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QA

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

Subject: Waterford 3 SES  
Docket No. 50-382  
License No. NPF-38  
NRC Inspection Report 88-08

Louisiana Power & Light hereby submits, in Attachment 1, the response to Appendix A of the subject Notice of Violation (concerning inadequate maintenance work instructions) in accordance with 10 CFR Part 2.201.

In addition, in Attachment 2 is Louisiana Power & Light's response to Appendix C of the subject Notice of Violation (concerning inadequate operating procedures) in accordance with 10 CFR Part 2.201.

If there are any questions concerning these responses, please contact L.W. Laughlin, Site Licensing Support, at (504) 464-3499.

Very truly yours,

R.F. Burski  
Manager -  
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RFB:SEF:ssf

Attachments

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ATTACHMENT 1

LP&L Response to NRC Inspection 8808-03  
Notice of Violation  
Appendix A

VIOLATION

Technical Specification 6.8.1.a requires written procedures to be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33 requires procedures appropriate to the circumstances for performing maintenance on safety-related equipment.

Contrary to the above, on April 18, 1988, the maintenance procedure/work instruction authorizing disassembly of Main Steam Isolation Valve MS-124B was not appropriate to the circumstances in that maintenance personnel were applying hydraulic jacks to unseat the valve and the work instruction did not address this activity.

This is a Severity Level IV violation.

RESPONSE

LP&L acknowledges that this incident was a violation of the guidelines of Regulatory Guide 1.33 in that disassembly work instructions for Main Steam Isolation Valve MS-124B were not detailed enough relative to the circumstances.

(1) Reason For The Violation

On April 9, 1988, the plant was shut down and cooled down in operational Mode 5 for the second refueling outage. When the Number 1 Main Turbine Throttle Valve was opened for routine inspection, a piece of a gate guide assembly for one of the two MSIVs was found.

During the subsequent investigation to inspect the suspect MSIV, mechanics were attempting to unseat the valve. This was the first time this type valve was disassembled on-site. The original attempts proved unsuccessful, and alternatives were developed at the job site in a manner outside the scope of the work package. This valve is a split disc design which wedges tightly in the closed position when closed normally, as had been done for this outage. In order to disassemble the valve it must be allowed to drift closed so as not to wedge tightly, because the actuator can apply much greater force than a crane or jacks. This step was not initially incorporated in the work instructions since the instructions for actuator disassembly were written before it was known that the valve itself would require disassembly. The manufacturer's representative was providing verbal

instructions to the mechanics. Without the required review and approval, the mechanics started using hand operated, portable hydraulic jacks in combination with a crane. The lifting devices were connected to the valve gate in a way to simulate the action of the valve operator. The valve manufacturer's representative, a management representative, as well as Quality personnel were present during this evolution. It was not clear to the crew at the job that the methods being employed were beyond the scope of the work instruction. After the NRC contacted the senior manager on-shift, work on MSIV B was stopped.

The valve vendor's instruction manual required the valve to be shut (not necessarily wedged tightly) for disassembly. When the valve was closed at the beginning of the outage, the valve was shut normally (a fast three second closure). The use of hydraulic jacks to unseat the valve was not considered unusual or harmful to the MSIV by the vendor representative. The impact of the broken guide rails on the disassembly effort was not known when the job started. The vendor technical manual was at the job location throughout this event.

Mechanical Maintenance procedures provide guidance concerning reworking of valves, torquing, etc. In addition, the planners utilize controlled vendor manuals in the preparation of work instructions.

(2) Corrective Actions That Have Been Taken

When it was determined that the activity exceeded the approved work instructions, work was suspended.

Subsequently, the revised work instruction was properly engineered, revised, reviewed, approved, and implemented. The supervisory chain was counseled by senior management to ensure there would not be any unauthorized deviations from approved work instructions. In addition, Quality Control personnel were briefed and their coverage was intensified for the remainder of the MSIV work.

The immediate corrective action for exceeding the scope of the original work instruction for MSIV B was that the requirement for following instructions for work on plant equipment was emphasized to Mechanical Maintenance personnel. Also, they were reminded to report deficiencies in this area to their supervisors and/or via the Corrective Action system (NOP-005).

(3) Corrective Actions To Be Taken

This response will be presented to personnel in each of the three Maintenance Department disciplines. Emphasis will be placed on the necessity for procedure compliance and the requirements for obtaining review and approval of work instruction changes that amount to a change in scope or intent. The Plant Manager will discuss this incident specifically and the station's policy on procedure and work

instruction compliance with Operations, Maintenance, Health Physics, and Chemistry personnel to ensure the generic implications are clearly understood. It is anticipated that these presentations will be completed by July 31, 1988.

(4) Date When Full Compliance Will Be Achieved

Waterford 3 is presently in full compliance.

ATTACHMENT 2

LP&L Response to NKC Inspection 8808-07  
Notice of Violation  
Appendix A

VIOLATION

Technical Specification 6.8.1.a requires written procedures to be established, implemented, and maintained for atmosphere cleanup systems as recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Contrary to the above, on April 29, 1988, the licensee failed to establish an adequate procedure to control the operation of the fuel handling ventilation system, in that the procedure valve lineup failed to identify 14 instrument root valves and specified the incorrect position for several dampers.

This is a Severity Level IV violation.

RESPONSE

(1) Reason For The Violation

Example (a)

Emergency Filtration Unit "B" Makeup Air Damper HVF-201B is included in the standby system lineup with no position given.

