

APPENDIX A

NOTICE OF DEVIATION

Louisiana Power and Light Company

Docket: 50-382/84-20
Permit: CPPR-103

Based on the results of an NRC inspection conducted during the period of April 9-13, 1984, and in accordance with NRC Enforcement policy (10 CFR Part 2, Appendix C, 49 FR 8583, dated March 8, 1984, the following deviations were identified:

1. Amendment No. 32 of the FSAR dated June 1, 1983, states, in part, "...the installation and maintenance of these portable fire extinguishers are in accordance with the guidelines of the National Fire Protection Association (NFPA) Standard No. 10."

Paragraph 4-4.1.2 of NFPA 10 adopted in 1978 states that, "Every 6 years, stored pressure extinguishers that require a 12-year hydrostatic test shall be emptied and subjected to the applicable maintenance procedures."

Paragraph 5-3, as specified in table 5-3 of NFPA 10 adopted in 1975, requires a hydrostatic test interval for extinguishers of the dry chemical, stored pressure type, with mild steel shells to be performed every twelve (12) years.

In deviation from the above, Procedure MM-7-010, Revision 1, dated May 1, 1983, failed to list a check for the required 6-year maintenance and 12-year hydrostatic test on dry chemical, stored pressure type of portable fire extinguishers with mild steel shells. (382/8420-20)

2. Amendment No. 34 of the FSAR dated January 1984, states, in part, "The Waterford 3 SES Fire Protection Program includes administrative controls and quality assurance provisions . . . consistent with Appendix A to Branch Technical Position APCSB 9.5-1 and 10 CFR 50 Appendix R as applicable to the Waterford 3 SES design."

Appendix A to Branch Technical Position APCSB 9.5-1, paragraph C.2, states, in part, "...administrative controls...that govern the fire protection program should be prescribed by documented instructions, procedures or drawings and should be accomplished in accordance with these documents."

Amendment No. 32 of the FSAR dated June 1, 1983, states, in part, "...the following codes, standards and regulatory guidance have been used, as applicable, in the preparation of the Fire Protection Program re-evaluation...NFPA 27-1975."

Paragraph 71 of NFPA 27 adopted in 1975 states, in part, "...the brigade should be provided with equipment . . . in such numbers as to enable it to perform the service for which it is organized. This equipment should include...Personnel protective equipment...the number of each item which should be provided is according to the number of members of the brigade required to use such items of equipment at one time."

In deviation from the above, Procedure FP-1-004, Revision 2, fails to provide an adequate surveillance procedure to ensure that the minimum inventory of personnel protective equipment is verified. (382/8420-18)

Louisiana Power and Light Company is hereby requested to submit to this office, within 30 days of the date of this Notice of Deviation, 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 deviation from commitments made to the Commission; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Dated: JUL 9 1984