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MIDDLE SOUTH UTILITIES SYSTEM

July 18, 1988

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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
Inspection Report 88-17

Attached is the Louisiana Power and Light Company (LP&L) response to Violation No. 8817-01 identified in Inspection Report No. 88-17.

If you have any questions on the response, please contact L.W. Laughlin, Site Licensing Support, at (504) 464-3499.

Very truly yours,

R.F. Burski

R.F. Burski
Manager
Nuclear Safety & Regulatory Affairs

RFB:BGM:ssf

Attachment

cc: R.D. Martin, NRC Region IV
J.A. Calvo, NRC-NRR
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LP&L Response to Violation No. 8817-01

VIOLATION NO. 8817-01

Failure to Follow Technical Specification (TS) Requirement for Procedure Change

Paragraph 6.8.2 of the TS specifies that each procedure required by TS 6.8.1, and changes thereto, shall be reviewed as specified in TS 6.5.1.6 and shall be approved by the Plant Manager-Nuclear prior to implementation and reviewed periodically as set forth in administrative procedures.

Contrary to the above, during performance of the Isothermal Temperature Coefficient Measurement Procedure, NE-2-060, with control rod reference group "B" inserted, the procedure required by TS 6.8.1, was changed without approval from the Plant Manager-Nuclear. Specifically, instruction 6.2 specifies that the RCS temperature be decreased 5° to 10° at a rate less than 50°F/hour, but cooldowns were successively conducted at 3.9°, 2.8°, and 2.0°F.

This is a Severity Level IV violation.

RESPONSE

(1) Reason For The Violation

On May 30, 1988, test procedure NE-02-060, Isothermal Temperature Coefficient, was being conducted with reactor power at approximately 1x10^{-3}% full power. The procedure called for the steam demand to be increased which resulted in the Reactor Coolant System (RCS) temperature decreasing. As the RCS temperature decreased, the reactor power increased (as was expected) and a licensed reactor operator suggested that the temperature decrease be stopped to prevent power from exceeding the range of the special reactivity computer. At this time the Test Engineer determined that enough data had been collected to calculate the Isothermal Temperature Coefficient (ITC) and agreed to stop the temperature decrease. Step 6.3 in the procedure says to "...allow sufficient data to be accumulated to determine ITC,...", this step was accomplished, however, there had not been a 5° to 10°F change in temperature as called for in step 6.2. This would have been acceptable if a procedure deviation had been written. However, no procedure deviation was written because of personnel error due to the Test Engineer believing that satisfying step 6.3 was sufficient to complete the necessary calculations.

In the above stated violation, LP&L was cited for violating TS 6.8.1 because a procedure change was made without approval from the Plant Manager-Nuclear. However, a procedure change was neither made nor intended. As described above, step 6.3 instructed the Test Engineer to collect sufficient data to calculate ITC. However, when sufficient data was collected, the test was terminated without accomplishing the

5° to 10°F temperature change specified in step 6.2. The Test Engineer, therefore, did not violate TS 6.8.1, but rather deviated from step 6.2 in NE-2-060 without writing a procedure deviation.

(2) Corrective Actions That Have Been Taken

This incident was discovered while the Startup Testing was still in progress so not only was the Test Engineer counseled concerning this incident, but, in addition, the remaining test personnel were reminded of the importance of following procedures and of changing them if needed.

(3) Corrective Actions To Be Taken

The test procedure, NE-02-060, will be revised to clarify any inconsistencies between steps 6.2 and 6.3. During the month of July, 1988, the Plant Manager will be counseling plant staff personnel on the importance of adhering to procedures.

(4) Date When Full Compliance Will Be Achieved

The test procedure, NE-02-060 will be revised prior to its next use (the third refueling outage).