



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION III  
799 ROOSEVELT ROAD  
GLEN ELLYN, ILLINOIS 60131

September 27, 1984

MEMORANDUM FOR: D. Crutchfield, Director, Waterford Task Force  
FROM: J. J. Harrison, Waterford Task Force QA Team Leader  
SUBJECT: WATERFORD TASK FORCE FOLLOWUP

On September 10 through 13, 1984, the QA Team visited the Waterford site to follow up on some of the issues identified in the D. Eisenhut letter to J. M. Cain dated June 13, 1984. Eight team members and myself reviewed the LP&L responses and actions taken to date on Issues 1, 2, 3, 4, 6, 10, 13, and 20. The attached trip report details my team's visit.

Should you have any questions or comments, please feel free to contact me (FTS 388-5635).

J. J. Harrison  
QA Team Leader

Attachment: As stated

cc w/att:

✓ C. Eisenhut, NRR  
L. Constable, SRI-Waterford

FOIA-85-123

B/10

NRC TRIP REPORT

Docket: 50-382

Construction Permit: CPPR-103

Licensee: Louisiana Power & Light Company (LP&L)  
142 Delaronde Street  
New Orleans, LA 70174

Facility Name: Waterford Steam Electric Station, Unit 3

Location: Taft, LA

Dates of Visit: September 10 through 13, 1984

Persons Making Visit: J. J. Harrison, Waterford Task Force QA Team Leader  
E. Fox, Team Member  
J. Whittemore, Team Member  
T. Morgan, Team Member  
B. Farrell, Team Member  
D. Ross, Team Member  
W. Bare, Team Member  
B. Marini, Team Member  
M. King, Team Member

Principal Persons Contacted:

LP&L

Mr. J. M. Cain, President and Chief Executive Officer  
Mr. T. Gerrets, Corporate Quality Assurance Manager  
Mr. D. Dobson, Project Manager  
Mr. C. J. Savona, Quality Assurance Representative

NRC

Mr. W. Crossman, Chief, Reactor Projects Section B  
Mr. L. Constable, Senior Resident Inspector  
Mr. T. Flippo, Resident Inspector

Other licensee and contractor personnel were also contacted during this trip.

PURPOSE:

The purpose of this visit was to review the program being utilized by LP&L to resolve the NRC issues stated in the D. G. Eisenhut letter to J. M. Cain dated June 13, 1984; Issues 1, 2, 3, 4, 6, and 13 were reviewed during this visit.

SUMMARY:

The NRC activities during this visit included reviewing procedures, personnel training, preliminary review of inspector qualification results, reviewing the LP&L responses to some of the 23 issues in the Eisenhut letter and actions and results of actions taken by LP&L. The findings and results are as follows (denoted by issue number):

RESULTS:

1. 1, 10, and 20 - QA/QC Personnel Qualifications

The staff reviewed the LP&L and EBASCO procedures being utilized to resolve this issue and presented the following comments to LP&L:

- a. LP&L Procedure QASP 19.12 - Section 5.2.1 was commented on by the NRC on August 9 and 10, 1984; however, changes still do not commit to a 100% review of all QA/QC personnel certification packages by LP&L. The LP&L QA manager did not feel this was necessary because of the use of a checklist that eliminated the subjective criteria of ANSI N45.2.6 - 1973. Because of the lack of NRC confidence in EBASCO, Mr. Gerrets was told that a 100% review by LP&L was required. Subsequently, Mr. Gerrets concurred.
- b. EBASCO Procedure QAI 32 - The NRC comments previously provided to LP&L on August 9 and 10, 1984, have not been resolved in that the reviews are indicated as still being accomplished in accordance with "contractors contractual commitments and quality assurance program commitments," not ANSI N45.2.6 - 1973. Also, the new checklist to define the subjective criteria is not referenced in the procedure although it is currently being used. Several other comments were provided to LP&L that also need resolution.
- c. Checklist for Inspector Qualification Review - This checklist was developed by LP&L to provide consistent requirements for establishing qualification requirement basis to evaluate all personnel for NRC Issues 1, 10, and 20. The checklist is being utilized by LP&L and EBASCO. The NRC staff had some concerns in this checklist that were relayed to LP&L. These concerns are:
  - (1) The minimum credits required for Levels I, II, and III are all "0", ANSI N45.2.6 established minimums as high school or equivalent.

