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August 20, 1984

ROTH S. LEDDICK
Senior Vice President
Nuclear Operations

W3B84-0473

Mr. Darrell G. Eisenhut
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Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: Program Plan for Resolution of
Pre-Licensing Issues

- REFERENCES: 1) LP&L Letter W3B84-0459, "Waterford 3 SES
Revised Program Plan" dated July 27, 1984
- 2) Public Meeting on Subject Issues held in
Your Offices on August 17, 1984

Dear Mr. Eisenhut:

On behalf of Mr. Cain, and per your request in the reference 2 meeting, this submits a revised attachment to the Program Plan, reference 1, formalizing the changes in the attachment discussed during the meeting. The attachment is re-issued in its entirety. In those instances in which changes were made, the page indicates, "Revised - 8/20/84", and the portions changed are indicated by sidelines.

The meeting was very beneficial in helping us to formulate approaches to the issues raised in your letter of June 13th, and to address all of your concerns. Please advise of any comments at your earliest convenience.

Sincerely,



R.S. Leddick

RSL:DED:pbs

Attachment

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cc: With attachment
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Mr. Darrell Eisenhut, Director
W3B84-0473
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PROGRAM PLAN

ISSUE & TITLE	DESCRIPTION OF ISSUE	LP&L APPROACH TO RESOLUTION	CURRENT ASSESSMENT
1. Inspection Personnel Issues	Verify the proper certification of site QA/QC personnel or requalify the work performed by these personnel.	<p>A verification program has been established to review the professional credentials of 100% of the site QA/QC personnel, including supervisors and managers. The discussion that follows applies to all contractors except J.A. Jones, Fegles and GEO, which are addressed in Issues 10 and 20. Criteria for certification or qualification of QA/QC personnel will be based on QA program requirements and contractual commitments.</p> <p>The adequacy of credentials to support certifications and qualifications is being reviewed. Criteria have been established to sort personnel files into 3 groups:</p> <ul style="list-style-type: none"> A. Qualifications deemed adequate B. Inadequate documentation to perform evaluation C. Qualifications questionable. <p>Other site files will then be researched and contractors contacted for personnel in groups B and C to verify their acceptability. In addition, background verifications will be performed for all personnel in all groups. If certification of an individual can not be justified, he will be placed in a fourth group designated group D (Qualification inadequate). Appropriate site nonconformance documentation will be initiated to document evaluation of safety significance and corrective actions, including reinspections of work performed as necessary.</p> <p>For Ebasco, LP&L, and other site construction related QA/QC personnel remaining on site, a reverification of proper certification is being accomplished in accordance with ANSI-N45.2.6-1973. Quality Control functions currently being undertaken as part of the walkdowns in progress are being performed by personnel reverified as qualified under ANSI-N45.2.6-1973.</p>	To Be Determined

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ISSUE & TITLE	DESCRIPTION OF ISSUE	LP&L APPROACH TO RESOLUTION	CURRENT ASSESSMENT
1. Con't	•	Initial review of qualifications if 95% complete. Background checks are 15% complete. A sample reinspection of Mercury installations is being performed by LP&L.	

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ISSUE & TITLE	DESCRIPTION OF ISSUE	LP&L APPROACH TO RESOLUTION	CURRENT ASSESSMENT
2. Missing NI Instrument Line Documentation	Verify compliance with NRC requirements for NI instrumentation installations.	<p>Prior to the NRC inspection, the Ebasco Quality Assurance Installation Records Group had reviewed the ASME Section III portions of the NI instrument installations. Full documentation on the installations under the scope of this review is available.</p> <p>The scope of this concern has been narrowed to 12 installations, 4 welded and 8 threaded. The documentation on the ANSI B31.1 portions of these instrument installations that were installed with class breaks (i.e. ASME Section III to ANSI B31.1) has also now been reviewed and is summarized as follows:</p> <ol style="list-style-type: none"> 1. Final visual inspection documentation is now available. 2. Ten installations have documented hydrostatic tests. The remaining two are HVAC welded connections and do not require hydrostatic testing. 3. Material traceability to the point of installation is not available, however, Certificates of Conformance to specification requirements are available. 4. Welder identifications are not available in all cases. However, all Mercury welders were required by procedure to demonstrate qualification for the appropriate welding process prior to being issued weldrod. 5. Nondestructive testing data is not required for these installations. <p>We have considered other design changes related to the classification of NI instrument loops and have concluded that a similar situation has not occurred.</p>	The combination of the reviews described has provided assurance that documentation is available to assure the quality installation of all NI instruments.

