APPENDIX B

U.S. NUCLEAR REGULATORY COMMISSION REGION IV

NRC Inspection Report: 50-382/88-07

Operating license: NPF-38

Docket: 50-382

Licensee: Louisiana Power & Light Company (LP&L)

317 Baronne Street P.O. Box 60340

New Orleans, Louisiana 70160

Facility Name: Waterford 3 Steam Electric Station (SES)

Inspection At: Waterford 3 SES site near Killona, Louisiana

Inspection Conducted: March 21-25, 1988

Emergency Preparedness

Specialist

Approved:

William L. Fisher, Chief, Nuclear Materials and Emergency Preparedness Branch

Inspection Summary

Inspection Conducted March 21-25, 1988 (Report 50-382/88-07)

Areas Inspected: Routine, announced inspection of: emergency facilities, equipment, instrumentation, supplies, organization and management control, and independent reviews/audits.

Results: Within the areas inspected, one violation and no deviations were identified.

DETAILS.

1. Persons Contacted

Licensee

*R. Barkhurst, Vice President, Nuclear

*F. Englebracht, Emergency Planning Manager

*J. Zabritski, Operations Quality Assurance Manager

*S. Alleman, Quality Assurance Manager *P. Prasankumar, Assistant Plant Manager

*D. Packer, Assistant Plant Manager, Operations and Maintenance

*J. Lewis, Onsite Emergency Planning Coordinator

Other

*T. Staker, NRC Resident Inspector

*Denotes attendance at exit interview.

The NRC inspector also held discussions with other station personnel in the areas of emergency detection and classifications, protective action recommendations, notification and communications, staffing and augmentation, health physics, operations, and emergency response organization.

Emergency Plan and Implementing Procedures 02.01

The NRC inspector reviewed licensee documentation to determine whether major changes to the emergency preparedness program may have affected the overall emergency program adversely.

The NRC inspector reviewed the licensee's changes to the emergency plan and implementing procedures, safety committee review, management approval, and licensee submittal to the NRC as required by 10 CFR 50 Appendix E.V. The licensee stated, in writing, that plan and procedure changes were reviewed to ensure compliance with 10 CFR 50.54(n). The inspector noted that the Plant Operations Review Committee (PORC) had reviewed emergency plan and procedure changes. Additionally, the PORC had conducted the emergency plan review and sent the results of the review to management as required by the Technical Specifications. Licensee emergency response facilities were inspected to determine whether any facility changes had occurred and whether changes had been incorporated into the Plan and Procedures. NRC Region IV did not receive for review any changes that decreased the effectiveness of the Plan. The inspector reviewed changes to plan and procedures and the submittal of changes to the NRC. Licensee records indicated that appropriate changes had been revised and submitted to the NRC in the required 30 days. The inspector determined that the licensee did have a written procedure for submitting procedure changes to

the NRC. A procedure did exist for distributing procedures and maintaining records. During the inspector's review of documents in the back-up Emergency Operations Facility, it was noted that a person's name had been removed and a new name inserted by pen. Emergency Procedure EP-3-050 Revision 4, Section 5.3.1.2.1.b states that all changes shall be made with a black ball point pen, dated, and initialed.

Additionally, the inspector determined that the document had not been updated as required. This was an apparent violation of Technical Specification 6.8. The licensee's management took immediate corrective action by scheduling a training session with the staff to review the procedure requirements. Additionally, other management resource documents were checked for initials, dates, and completeness. This is an apparent violation of Technical Specification 6.8 requirements. (382/8807-01)

One apparent violation and no deviations were identified in this program area.

3. Emergency Facilities, Equipment, Instrumentation, and Supplies 02.02

The NRC inspector reviewed key facilities and equipment to determine whether the facilities were Maintained and whether any facility changes had been incorporated into the emergency plan and implementing procedures. Additionally, facility, equipment, and supply changes were reviewed for adverse effect on the emergency preparedness program. Emergency facilities, equipment, instrumentation, and supplies were reviewed to determine the state of readiness and accessibility. Selected communication and emergency vehicle equipment was tested for operability. The equipment functioned as required. The inspector noted that licensee procedures specified that emergency vehicles were to have the vehicle radio in the "cn" position whenever the vehicle was in use. All vehicles which were observed by the inspector had their radios switched to the "off" position; however, the vehicles were not in use at the time. The inspector selected equipment kits and determined that the kits were as described in the emergency plan. The inspector noted that the back-up facilities did not have any emergency lighting and the back-up Emergency Operations Famility (EOF) did not have a clock in the area. The inspector noted that the Emergency Notification System (ENS) telephone had not been installed in the EOF. Installation of the ENS telephone is an NRC and AT&F interface concern.

The inspector discussed the following observations with the licensee during the exit interview:

The licensee should consider installing emergency lighting in the Corporate Command Center and the back-up EOF. (Licensee notified inspector that lights and a clock were installed in the emergency response facilities the following week).

The licensee should consider leaving vehicle radios in the "on" position if the radio is wired to turn off with the ignition switch to avoid inadvertently forgetting to turn the radio on when the vehicle is in service.

No violations or deviations were identified in this program area.

4. Organization and Management Control 02.03

The NRC inspector reviewed the documents listed below and interviewed licensee representatives to determine if changes had been made to the emergency organization and/or management control systems and, if so, the resulting program effect. Additionally, the inspector determined whether changes had been incorporated into the Plan and Procedures. (10 CFR 50.54(b)(1))

Documents Reviewed:

Emergency Management Resources

Emergency Response Plan - Organization

A change to the emergency response organization resulted from changes to key station management positions. The inspector reviewed the emergency management resource book. Personnel changes did not appear to have decreased the effectiveness of the emergency response organization.

No violations or deviations were identified in this program area.

Independent Reviews/Audits 02.05(I)

The NRC inspector reviewed the documents listed below and interviewed licensee representatives to determine whether annual independent reviews or audits of the emergency preparedness program had been performed in accordance with the requirements of 10 CFR 50.54(t).

Additionally, the inspector determined whether the licensee had a corrective action system for deficiencies and weaknesses identified during drills and exercises and whether corrective actions had been appropriate and timely.

The Quality Assurance Department had performed the 12-month Emergency Preparedness Program review; however, the review had not been finalized for distribution to licensee management. The inspector discussed areas that had been reviewed by licensee auditors and general comments made by the auditor team. The inspector will review the final report during a future inspection.

(I) denotes that inspection was not completed.

No violations or deviations were identified in this program area.

6. Inspector Observations

An inspector observation is a matter discussed with the licensee during the exit interview. Observations are neither violations nor unresolved items. Observations are suggested for the licensee's consideration, but have no specific regulatory requirement. Observations are identified in paragraph 3 of this report.

7. Exit Interview

The NRC inspector met with the NRC resident inspector and licensee representatives denoted in paragraph 1 on March 25, 1988, and summarized the scope and findings of the inspection as presented in this report.