

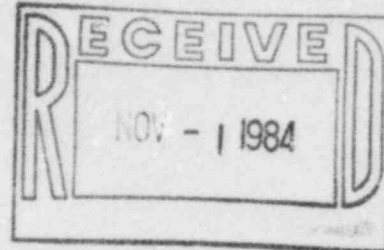
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October 31, 1984

W3P84-2966
Q-3-A35.07.101
3-A1.01.04

Mr. John T. Collins
Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011



Dear Mr. Collins:

Subject: Waterford 3 SES
Docket No. 50-382
SIGNIFICANT CONSTRUCTION DEFICIENCY NO. 101
"Traceability of Stainless Steel Instrumentation Tubing"
Final Report

- References:
1. LP&L letter W3P84-2582 dated September 18, 1984.
 2. NRR letter dated June 13, 1984 from D.G. Eisenhut to J.M. Cain (LP&L).
 3. LP&L letter W3P84-2822 dated October 4, 1984.

Reference 1 reopened the subject deficiency because of ongoing efforts associated with resolution of issues in reference 2. By reference 3 we informed you that LP&L anticipated submittal of the final report on SCD-101 by October 31.

Our review of the issues resolutions against the previously submitted final report SCD-101 has been completed and modifications were incorporated as necessary in the revised report. Attached are two copies of the revised final report of SCD-101.

Very truly yours,

K.W. Cook
Nuclear Support & Licensing Manager

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KWC:GEW:sms

cc: NRC, Director of I&E (15 copies)
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IE-27

FINAL REPORT
SIGNIFICANT CONSTRUCTION DEFICIENCY NO. 101 R1
"TRACEABILITY OF STAINLESS STEEL (SS) INSTRUMENTATION TUBING"

INTRODUCTION

This report is submitted pursuant to 10CFR50.55(e). It describes the possibility that 0.049" Stainless Steel tubing could have been installed where 0.065" wall S.S. tubing was specified. This possibility exists for both 3/8" and 1/2" S.S. tubing. In addition, 1/4" O.D. S.S. non-safety related tubing may have been installed in safety related systems.

To the best of our knowledge, this deficiency has not been reported to the NRC pursuant to 10CFR21.

DESCRIPTION OF PROBLEM

During review of documentation it was discovered that some S.S. tubing with a wall thickness of .049" had been received on site. There is concern that it may have been installed where .065" wall is required. In addition, this review discovered that some 1/4" O.D. S.S. tubing was purchased as non-safety related and may have been installed in safety related systems.

SAFETY IMPLICATIONS

Based upon the research by Engineering and Quality Assurance that found the tubing installed meets the requirements of design, the deficiency would not have affected adversely the safety of operations throughout the expected lifetime of the nuclear power plant.

CORRECTIVE ACTION

Engineering determined a temperature/pressure guideline for the acceptance of .049" wall tubing. A systematic search was performed to identify any tubing subjected to conditions outside the above parameters. Installation documentation packages, for the tubing identified, were reviewed. The tubing for which there was no heat number documented showing .065" wall thickness tubing was installed, was ultrasonically tested to determine the wall thickness. All tubing tested was found to have a wall thickness greater than .065".

A review of all safety related tubing installation packages identified 23 OCR packages for which no material traceability was found for the 1/4" tubing. Of these 23 OCR Packages, seven contained NI instruments that were included in the exclusion allowed by DCN-IC-232 R1. However, in accordance with commitments made to the NRC under Concern No. 2 (Letter from D. G. Eisenhower to J. M. Cain dated June 13, 1984), 6 of these instruments were included in those that are being reworked to comply with the applicable requirements of 10CFR50 Appendix B. The remaining instrument was field verified and documented to be in compliance with 10CFR50 Appendix B. The open work items are being tracked under the LP&L program via CIWA's.

This report is submitted as a revised Final Report.