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ISSUE & TITLE	DESCRIPTION OF ISSUE	LP&L APPROACH TO RESOLUTION	CURRENT ASSESSMENT
2. Con't		To ensure that the documentation for all N1 instruments is consistent, the ANSI B31.1 portions of the 12 installations will be reworked, reinspected and documented in accordance with the ASME III requirements in the site program.	

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<p>3. Instrumentation Expansion Loop Separation</p>	<p>Correct separation criteria violations found in system 52A and provide a program for review of other safety-related systems for separation violations and take the necessary corrective actions.</p>	<p>NCR-W3-7702 covers the system 52A problems and has been dispositioned to remove the expansion loops in question and replace with straight tubing.</p> <p>NCR-W3-7730 was generated to track the generic concern of tubing separation. In order to provide a basis for determining the scope of our approach, a sample of 45 additional instrument installations was reinspected. Those chosen were in congested areas where separation violations would have the highest probability of occurrence. Thirteen deficiencies were found out of 276 locations, and were evaluated. None required rework.</p> <p>A QC verification of all other lines (approximately 64) with redundant tubing runs in proximity of each other has been performed.</p> <p>Of the deficiencies noted, the preliminary evaluation had determined that one rework is required.</p>	<p>Although separation violations have been found, none so far identified would affect plant safety had they been left uncorrected.</p> <p>This provides a high level of confidence that other design considerations and walkdowns (i.e. pipe rupture/jet impingement analysis, non-seismic over seismic criteria and walkdowns) in combination with the tubing separation criteria have provided adequate protection for the instrument installations.</p> <p>A final determination of safety significance will be made upon completion of the reinspection.</p>

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ISSUE & TITLE	DESCRIPTION OF ISSUE	LP&L APPROACH TO RESOLUTION	CURRENT ASSESSMENT
<p>4. Lower Tier Corrective Actions Are Not Being Upgraded to NCRs</p>	<p>LP&L shall review all FCRs, DCNs, EDNs, and T-B DNs to assure that proper corrective action was taken, including an adequate review by QA. This corrective action shall include the steps required by 10CFR50, Appendix B, Criterion XVI Corrective Action and for Construction Deficiency Reporting, 50.55(e). Also, included in this review shall be the examination of improper voiding of all other design changes or discrepancy notices that affected safety-related systems or that were misclassified as safety.</p>	<p>LP&L has to date reviewed all FCRs, DCNs, EDNs and Tompkins-Beckwith DNs cited by the NRC in the Description of Concern, as well as all voided EDNs.</p> <p>LP&L's review has established that only two of the fourteen cited FCRs/DCNs and three of the 22 cited EDNs and T-B DNs should have required an NCR. In each case however, there was no safety significance as regards 10CFR50.55e and 10CFR21. None of the voided EDNs required an NCR that was not generated.</p> <p>The response to this concern will provide an assessment of the lower tier document reporting system. It will verify that it was structured in such a manner that procedures, integral to the Quality Program, provided a sound basis for decisions regarding the severity level of documents used to report deficiencies. The assessment specifically considers QA and QC reviews of engineering/construction judgements on deficiencies as it relates to the corrective action and nonconformance requirements of 10 CFR 50 Appendix B and the reporting requirements of 10 CFR 50.55(e).</p> <p>A random sample of approximately 940 FCRs, DCNs, EDNs and T-B DNs have been formally reviewed to determine if any should in fact have been reported as NCRs. Approximately 7% should have been NCR's. None of these were judged to have been reportable under 10CFR50.55e or 10CFR21. The review also indicated that the dispositioning would not have changed had the documents been upgraded.</p> <p>No additional review is required as the sample results give a 95% confidence level that 95% of the unsampled documents contain no reportable issues or a potential change in dispositioning.</p>	<p>The current review has demonstrated that there has been adequate QA/QC involvement in all lower tier documents with regard to 10CFR50, Appendix B corrective action and non-conformance requirements. This involvement ensures that appropriate corrective actions, specific and generic, are identified.</p> <p>Our current evaluation of the examples of lower tier documents cited by the NRC demonstrates that although a small percentage should have been upgraded to NCR's under the quality program in effect, none had safety significance.</p> <p>Thus, LP&L has confidence that the sample review will provide additional evidence that the projects' system of "checks & balances" ensures that, despite isolated cases of judgemental or interpretative errors, all lower tier documents, as well as FCRs and DCNs receive adequate evaluation for safety significance.</p>

