



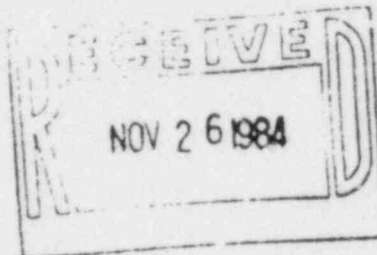
LOUISIANA
POWER & LIGHT

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November 21, 1984

W3P84-3236
3-A20.27
3-A1.0'.04
A4.05

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



Dear Mr. Collins:

Subject: Waterford 3 SES
Docket No. 50-382
NRC Inspection Report 84-39

The attachment to this letter provides the Louisiana Power & Light Company response to the three violations identified in the subject NRC Inspection Report. Each violation (i.e., 8439-01, 8439-02 and 8439-03) is separately addressed.

This response is submitted under affidavit as required by Section 182 of the Atomic Energy Act of 1954, as amended.

If you have any questions on the above responses, please contact G.E. Wuller, Onsite Licensing, at (504) 464-3499.

Yours very truly,

K.W. Cook
Nuclear Support & Licensing Manager

KWC:GEW:sms

Attachment

cc: NRC, Director, Office of I&E
NRC, Director, Office of Management
G.W. Knighton
D.M. Crutchfield
E.L. Blake
W.M. Stevenson
INPO (D.L. Gillispie)

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ATTACHMENT

LP&L RESPONSES TO VIOLATIONS 8439-01, 8439-02 AND 8439-03A. VIOLATION NO. 8439-01Failure to Follow Procedures

Criterion V of 10 CFR 50, Appendix B, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings and shall be accomplished in accordance with these instructions, procedures, or drawings.

Louisiana Power & Light Company (LP&L) Administrative Procedure UNT-5-002, "Condition Identification and Work Authorization," (CIWA) paragraph 5.2.8.2, requires that, upon closure of the CIWA, the planning and scheduling work center notify the shift supervisor/control room supervisor to remove their copy of the CIWA from their files. The planning and scheduling work center then forwards their completed copy to plant engineering for review.

Contrary to the above, on August 28, 1984, the NRC inspectors informed the shift supervisor that CIWA 008402 which was still in his files, had been closed out on August 1, 1984. This CIWA had been sent to plant engineering on August 6, 1984.

This is a Severity Level V Violation. (Supplement II.E) (8439-01)

Response to ViolationCorrective Steps Taken and Results Achieved

1. CIWA 008402 has been removed from the Control Room CIWA files.
2. The Control Room CIWA files have been reviewed. No other CIWAs were identified as requiring removal, therefore, this is considered an isolated occurrence.
3. Personnel involved in maintaining the Control Room CIWA files have been reinstructed on UNT-5-002.

Corrective Steps Which Will Be Taken

No further corrective action is necessary.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

B. VIOLATION NO. 8439-02Failure to Ensure Operability of Safeguards System

Criterion V of 10 CFR 50, Appendix B, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings and shall be accomplished in accordance with these instructions, procedures, or drawings.

LP&L Plant Operating Manual Procedure OP-9-008, Revision 3, "Safety Injection System," paragraph 4.2, requires that sufficient oil is available for the applicable HPSI pump bearings prior to each nonemergency start.

Contrary to the above, on August 17, 1984, the NRC inspector observed that HPSI Pump B was being operated without oil indication for the inboard pump bearing. The required surveillance of the pump was not performed prior to operating the pump.

This is a Severity Level IV Violation. (Supplement II.D) (8439-02)

Response to ViolationCorrective Steps Taken and Results Achieved

1. The HPSI Pump B bearing oil bubbler was removed and it was verified by visual observation that the bearing housing contained oil.
2. OP-903-030 "Safety Injection Pump Operability Verification" was performed satisfactorily on HPSI Pump B.
3. The individuals involved have been counselled concerning the severity of this error and the requirements for procedural compliance at all times.
4. Standing Orders were issued in the Daily Instructions requiring the Shift Supervisor or Control Room Supervisor to ensure (visual observation) that prerequisites are met prior to start of major equipment.

Corrective Steps Which Will Be Taken

No further corrective action is necessary.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

C. VIOLATION NO. 8439-03

Failure to Take Adequate Corrective Action to Preclude Repetition

Criterion XVI of 10 CFR 50, Appendix E, requires that measures be established to assure that conditions adverse to quality such as failure, malfunction, deficiencies, deviations, defective material and equipment, and non-conformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

LP&L Administrative Procedure UNT-5-002, "Condition Identification and Work Authorization," paragraph 5.1.1, requires that abnormal conditions observed in the course of inspections, testing, maintenance, and operation should be identified and corrected using a CIWA.

Contrary to the above, on August 18, 1984, the NRC inspector noted that a CIWA had not been written to correct the abnormal condition that resulted in the oil loss from the inboard bearing oil bubbler on HPSI Pump B. This condition was not addressed on a CIWA until after the NRC inspector discussed this matter with the licensee on August 28, 1984.

This is a Severity Level IV Violation. (Supplement II.D) (8439-03)

Response to Violation

Corrective Steps Taken and Results Achieved

UNT-6-010 "Event Notification and Reporting" is currently being revised to include requirements for identifying the root cause and generic implications of Potentially Reportable Events. Additionally, the PRE form is being revised to identify and track applicable corrective action documents (i.e., CIWA's, Station Modifications, etc.).

Corrective Steps Which Will Be Taken

Revise UNT-6-010 as outlined above.

Date When Full Compliance Will Be Achieved

UNT-6-010 will be revised and issued by 12/10/84.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the matter of

Louisiana Power & Light Company
Waterford 3 Steam Electric Station

)
)
) Docket No. 50-382
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AFFIDAVIT

K.W. Cook, being duly sworn, hereby deposes and says that he is Nuclear Support & Licensing Manager of Louisiana Power & Light Company; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached response to the Notices of Violation/Deviation identified in NRC Inspection Report 84-39; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.

K.W. Cook
K.W. Cook
Nuclear Support & Licensing Manager

STATE OF LOUISIANA)
) ss
PARISH OF ORLEANS)

Subscribed and sworn to before me, a Notary Public in and for the Parish and State above named this _____ day of _____, 1984.

Notary Public

My Commission expires _____.