

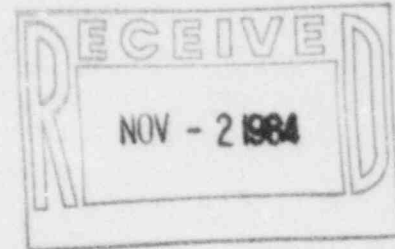
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October 30, 1984

W3P84-2968
Q-3-A35.07.108
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. 108
"Failure to Comply with FSAR Safe Shutdown Commitments"
Final Report

Reference: LP&L letter W3P84-2740 dated September 28, 1984

The referenced letter stated that the final report on SCD-108 was scheduled for submittal by October 31. In accordance with 10CFR50.55(e)(3), enclosed are two copies of the LP&L final report on SCD-108.

Very truly yours,

K.W. Cook
Nuclear Support & Licensing Manager

KWC:GEW:sms

Enclosure

cc: NRC, Director, Office of I&E (15 copies)
NRC, Director, Office of Management
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FINAL REPORT OF

SIGNIFICANT CONSTRUCTION DEFICIENCY NO. 108

"FAILURE TO COMPLY WITH FSAR SAFE SHUTDOWN COMMITMENT"

INTRODUCTION

This report is submitted pursuant to 10CFR50.55e. It describes a deficiency in the implementation of the 10CFR50 Appendix R FSAR Safe Shutdown Analysis (SSA). The description that follows only addresses those deficiencies in the SSA which reflect a failure to meet FSAR commitments. This problem is considered reportable under the requirements of 10CFR50.55e and has not been identified to the Nuclear Regulatory Commission pursuant to 10CFR21. Findings stemming from the NRC Fire Protection Audit of April 9-13, 1984, which reflect the NRC's nonconcurrence with certain FSAR SSA commitments and assumptions are not included. These will be handled separately as part of the overall Audit Corrective Action Plan.

DESCRIPTION OF PROBLEM

In the interim report dated May 11, 1984, it was stated that the following modifications were required to meet the FSAR commitments to protect all essential cables from the effects of a cable vault fire:

- RCS pressure indication cabling was to be rerouted to insure its availability.
- Access to the Atmospheric Dump Valve (ADV) handwheels shall be upgraded to facilitate local manual operation and emergency lighting would be provided for associated areas. Subsequently, it was determined to provide local pneumatic control for the ADVs in lieu of upgrading direct handwheel access.

The work associated with the above modifications is complete. The documentation is in the review process.

Subsequent to the Appendix R audit, a review was conducted to determine the minimum equipment necessary to achieve and maintain safe plant shutdown after a cable vault or control room fire. The results of this review were reflected in FSAR Table 9.5A-2C (Minimum Equipment Available and Sufficient to Achieve and Maintain Safe Plant Shutdown for Cable Vault and Control Room Fire by Performance Goal, Assuming Offsite Power Not Available). This table was submitted as part of FSAR Amendment 36 in May, 1984.

During the course of review and validation of this table, additional modifications have been identified which are needed to meet the FSAR commitments. They are:

- Seven additional cables must be rerouted and one new cable routed to protect the Emergency Diesel Generator, Pressurizer Heaters and the Cooling Unit for the Switchgear Area (AH-25) from the effects of a cable vault fire.

- Additional circuit modifications must be made to assure the availability of the pressurizer heaters from the effects of a cable vault fire.
- Additional circuit modifications must be made to assure the availability of AH-25 after a cable vault fire. Specifically this includes circuit modifications for isolation and a key lock switch for restart of the unit.

Implementation of the above described modifications will allow Waterford-3 to meet its PSAR commitment regarding safe shutdown after a cable vault fire as stated in PSAR Section 9.5.1 and Table 9.5A-2C.

SAFETY IMPLICATIONS

If left uncorrected, a fire in the cable vault could potentially have required the need for extensive manual operations and repair to provide the availability of the cited safe shutdown components.

CORRECTIVE ACTION

The modifications described will be completed by fuel load.

The open work items are being tracked under the LP&L program via CIWA's.

W3P84-2968

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