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5. Vendor Documentation Conditional Releases	<p>The concern relates to whether shortcomings in contractor's documentation, particularly Combustion Engineering's, which existed at the time the material was supplied have</p>	<p>Records associated with CE material and equipment were re-reviewed and Conditional Certifications identified. An assessment of the potential for the existence of other manufacturing open items not being tracked in the Master Tracking System (MTS) was conducted. It led to the conclusion that the potential for a similar situation existed only in areas where problems are identified off-site. As a result of this concern the following areas are being evaluated:</p> <ul style="list-style-type: none"> * Concerns noted by vendor QA Reps on Release for shipment forms. * NCRs controlled by Ebasco's Home Office * Material received at the site under manufacture, deliver and erect type contracts. <p>To date 12 of 14 CE remaining Conditional Certifications have been changed to unconditional. The remaining 2 will have Unconditional Certifications by 9/15/84. The issues that required resolution deal with technical manuals and have no effect on equipment operation.</p> <p>The review conducted on the other three areas of potential concern is complete. No items adversely affecting plant safety were identified.</p>	<p>The existence of Conditional Certifications on CE equipment reflected incomplete Purchase Orders, not hardware or software deficiencies.</p> <p>No items of safety significance have been found on the other been corrected. site relating to material to be shipped to the three areas of concern.</p>

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6. Dispositioning of Non-conformance and Discrepancy Reports	Some Ebasco and Mercury NCRs and Ebasco DRs were questionably dispositioned and LP&L shall propose a program to assure all NCRs and DRs are appropriately upgraded, adequately dispositioned and corrective action completed and that any problems detected are corrected.	<p>First, the in-place program for handling of lower tier documents such as DRs will be discussed.</p> <p>Second, the specific NCRs and DRs cited by the NRC have been evaluated for proper designation, disposition, and implementation of corrective action under the existing quality program. Six of the fifty NCRs were determined to not have been adequately dispositioned and are under evaluation.</p> <p>Third, a program review of Ebasco NCRs was started by LP&L in January, 1984 to assess the validity of the disposition, the corrective action taken, the completeness of the documentation, and their proper closure. Approximately 499 (6%) of the more than 7750 NCRs reviewed have been identified as having potential deficiencies in the above attributes. These are being evaluated. The deficiencies that have thus far been evaluated have no safety significance.</p> <p>Fourth, a field verification will be conducted on a random sample of 124 of the potentially deficient Ebasco NCRs to ensure that the hardware and/or software corrective action has been completed.</p> <p>Finally, the Mercury NCR's and Ebasco DR's cited by the NRC have been reviewed against the attributes mentioned in the concern. Information from this review is currently being evaluated.</p>	<p>To date none of the potentially deficient NCRs that have been reviewed and evaluated have safety significance.</p> <p>A final determination of safety significance will be made upon completion of the evaluations of potentially deficient NCRs and the field verification.</p>

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7. Backfill Soil Densities	Conduct a review of all soil packages for completeness and technical adequacy. Where records are missing or technical problems are defined, take corrective action.	<p>A review of backfill records (i.e. backfill soil density laboratory test data and inspection reports) was initiated to determine completeness and technical adequacy. A three stage program for the evaluation of soil backfill densities was implemented to (a) locate all backfill soil data, (b) review the test records for completeness and utilize these for the construction of relative density overlay plots, and (c) evaluate documentation and overlays for compliance with specification requirements.</p> <p>It was determined that a complete set of soils test data exists at the site, and that the field and laboratory testing and insitu relative density of the class A backfill were in compliance with specification requirements.</p> <p>A review for completeness of the remainder of the soil package data for attributes other than density, which includes all inspection reports, is complete; results indicate specifications were met.</p>	The soil density is in compliance with specification requirements.
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8. Visual Examination of Shop Welds during Hydrostatic Testing	Document inspections of shop welds during hydro tests or otherwise verify such inspection.	Shop welds were inspected and accepted during hydrostatic tests by an Authorized Nuclear Inspector. The ASME N-5 code data reports also confirmed that there was inspection of shop welds. The methodology of the field hydrostatic tests provided additional assurance that shop welds were inspected. A statement from the authorized Nuclear Inspector has been received confirming that shop welds were inspected.	No deficiency exists.

