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NUS-W3-A744
 October 31, 1984

50-382

Mr. J. M. Cain
 President and Chief Executive Officer
 Louisiana Power and Light Company
 317 Baronne Street
 New Orleans, LA 70160

Dear Mr. Cain:

Pursuant to your request, the Task Force is submitting this interim report on its validation activities of the LP&L responses to the 23 issues identified in the June 13, 1984, NRC letter to you.

The Task Force understands that this interim report is to support fuel load and start-up activities through completion of precritical testing.

The current status of the Task Force validation efforts can be summarized as follows:

1. Final Task Force reports have been submitted to you and to the NRC on 8 of the 23 issues (these reports address Issues 2, 3, 5, 7, 8, 11, 12, and 19). These reports state the Task Force's conclusion that these issues represent no constraints to fuel load or power operation when corrective action identified for N1 instrument lines is completed.
2. The Task Force validation efforts on 5 of the 15 remaining issues are complete, and the final reports are in preparation. These issues are 9, 13, 15, 21, and 22. The Task Force validation efforts on these 5 issues have not identified any constraints to fuel load or power operation. The final reports on these 5 issues are scheduled to be issued by November 2, 1984.
3. The Task Force validation efforts on the following five (5) responses submitted by LP&L are as follows:

<u>Issue No.</u>	<u>Percent Completion</u>	<u>Scheduled Final Report Date</u>
6	80%	November 9, 1984
14	80%	November 9, 1984
16	90%	November 16, 1984
17	95%	November 9, 1984
18	90%	November 16, 1984

The Task Force validation efforts on these issues to date have not identified any constraints to fuel load or precritical testing. If any significant deviations from the submitted responses are noted as a result of the continuing validation efforts, they will be immediately brought to your attention.

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4. Task Force validation of Issue 23 is about 15 percent complete. Considering the orientation of Issue 23 to "lessons learned," the Task Force does not expect validation efforts to impact fuel load or precritical testing. Similarly, the Task Force validation of Collective Significance is in the initial phase, but the Task Force does not expect validation efforts to impact fuel load or precritical testing.
5. Task Force validation of Issue 4 is about 15 percent complete (including 50 percent completion of TB-DN's). To date, no problems of safety significance have been identified, and no constraint to fuel load or precritical testing is known to exist. The Task Force expects to complete validation of Issue 4 in about three weeks, and if any significant deviations are discovered during the ongoing validation, the Task Force will notify you immediately.
6. The Task Force validation of Issues 1, 10, and 20 is now in its early stages. Based on this initial validation, the Task Force concludes that the LP&L qualification/verification process for QA/QC personnel is being properly implemented. In the case of Mercury, where a substantial number of inspectors were judged to be not qualified, substantial reinspection was performed by LP&L. Although not yet validated, the reported effort to date demonstrates the acceptability of the Mercury work without significant rework.

In the case of other contractors, the Task Force expects that no significant rework should be necessary. This conclusion is based on a number of factors, including:

- a) The validation effort carried out for these and other issues shows that the workmanship at the plant is quite good (i.e., where reinspection has been performed, no significant rework has been required).
- b) Nearly all of the QC personnel were given some training on site and subjected to standard tests to provide a minimum level of competence (even in those cases where the individual was later judged to be not qualified by experience or education).
- c) The use of an independent contractor (GEO) by LP&L to perform NDE, the presence of the Authorized Nuclear Inspector, and other over-inspections by LP&L and EBASCO provide substantial additional assurance that significant discrepancies were detected and corrected.
- d) Plant construction and start-up tests have demonstrated the integrity of the systems involved. As supported by our August 31, 1984, letter, the plant staff has also carried out safety analyses of all systems needed for fuel load and precritical testing, giving specific consideration to the potential safety significance of all items raised by the 23 issues that are the subject of the Task Force effort.

Based on these considerations, the Task Force concludes that Issues 1, 10, and 20 should not constrain fuel load or precritical testing. As the Task Force validation effort progresses on these three issues, the Task Force will immediately notify you if any significant deviations from the responses are found.

The Task Force, based on its validation activities to date, supports the LP&L position stated in your October 5, 1984, letter to Mr. Eisenhut that fuel load and precritical testing activities pose no risk to public health and safety.

Sincerely,

*Robert L. Ferguson
by L.L. Humphreys*

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cc Mr. Darrell G. Eisenhut