- (2) The current credits allowed for experience has the possibility of being reduced by as much as 50%. A major concern here is for example, a Level III could be qualified with less than 5 years experience and a high school education. This basic difference does meet N45.2.6 - 1973 or 1978. The staff agrees that ANSI is not absolute and other factors can be used. LP&L was, however, cautioned that an abuse of this criteria will not be acceptable.

Mr. Gerrets agreed to consider and resolve the NRC comments.

The staff also reviewed the training of the LP&L QA/QC qualification review team, sampled some QA/QC qualification packages, and reviewed the overall QC qualification status. These activities, as reviewed, were found to be adequate, except as noted above:

2. Missing N1 Instrument Line Documentation

The NRC staff reviewed the licensee's response to this issue and found the response to be adequate. LP&L originally committed to remove and replace the 12 I&C lines that were in question. Subsequent to their response, 5 additional lines have been added to the rework commitment, making the current total 17. All work is to be performed and hydrostatically tested in accordance with ASME Section III. The rework had not started as of September 14, 1984. The QA team needs the assistance of an NRR I&C specialist to review the 24 instruments that were downgraded to N-2 (nonsafety-related). This review should take place at the site to allow all available information (engineering basis) to be used to reach a proper conclusion.

3. Instrumentation Expansion Loop Separation

The NRC staff reviewed the licensee's response to this issue and found the response adequate. The original problem identified two expansion loops that violated the separation criteria. These lines have been replaced. LP&L does not plan to hydrostatic test the new installation per ASME Section XI, paragraph IWA-4400 (5). The QA team needs to know whether the lack of this test is acceptable to NRR. The staff reviewed the LP&L walkdown procedure and found the methodology and rationale used for sampling to be adequate. An NRC walkdown is needed to verify that "accept-as-is" decision on separation criteria violations are appropriate. The qualification of one inspector was reviewed to ANSI N45.2.6 - 1973, and he was found to be adequately qualified.

4. Lower Tier Corrective Actions Are Not Being Upgraded to NCRs

The NRC staff review revealed that LP&L failed in their draft response/evaluation to address (1) root cause; (2) generic implications; and (3) actions to prevent recurrence. Each NRC example is being treated as an isolated case. The review process is not looking at the "big picture." The same engineering organization (EBASCO) who failed initially to generate the NCRs are currently performing the evaluations (in some cases the same individual), resulting in basically no problems being identified. The licensee has performed a sampling plan type of review in lieu of 100%, the

staff needs to have a statistician review and approve their plan. LP&L actions on specific NRC examples of problems did not resolve the problems; i.e. correct equipment installed or a \$0.55(e) was not reported even though the review indicated one was warranted.

The staff did not review the T-B DNs during this visit.

5. Vendor Documentation - Conditional Releases

The staff did not review this issue during this visit.

6. Dispositioning of Nonconformances and Discrepancy Reports

The staff reviewed the draft LP&L response to this issue and found the response and actions taken inadequate. A review of the actions on the EBASCO NCRs revealed that the initial review of more or less 7600 NCRs was superficial (not in depth as to proper closure, supporting evidence, reinspection documented, etc.). Based on this review, however, they rejected 494 NCRs. Of that number, only 25% (124) received an in depth review. Of the 124 NCRs, 20% were identified to have problems. This high percentage of problems is not achieving the confidence level that the NRC needs to resolve this issue. LP&L did not utilize a scientific approach to sample the NCRs (e.g. 95% confidence - generally accepted by the staff). LP&L is not addressing the "big picture" problem in this area, same as issue 4.

The action on Mercury NCRs has been generally discounted by LP&L/EBASCO because a large number of those NCRs were upgraded to EBASCO NCRs. This does not meet the intent of the NRC June 13, 1984, letter. This is compounded by the fact of lack of an indepth review of the EBASCO NCRs and is unsatisfactory to the staff. Again, no confidence has been gained in this area by the staff.

The DR review results appear to have the same problems as the EBASCO NCRs, Mercury NCRs and the lower tier corrective action documents. One case was noted that the person performing the reviews was the same person that originally created the problem. The sampling process being utilized has not been documented or scientifically established.

13. Missing NCRs

The NRC review of the LP&L response and actions taken on the EBASCO NCRs found them to be generally adequate. Two of the missing NCRs are questionable as to how LP&L concluded the basis of resolution. All others were deemed properly resolved. This issue is therefore ninety percent complete.

The staff did not review the Mercury NCRs in this area.

22. Welder Qualifications (Mercury) and Filler Metal Material Control (Site Wide)

This issue was not reviewed during this site visit.