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9. Welder Certification	Locate missing documents for instrument cabinet welds and determine if welders were appropriately certified. Take appropriate action to assure the quality of the supports if documentation cannot be located.	NCR W3-7549 was generated on 2/1/84 to track this problem. No documentation was found on three of the eighteen cabinets and partial documentation found on four. All seven were reinspected and found acceptable after evaluation by Engineering. As a result of the missing documentation, a review is being performed to determine other miscellaneous cases where J.A. Jones performed welding. Documentation for the welding identified will be reviewed or inspection performed where required.	All welding evaluated to date has been found acceptable. A final determination of safety significance will be made upon completion of the review.

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ISSUE & TITLE	DESCRIPTION OF ISSUE	LP&L APPROACH TO RESOLUTION	CURRENT ASSESSMENT
10. Inspector Qualification (J. A. Jones and Fegles)	Verify the proper certification of QA/QC personnel and evaluate the impact of any deficiencies found.	<p>A verification program has been established to review the professional credentials of 100% of the site QA/QC personnel for J.A. Jones and Fegles, including supervisors and managers. Criteria for certification or qualification of QA/QC personnel will be based on QA program requirements and contractual commitments.</p> <p>The adequacy of credentials to support certifications and qualifications is being reviewed. Criteria have been established to sort personnel files into 3 groups:</p> <ul style="list-style-type: none"> A. Qualifications deemed adequate B. Inadequate documentation to perform evaluation C. Qualifications questionable <p>Other site files will then be researched, and J.A. Jones and Fegles contacted for personnel in groups B and C to verify their acceptability. In addition, background investigations will be performed for all personnel. If certification of an individual cannot be justified, he will be placed in a fourth group designated group D (Qualification inadequate). Appropriate site nonconformance documentation will be initiated to document evaluation of safety significance and corrective actions, including reinspection of work performed as necessary.</p>	To Be Determined

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11. Cadwelding	Provide the cadweld data for the project in such a form that it can be readily compared to the testing criteria used for the Waterford 3 project with data broken down by various categories. Provide data on welder qualification and requalification including dates.	<p>The cadweld records have been transcribed onto computer data storage. This includes the placement area, cadweld number, cadwelder, bar size, bar position, visual test, production test, sister test, cadwelder qualification dates and inspector name and qualification dates.</p> <p>In this form the cadweld data can be called up by any of these attributes to expedite review for specification compliance or other reason. Also, physical location of cadwelds may then be readily obtained by reference to the concrete placement lift diagrams which locate the placements.</p> <p>Prior reviews have already been accomplished under NCR W3-6234 (opened 5/16/83) and nonconforming conditions resolved. A re-evaluation is being conducted now that the cadweld data is in a more systematic, auditable format.</p>	Based on the previous disposition of NCR W3-6234, there is no reason to anticipate any significant deficiency.

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12. Main Steamline Framing Restraints	Complete the document- ation for all connections in the steam generator framing.	<p>SCD 78 was resolved and subsequently reopened upon discovery that inspections in the steam generator framing were not complete. NCR-W3-7736 was issued to track resolution of the deficiency. A 100% QC reinspection of steam generator framing connections as well as a review of the American Bridge work-scope against the scope of SCD 78 reinspections was performed.</p> <p>This verified that only steam generator framing connections were omitted from the original scope of SCD 78. Reinspection of all American Bridge bolted connections is complete. Corrective Action is in progress.</p>	All corrective action is in progress in accordance with the criteria stated in the SCD 78 Documentation Package.