Explanation (a)

HVF-201B standby lineup position, performed signoff and verified signoff were inadvertently excluded from Attachment 8.1 during revision 4. Revision 5 of OP-2-009 corrected the oversight. The damper was actually closed as required.

Example (b)

The standby system lineup requires Dampers HVF-103, HVF-109, and HVF-110 to be open. Damper HVF-104 is required to be closed. The lineup should require Dampers HVF-109 and HVF-110 to be shut and only Damper HVF-103 to be open. Additionally, the control switch for Dampers HVF-103 and HVF-109 requires one of these dampers to be open while the other is shut.

Explanation (b)

The above example is not completely correct, in that OP-2-009, Revision 4, Fuel Handling Building HVAC, Standby System Valve and Damper Lineup, Attachment 8.1, required HVF-103 to be closed and HVF-104, HVF-109, and HVF-110 to be open. HVF-103 and HVF-110 are operated by a common switch powered by the "A" electrical bus. HVF-104 and HVF-109 are operated by a common switch powered by the "B" electrical bus. HVF-103 (HVF-104) is open for normal ventilation (intake) and closed for high radiation conditions (bypass). HVF-110 (HVF-109) is closed for normal ventilation (intake) and open for high radiation conditions (bypass). Revision 4 was in error in that HVF-104 should have been positioned open rather than closed. Since aligning the dampers as stated would have been impossible due to the control switch interlock, this discrepancy would have been noticed if the standby lineup had been performed. OP-2-009, Revision 5, Fuel Handling Building HVAC, Standby System Valve and Damper Lineup was changed to lineup the system for normal ventilation by requiring HVF-103 and HVF-104 open and HVF-110 and HVF-109 closed.

Although the standby lineup was in error, the operation of the emergency filtration units were not affected. Revision 4 properly aligned these 4 dampers prior to startup of the emergency filtration units per section 6.3, Manual Isolation of FHB Non-Rad Areas and Startup of Emergency Filtration Unit. In the event of a fuel handling accident (detected by fuel handling building radiation monitors), the valves are placed in the proper position by interrupting power in their control circuits.

Example (c)

The following instrument root valves are not included in the system lineup or controlled by the fuel handling building ventilation system operating procedure:

Air Handling Unit E-35 (3A-SA)

HVF-211	A	HP	side	DPT HV	5108	AS*
HVF-212	A	LP	side	DPT HV	5108	AS
HVF-214	A	HP	side	DPS HV	5112	A
HVF-214	A	LP	side	DPS HV	5108	A
HVF-215	A	HP	side	DPS HV	5108	A
HVF-216	A	LP	side	DPS HV	5109	A
HVF-217	A	HP	side	DPS HV	5109	A
HVF-218	A	HP	side	DPS HV	5110	A
HVF-219	A	LP	side	DPS HV	5112	A
HVF-219	A	LP	side	DPS HV	5110	A



Air Handling Unit E-35 (3B-SB)

HVF-211	B	HP	side	DPT HV	5108	BS*
HVF-212	B	LP	side	DPT HV	5108	BS
HVF-214	B	HP	side	DPS HV	5112	B
HVF-214	B	LP	side	DPS HV	5108	B
HVF-215	B	HP	side	DPS HV	5108	B
HVF-216	B	LP	side	DPS HV	5109	B
HVF-217	B	HP	side	DPS HV	5109	B
HVF-218	B	HP	side	DPS HV	5110	B
HVF-219	B	LP	side	DPS HV	5112	B
HVF-219	B	LP	side	DPS HV	5110	B

\* not on NRC Inspector's list and not in OP-2-009, Revision 4

Explanation (c)

These root valves do not appear on the system flow diagram G-853, Sheet 2. They are illustrated, but not labeled on B431, Sheets 274 and 275. They are illustrated, but not labeled on B425 instrument loop drawings. The taps are shown on drawing 1564-4310, but not the tubing or root valves. The valves service the instrumentation listed above, and those instruments are verified in-service via OP-2-009, Revision 4, Attachment 8.3. Since it was the standard practice of the Waterford 3 Architect Engineer not to show HVAC instrumentation root valves in process drawings, the valves do not appear on drawings and were therefore not included on valve lineup procedures written using those drawings. The in-service check only involves valves at the instrument rack. Plant Monitoring Computer indication and other control indications make it readily apparent to the plant operator, after the fans are started, that the root valve is not open.

(2) Corrective Actions That Have Been Taken

The problems identified with OP-2-009, Revision 4, by the NRC Inspectors are resolved in Revision 5, approved by PORC on June 23, 1988. Revision 5 also addresses the missing HVF-211A(B) root valve.

(3) Corrective Actions To Be Taken

Walkdowns are being conducted on Engineered Safety Features (ESF) ventilation units to verify that the appropriate instrumentation has been identified and that root valves are properly numbered and labeled. Operating Procedures for ESF ventilation units are being reviewed to verify that the root valves for the instruments referenced are included in the standby lineup.

The ventilation system root valve problem identified above will receive an engineering evaluation to determine the appropriate design documentation for these valves.

A one-time surveillance of a representative sample of non-ventilation ESF systems will be performed to verify that root valves were only omitted from ventilation system drawings.

(4) Date When Full Compliance Will Be Achieved

The review of ESF ventilating system operating procedures described above will be completed by September 5, 1988.

The evaluation of ventilation system root valve documentation is scheduled for completion by August 1, 1988, and will include a schedule for corrective action as necessary.

The review of non-ventilation ESF system drawings for root valve discrepancies is scheduled for completion by August 1, 1988.