23. QA Program Breakdown Between EBASCO and Mercury

This issue was not reviewed during this site visit.

OTHER:

1. As a result of followup on an allegation identified prior to the NRC task force report pertaining to F&M electrical work, LP&L had identified a problem on a site surveillance report. Four items requiring LP&L action were identified. Actions on Items 1, 2, and 4 were reviewed and found to be adequate. Item 3 is still unresolved.

CONCLUSION:

Issue No. 1 - LP&L must understand that they must perform a 100% review in order for the NRC to have confidence in the final product. NRC comments on the procedures and checklist must be resolved. Issues 4 and 6 - it appears that the reviews being accomplished by LP&L and EBASCO are not developing the product that the NRC expects to provide us with the confidence we need. The reviews are superficial, at best, and the staff examples and LP&L findings are being treated as isolated cases. The "big picture" is not being addressed; that is, root cause determination, generic implication, and action to prevent recurrence is not evident. The staff met with various members of LP&L and EBASCO and relayed our concerns during this visit. Since LP&L has decided to perform their evaluations statistically in lieu of 100 per cent, the NRC needs to review what LP&L intends to accomplish and approve that plan. Issues 2, 3, and 13 appear to be on course with the LP&L responses and actions taken being generally adequate.

Prior to the next NRC QA team site visit, the evaluation of the NUS site project plan and personnel qualifications will be completed and documented.

MEETING:

On September 13, 1984, I met with Mr. Cain, President and CEO of LP&L, to discuss the programmatic aspect regarding LP&L's actions, taken on the task force findings.

NRC Pre-Licensing Issues

NRC  
REPRESENTATIVE

LP&L  
CONTACTS

TITLE

QA/QC Personnel  
 Class Break  
 Expansion Loop  
 Upgrading of Low Tier  
 Conditional Releases  
 Dispositioning of NCR's  
 Backfill soil Densities  
 Shop Weld Hydro's  
 Welder Certification  
 Inspector Qual. JAJ & Fegles  
 Cadwelding  
 Main Steamline Restraints  
 Missing NCR's  
 JAJ Speed Letters and NCR's  
 RCB's "D" Level Welding  
 Exit Interviews  
 QC of expansion anchors  
 Two-over-one walkdowns  
 Water in basemat conduit  
 GEO Testing Personnel  
 System Transfer  
 Welding qualifications  
 Ebasco/Mercury/LP&L  
 Collective significance

J. Harrison  
 J. Harrison  
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 Larry Shao  
 Larry Shao  
 Larry Shao  
 Larry Shao  
 Larry Shao  
 Larry Shao  
 J. Harrison  
 Larry Shao  
 Larry Shao  
 Dennis Crutchfield  
 Dale Thatcher  
 Dale Thatcher  
 Larry Shao  
 Mark Peranich  
 Mark Peranich  
 J. Harrison  
 J. Harrison  
 Dennis Crutchfield

Ted Heatherly  
 Jim Agles  
 Jim Agles  
 Ted Heatherly  
 Bill Hubacek  
 Jim Agles  
 Bill Hubacek  
 Jim Agles  
 Joe Waters  
 Ted Heatherly  
 Bill Hubacek  
 Ted Heatherly  
 Jim Agles  
 Bill Hubacek  
 Bill Hubacek  
 Scott Schum  
 Joe Waters  
 Ted Heatherly  
 Bill Hubacek  
 Ted Heatherly  
 Ted Heatherly  
 Jim Agles  
 Jim Agles  
 C.J. Savona  
 Gary Pittman  
 Gary Pittman  
 C.J. Savona  
 Lon Bass  
 C.J. Savona  
 Dave Grubic  
 Rich Hartnett  
 Max Green  
 C.J. Savona  
 Rich Hartnett  
 Roger Sandridge  
 C.J. Savona  
 Roger Sandridge  
 Max Green  
 Mike Leddick  
 Gary Pittman  
 Ray Burski  
 Ray Burski  
 C.J. Savona  
 Lon Bass  
 Gary Pittman  
 Mike Meisner  
 Ken Cook

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GEND:

m Agles = 3656  
 n Bass = 321  
 y Burski = 3481  
 n Cook = 3436  
 m Gerrets = 3466  
 x Green = 388  
 ve Grubic = 784  
 ch Hartnett = 325  
 d Heatherly = 3684  
 ll Hubacek = 243  
 ke Leddick = 3370  
 ke Meisner = 291  
 ty Pittman = 323  
 ger Sandridge = 326  
 J. Savona = 429  
 ott Schum = 217

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