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13. Missing NCRs	<p>LP&L shall obtain the missing NCR's, explain why these NCR's were not maintained in the filing system, review them for proper voiding, and assure that when an issue is raised to an NCR, it is properly filed for tracking and closure.</p>	<p>The concern specifically stated that there were 10 NCR numbers missing from the QA vault and card index file. This is correct and is due to the fact that all of these NCRs were voided or cancelled prior to issuance as indicated in the manual log that was maintained at that time. The purpose of the card index file is to locate NCRs which are actually on file in the vault, not those that were voided or never issued.</p> <p>However, in response to the NRC's general statement that "Others were also noted to be missing from the Ebasco QA Vault", LP&L has:</p> <ul style="list-style-type: none"> *Reviewed for accountability all Ebasco Site and New York Office issued closed or voided NCRs for accountability (8200 total NCRs). *Provided substantiating evidence on those NCRs indicated as void in the logs. *Provided substantiating evidence that NCR numbers in the sequence indicated not to have been assigned to an NCR is correct. <p>A review of all Mercury NCR's to insure they were properly filed, tracked and closed is in process.</p>	<p>As a result of the review of Ebasco NCR's, all not on file in the QA vault were either found, located or probably not issued.</p>

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14. J. A. Jones Speed letters and EIRs	<p>During the Ebasco QA review of J. A. Jones speed letters and engineering information requests, several items that could affect plant safety were noted. Based on its sample of these actions, the staff does not expect that any of these items will significantly affect plant safety. Nevertheless, the applicant should complete the actions identified in these reviews and issues raised shall be resolved promptly.</p>	<p>First, a review has been conducted of correspondence between J. A. Jones and Ebasco via Speed letters and EIRs. Second, correspondence which conveyed design changes to J. A. Jones without reference to follow-up action to formalize the changes was conducted to determine safety significance.</p> <p>Of approximately 1100 J.A. Jones documents reviewed, 271 appear to convey design changes. These 271 have been evaluated and researched on a case-by-case basis and determined to be acceptable as is even though they represent a procedure violation. No safety problems have been identified.</p> <p>Third, a minimum of 10% of engineering information requests generated by other safety-related contractors was sampled to determine if they used design changes conveyed by such informal documents. The sample size was expanded depending on the results of the initial review.</p> <p>Fourth, any design changes identified are being reviewed for safety significance.</p> <p>The initial review of the other safety related contractors has been completed. No safety related problems have been identified to date.</p> <p>Additional sampling is being performed on three contractors.</p>	<p>No problems of safety significance were found in the J.A. Jones correspondence. The review of other contractors is nearing completion and no problems of safety significance have been found to date.</p>

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15. Welding of "D" level Material Inside Containment	Locate the documentation for "D" level material welding and verify the adequacy of the information or perform a material analysis and NDE work, or rework the welds.	<p>The CB&I QA manual requirements for documentation of fit-up and final weld inspections do not apply, per their manual, to "D" material welds. This documentation is therefore not available for all "D" material welds.</p> <p>The "D" material welds were performed by the same welders and inspected by the same welding supervisors and to the same standards as the rest of the CB&I work for which documentation is provided. Considering this, and the quality of CB&I work on this project, it is not expected that any quality problem exists with "D" material welds. LP&L will, however, in accordance with a formal QA procedure:</p> <ul style="list-style-type: none"> ° Strip paint off of a 5% sample of "D" material welds for which no documentation is available and provide full visual inspection. ° Reinspect another 5% sample of "D" material welds without stripping paint. <p>The results of this reinspection will determine if there is a need to expand the sample size.</p> <p>To address the NRC's specific concerns, Ebasco has evaluated the containment spray piping weld attachments. All containment spray piping weld attachments were installed and documented by Tompkins-Beckwith except for two. The results so far demonstrate that failure of these two welds will not preclude the piping from performing its design basis function. Ebasco is presently finalizing the analysis by redistributing the loads to other supports under the assumption that the two "D" level attachments do not exist.</p>	Preliminary results from the ongoing inspection indicate that the "D" material welds are acceptable. A final determination of safety significance will be made upon completion of the reinspection.

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16. Surveys and Exit Interviews of QA Personnel	LP&L should develop and implement a formal program for handling issues raised by individuals. One of the first tasks to be dealt with by the program should be the review of the responses previously provided to the QA survey and during the exit interviews.	LP&L has secured the services of Quality Technology Company (QTC) to implement an enhanced program to conduct exit interviews of personnel departing the site. QTC will also review the interviews conducted to date to assess whether the corrective actions for the concerns identified thereon are appropriate. Procedures have been approved which assure management involvement.	Reviews to date have not identified safety concerns not already identified.

