed corrective actions (short-term and long-term) to bring the plant into conformance with 10 CFR Part 50, Appendix R. At this meeting you committed to the following corrective actions with proposed completion milestones:

- Analyze the effects of a total control room or cable vault fire to ensure complete electrical isolation of safe shutdown equipment, to be complete prior to fuel load (382/8420-01 and -05).
- By December 1, 1984, analyze the effects of spurious operations caused by a fire in any plant area, and complete all resulting modifications prior to startup following first refueling outage (Open Items 382/8420-01, -05, -07, and -08).
- Prepare and issue an interim shutdown procedure which will address a fire in the control room concurrent with a loss of offsite power. The procedure will assume unavailability of the control room components and

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Mr. R. S. Leddick -3operator evacuation. The procedure will require alignment and operations of essential systems independent of the control room. Train all operating personnel prior to fuel load on this procedure (Open Item 382/8420-01). Provide the means to manually operate each atmospheric dump valve prior to fuel load (Open Items 382/8420-01 and -05). Provide the equipment necessary for independent neutron (source range) indication at the remote shutdown panel prior to startup following the first refueling outage. The revised alternative shutdown procedure identified in item 3, above, will include interim compensatory measures for the lack of neutron monitoring (Open Items 382/8420-01 and -05). Reroute the reactor coolant hot leg pressure indication cables prior to 6. fuel load to assure availability of this indication at the remote shutdown panel. Install one additional smoke detector per auxiliary component cooling water pump prior to initial fuel load (Open Item 382/8420-04). 8. Starting at initial critically, provide a continuous fire watch until an analysis is completed to determine the effects on safe shutdown of a fire in the isolation panel in the relay room. If modifications are required as a result of the analysis the fire watch will continue until the work is completed (Open Item 382/8420-07). Provide breaker lockout capability to each shutdown cooling isolation valve and revise the station procedures to establish criteria as to when the breakers can be racked in. This item is to be completed prior to fuel load (Open Item 382/8420-07). Supplement existing emergency lighting by the installation of additional 8-hour emergency lighting units in the following areas prior to fuel load: Emergency diesel generator rooms Atmospheric dump valves area Emergency feedwater area Boric acid makeup tanks area (Open Item 382/8420-09) Revise all fire protection administrative procedures prior to issuance of the operating license (Open Item 382/8420-15). Review and correct past fire protection audit deficiencies prior to the issuance of the operating license. Revise the QA Manual and update the FSAR to establish a QA commitment to the ten criteria of 10 CFR Part 50, Appendix B, which are applicable to fire protection (Open Item 382/8420-21).

- 13. Fully implement the fire brigade training program prior to issuance of an operating license (Open Item 382/8420-22).
- Revise the diesel fuel oil sampling procedure prior to initial fuel loading (Open Item 382/8420-23).

The proposed corrective actions and completion milestones are considered acceptable.

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 responses directed by this letter and the accompanying Notice 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 inspection, we will be pleased to discuss them with you.

Sincerely,

Original Signed By:
Richard P. Denise

J. E. Gagliardo, Director
Region IV Waterford 3 Task Force

Enclosures:

- 1. Appendix A Notice of Deviation
- Appendix B NRC Inspection Report 50-382/84-20

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Resident Inspector/Waterford NPS P. O. Box 822 Killona, Louisiana 70066

Mr. Jack Fager Middle South Services, Inc. P. O. Box 61000 New Orleans, Louisiana 70161

bcc w/enclosure:

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

bcc to DMB (IEO1)

bcc distrib. by RIV:

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Resident Inspector (2 copies) W. Crossman, Task Force

R. Denise, DRS&P

Force MIS SYSTEM RIV File LOUISIANA DIV. OF RAD. CONTROL 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

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