



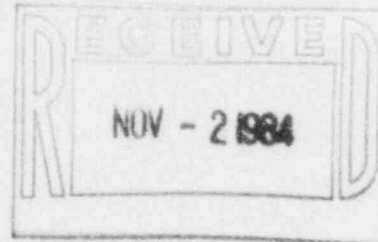
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October 30, 1984

W3P84-2969  
Q-3-A35.07.112  
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. 112  
"Design Changes Via Memoranda"  
Interim Report

Reference: LP&L letter W3P84-2671 dated September 21, 1984

The referenced letter stated that the final report on SCD-112 was scheduled for submittal by October 26. In accordance with 10CFR50.55(e)(3), enclosed are two copies of the LP&L interim report on SCD-112 with a Justification for Interim Operation. The final report on SCD-112 will be provided upon completion of the review and evaluation of the Mercury N1 instrument installations which is expected to be completed by November 15, 1984.

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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INTERIM REPORT FOR  
SIGNIFICANT CONSTRUCTION DEFICIENCY NO. 112  
"DESIGN CHANGES VIA MEMORANDA"

INTRODUCTION

This report is submitted pursuant to 10CFR50.55(e). It describes the transmittal of design changes without the issuance of an applicable design change document.

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

DESCRIPTION OF PROBLEM

During the Ebasco Quality Assurance Review of J.A. Jones Speed Letters and Engineering Information Requests (EIRs), 271 items were identified that transmitted design changes without reference to formal design change documents. This correspondence was between J.A. Jones and Ebasco Construction Engineering. The review of these items found that, for many, no formal design change documents had been issued. The subject of these changes consisted typically of relocations of embedded items to clear interferences and the addition of rebar splices.

SAFETY IMPLICATIONS

The safety significance of this concern is that design changes adversely affecting plant safety may have been made informally circumventing the programmatic review and follow-up action to formalize the change. Based on results to date, this has not been found to be the case.

The review for J. A. Jones has not found any changes that affect plant safety. The findings on the other contractors relate to proper documentation. There are no findings which would affect plant safety.

CORRECTIVE ACTION

A review of approximately 2100 J.A. Jones Speed Letters and EIR's was conducted. Of the 2100 documents reviewed, 271 appeared to convey design changes without proper documentation. These 271 have been evaluated and researched on a case-by-case basis. 104 were found to have proper documentation in the form of a FCR, DCN, NCR or specification governing J.A. Jones installations. The remainder have been determined to be acceptable-as-is by way of engineering analysis. As no rework was initiated as a result of this review, there is no impact on plant safety.

To determine if items which modified existing design were noted on informal documents, such as speed letter and EIR's by contractors other than J.A. Jones, a sample program was developed. The sample program consisted of a minimum 10% review of the documents of this nature for each contractor performing safety related work. Any contractor with 50 or less documents received a total review. Based on the type or number of findings, the reviews were expanded as deemed appropriate.

At present, the review and evaluation has been completed for all safety-related contractors with the exception of Mercury. The Mercury review was expanded to full scope and it is expected to be completed by November 15, 1984. Attachment 1 presents a summary of review of safety-related contractors.

Nonconformance reports will be written for a contractor, if required, to document the conditions found during the sampling of that contractor's information requests and track the information and approval of corrective action.

To preclude recurrence of this concern, Ebasco has further instructed those individuals involved in the implementation of ASP-IV-56 (Control of Information Requests Between Ebasco and Site Contractors). Emphasis was given to the appropriate documentation of design changes.

In addition, the Station Modification process, now in effect at Waterford (Plant Operating Manual Procedure PE-2-006), defines the method for accomplishing hardware modifications and the updating of documentation to reflect as-built conditions from initiation through closure. Use of a Detailed Construction Package Change (DCPC) document is also discussed in the procedure. A DCPC is a formal request for change when work associated with a station modification cannot be accomplished in accordance with the detail construction package instructions which requires the responsible engineer's approval prior to implementation. Subsequent to implementation, the DCPC will be incorporated as a revision to the Station Modification Package.

#### JUSTIFICATION FOR INTERIM OPERATION

As shown in Attachment 1, the review of speed letters and EIRs for J. A. Jones and other safety-related contractors at Waterford 3 did not identify any changes that would affect plant safety.

Mercury's review was expanded to 100% because of the overall concerns related to the Mercury QA Program. However, in view of the numerous physical inspections that have taken place, including a 100% physical reinspection of Mercury N1 instrument installations and the existing sample data, LP&L has a very high confidence that no safety significant findings will be identified.

On this basis SCD-112 is not considered a constraint to fuel load or power operation.

ATTACHMENT 1

SUMMARY OF REVIEW OF SAFETY RELATED CONTRACTORS

<u>SAFETY RELATED CONTRACTORS</u>	<u>APPROXIMATE TOTAL QUANTITY OF DOCUMENTS</u>	<u>SAMPLE SIZE</u>	<u>ITEMS (1) IDENTIFIED</u>	<u>SAFETY SIGNIFICANCE</u>
Tompkins-Beckwith	6600	661	0	0
Fischbach & Moore	6400	1271	3	0
Mercury	3050	305	16 (5.2%)	0
Nisco	559	56	0	0
Gulf Engineering	603	61	0	0
American Bridge	775	775	69 (8.9%)	0
Nooter	N/A	N/A	N/A	0
Combustion Engineering	N/A	N/A	N/A	0
GEO	46	46	0	0
B&B	541	N/A	N/A	0
Waldinger	1178	117	0	0
Fegles	42	42	8 (19%)	0
CBI	N/A	N/A	N/A	0
Sline	118	12	0	0
<u>Ebasco Construction</u>				
(1) Mechanical	105	105	37 (35%)	0
(2) Electrical	1500	155	0	0
(3) Instrumentation	540	54	0	0
(4) Pipe Supports	1700	174	10 (5.7%)	0
(5) Civil	42	42		0
TOTAL	23,777	6,621		0

(1) "Items Identified" is defined as the number of individual information requests which violated the design control program.

W3P84-2969

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Ebasco - M. Yates, A.M. Cutrona, S. Horton, M. Harris

NRC - G.L. Constable, T.A. Flippo