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17. QC Verification of Expansion Anchor Characteristics	The NRC is concerned whether there was sufficient QC verification of the characteristics necessary to ensure proper installation of concrete expansion anchors installed by Mercury.	<p>The review of this matter indicates that six of the seven cited QC reviews were made as required by the drawings which were referenced on the inspection forms. This was substantiated by a thorough review of Mercury quality records. LP&L will prepare a response discussing the incorporation of drawings into the procedure, training of Mercury personnel, the QC review and substantiation of records and evaluation of the cause of the problem.</p> <p>The seventh attribute cited by the NRC is spacing between anchor and embedded plate. The response will refer to Ebasco design drawings which allow anchor plates to overlap and be welded to embedded plates. It will also provide the results of an analysis performed on worst case situations of Mercury anchor plates butting up against embedded plates of different sizes which demonstrates that the anchor and embedded plates are still capable of withstanding the original design loads.</p> <p>Since LP&L is performing a sample reinspection of Mercury installations, attributes have been incorporated into the program for spacing and embedment. This will provide assurance that installations are according to design.</p> <p>No revision is necessary to procedure SP-666 since this procedure is no longer in use at the site.</p>	The review of Mercury QA records conducted by Ebasco prior to LP&L turnover, the resultant field verifications, and the directions provided by the documents referenced in the Mercury Expansion Anchor Procedure provide assurance that QC verification was adequate.

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18. Documentation of Walkdowns of Non-Safety Related Equipment	Documentation should be provided that clearly shows what equipment was reviewed during the walkdowns and on what bases it was concluded that the installation was acceptable.	<p>Documentation attesting to the scope, conduct and results of the walkdowns will be provided. LP&L will provide documentation that shows the equipment that was reviewed during the walkdowns.</p> <p>The response to this issue will also establish that in our opinion, the design and installation adequately considered the effects of interactions of non-seismic with safety-related systems during an SSE.</p> <p>In addition, a walkdown of the non-safety related portions of the Instrument Air System in the Reactor Containment Building, Reactor Auxiliary Building and the Fuel Handling Building will be performed. The walkdown will be accomplished utilizing an LP&L procedure and a multi-discipline Engineering Group.</p>	The design and construction of Waterford-3 considered interactions of non-seismic Mechanical, Electrical, HVAC, Civil and Instrumentation equipment with safety-related equipment. That walkdown verified that such interactions do not constitute a safety concern.

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19. Water in Basemat Instrumentation Conduit	Review all conduit that penetrates the basemat and terminates above the top of the basemat to assure that these potential direct access paths of water are properly sealed.	<p>A walkdown was performed which identified 28 places where wetness due to seepage from conduits was found and 12 places where evidence of past leaking from conduits was found. Neither the present slow seepage thru some of the seals nor the seepage that would result from a gross failure of the seals presents a flooding hazard. The decision to replace the seals will be based strictly on operational and maintenance considerations. Any replacement seals will consist of a light density silicone elastomer which has the capability to stop the seepage.</p> <p>Temporary conduits which enter the basemat from outside, and which once allowed passage of ground water in quantities that required periodic pumping, have now all been pressure grouted and their temporary blockout pits filled with concrete and no longer serve as a leak path for ground water.</p> <p>Two piezometers still in use utilize one riser which will be sealed with a light density silicone elastomer. The standpipe of one piezometer no longer in use will be pressure grouted.</p>	There was never a path for ground water to flow in sufficient quantity to flood the auxiliary building basement, even before the seals were installed and before the temporary conduits were grouted. The floor drain and sump pump system was more than adequate to handle the quantity of water which entered the building during construction, and is adequate to handle the much reduced quantity presently observed.

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ISSUE & TITLE	DESCRIPTION OF ISSUE	LP&L APPROACH TO RESOLUTION	CURRENT ASSESSMENT
20. Construction Materials Testing (CMT) Personnel Qualification Records.	Verify the proper certification of construction materials testing personnel.	<p>GEO has been contacted to assist in providing additional background information or justification for certification of QA/QC personnel identified as part of NCR #W3-F7-116.</p> <p>A verification program has been established to review the professional credentials of 100% of the GEO CMT site QA/QC personnel, including supervisors and managers. Criteria for certification or qualification of QA/QC personnel will be based on QA program requirements and GEO's contractual requirements.</p> <p>The adequacy of credentials to support certifications and qualifications is being reviewed. Criteria has been established to sort personnel files into 3 groups.</p> <p>A. Qualifications deemed adequate. B. Inadequate documentation to perform evaluation. C. Qualifications questionable</p> <p>Other site files will then be researched, and GEO contacted for personnel in groups B and C to verify their acceptability. In addition, background investigations will be performed for all personnel. If certification of an individual can not be justified, he will be placed in a fourth group designated Group D (Qualification inadequate). Appropriate site nonconformance documentation will be initiated to document evaluation of safety significance and corrective actions, including reinspection of work performed as necessary.</p> <p>For GEO QC Inspectors remaining on site, a reverification is being completed of proper certification in accordance with ANSI-N45.2.6-1973.</p>	<p>The initial evaluation of this concern indicated "no safety significance" based on evaluation of nonconformance report #W3-F7-116. We are again reviewing the qualifications of QA/QC personnel on the nonconformance report and others to reconfirm our initial evaluation.</p>

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21 LP&L Construction System Status and Transfer Reviews.	A concern exists over whether construction deficiencies were properly closed out or identified during the process of transferring systems from construction to plant operations.	A review of transfer correspondence on the systems which were the cause of this concern has been performed. A review has also been conducted to verify that deficiencies in transferred systems had no impact on testing. A review was also conducted of hardware and software comments generated during status and transfer of safety-related systems.	A review of 100% of turnover/transfer correspondence showed no additional correspondence was outstanding beyond that previously identified. Deficiencies identified on the outstanding correspondence (13 SUS) have been reviewed by LP&L start-up/operations and it was determined that there was no impact on testing.

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ISSUE & TITLE	DESCRIPTION OF ISSUE	LP&L APPROACH TO RESOLUTION	CURRENT ASSESSMENT
22. Welder Qualification (Mercury) and Filler Material Control (Site Wide)	<p>Verify welder qualifications or assure the quality of all welds.</p> <p>Provide engineering justification for the allowance of "rebake" temperatures and holding times that differ from the requirements of the ASME and AWS Codes.</p>	<p>The welder documentation is available which demonstrates that the welders were properly qualified.</p> <p>The response summarizes the site requirements for handling of welding electrodes and demonstrates that ASME code requirements are met; and that AWS D1.1 code requirements, through a documented deviation to the holding oven temperature, are also met.</p>	<p>All welders were found to be properly qualified. NCR-W3-7724 addressed and resolved qualification sheet errors for 3 welders (clerical errors which were committed after the welders left site).</p> <p>Code requirements for receiving shipping, storage and issuing and control of welding electrodes were met.</p> <p>The only deviation from explicit code requirements was a documented reduction in specified holding oven temperatures.</p>

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ISSUE & TITLE	DESCRIPTION OF ISSUE	LP&L APPROACH TO RESOLUTION	CURRENT ASSESSMENT
23. QA Program Breakdown between Ebasco and Mercury.	LP&L shall provide an assessment of the overall QA program and determine cause of the breakdown, together with corrective action to prevent recurrence. This overall assessment is necessary to provide assurance that the QA program can function adequately when the plant proceeds into operation.	<p>First, LP&L is conducting a thorough review of the corrective actions associated with the 1982 NRC enforcement actions and civil penalty to determine the adequacy of follow-up related to corrective action commitments.</p> <p>Second, LP&L is conducting a thorough review of its QA audit program which has been in effect since July 1982. Particular attention will be placed on audits related to Mercury activities. This review will include an evaluation of the methods used for determining cause of identified problems and the systems used to assure effective follow-up and continued compliance with corrective action commitments.</p> <p>Third, LP&L is performing an overall assessment of the LP&L QA construction program based on the results of the above reviews to identify lessons learned and to determine if any improvements are required to assure adequacy of future operational QA program activities.</p> <p>The above actions are ongoing. Based on efforts to date, it is believed that LP&L can demonstrate that the extensive management and quality assurance actions taken by LP&L, Ebasco and Mercury subsequent to June, 1982, were appropriate; that most of the problems identified were part of the corrective actions on work previously done and are not indicative of continued inferior performance; and that the partial program breakdown did not persist.</p>	To date the specific issues involve inadequate or inconsistent closure documentation, and not hardware impacting concerns. Thus far the review indicates that there are no open items affecting plant safety.

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