



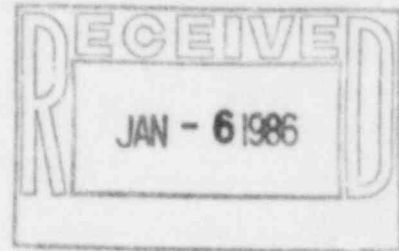
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January 3, 1986

W3P86-0001  
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QA

Mr. Robert D. Martin  
Regional Administrator, Region IV  
U.S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76011



Dear Mr. Martin:

Subject: Waterford 3 SES  
Docket No. 50-382  
License No. NPF-38  
NRC Inspection Report 85-26

Reference: NRC Region IV Inspection Report No. 85-26 transmitted by letter dated December 5, 1985 from J.E. Gagliardo to R.S. Leddick (LP&L).

Attached are the responses of Louisiana Power & Light Company (LP&L) to Violations 8526-01 and 8526-02, and Notice of Deviation 8526-01 which are cited in the referenced inspection report.

If you have any questions on the LP&L responses, please contact G.E. Waller, Onsite Licensing, at (504) 464-3499.

Very truly yours,

K.W. Cook  
Nuclear Support & Licensing Manager

KWC:GEW:sms

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Attachment

cc: NRC, Director, Office of I&E  
G.W. Knighton, NRC-NRR  
J.H. Wilson, NRC-NRR  
NRC Resident Inspectors Office  
B.W. Churchill  
W.M. Stevenson

5C-001/86

LP&L RESPONSES TO VIOLATIONS/DEVIATION IN INSPECTION REPORT NO. 85-26

VIOLATION NO. 8526-01

Failure to Provide Proper Storage

Facility Technical Specifications, Section 6.8, "Procedures Programs," state in paragraph 6.8.1, "Written procedures shall be established, implemented and maintained covering the activities referenced below:" Paragraph 6.8.1.a, states, "The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978 . . ." NRC Regulatory Guide 1.33, Appendix A, paragraph 7.b(3) establishes requirements for having procedures for Drum Handling and Storage involving solid radioactive waste. The following two items were noted:

1. Waterford 3 Radwaste Technical Procedure RW-2-300, "Receipt, Storage and Loading of Shipping Containers," paragraph 6.1.1, states, "All DOT specification, strong tight, and certified shipping containers shall be stored to minimize exposure to inclement weather conditions."

Contrary to the above, the NRC inspectors determined on October 10, 1985, that approximately eight solidification liners/LSA shipping containers used for processing wet radioactive waste had been stored outside the security fence behind the Services Building at least since October 7, 1985, without protection from inclement weather.

2. Waterford 3 Radwaste Technical Procedure RW-2-310, "Storage of Loaded Shipping Containers," paragraph 6.3, states, "All loaded shipping containers shall be stored in weather-tight buildings or enclosures."

Contrary to the above, the NRC inspectors determined on October 10, 1985, that approximately 114 loaded shipping containers were stored outside without protection from ambient conditions.

This is a Severity Level IV violation (Supplement V)(382/8526-01).

RESPONSE TO VIOLATION

(1) Reason for the Violation

Although the procedures were written to provide for indoor or sheltered storage for unloaded or loaded shipping containers, due to space limitations, LP&L stored some containers outside. LP&L feels that the intent of protecting the shipping containers is to prevent the use of degenerated containers prior to filling with radioactive waste, and to prevent degradation of loaded containers while in interim storage.

(2) Corrective Steps Taken and Results Achieved

LP&L Waterford 3 facility procedures have been modified as follows:

1. Procedure RW-2-300 has removed storage requirements for empty containers and has required a documented inspection of all containers prior to loading of radioactive waste. This procedure change was approved on October 30, 1985.
2. Procedure RW-2-310 has been modified to require that "Unshielded, loaded shipping containers shall be either stored in weathertight buildings or monitored at quarterly intervals for package deterioration." This procedure change was approved on October 30, 1985.

(3) Corrective Actions That Will Be Taken

None

(4) Date When Full Compliance Will Be Achieved

All corrective actions identified are complete and full compliance was achieved on October 30, 1985 with approval of procedure changes.

VIOLATION NO. 8526-02

Failure to Conduct Training

NRC Inspection and Enforcement Bulletin 79-19, "Packaging of Low-Level Radioactive Waste for Transport and Burial," requires action to be taken by licensee's to provide training and periodic retraining to those employees who operate the processes. This further is amplified in paragraph 5.1.3 of Waterford 3 Radwaste Technical Procedure, "Packaging Radioactive Solid Waste (DAW) for Disposal," which states, in part, "Training Requirements - Personnel performing radioactive waste handling and packaging shall have completed training in the following:

Instruction in the operation of the B-100 waste compactor and the packaging and handling of radwaste in accordance with this procedure (RW-2-200)."

Contrary to the above, the NRC inspectors determined on October 10, 1985, that a contractor employee had performed solid radioactive waste compaction using the B-100 waste compactor approximately 18 times during the period July 18 through September 5, 1985, but had not received the above training identified in procedure RW-2-200.

This is a Severity Level IV violation (Supplement V)(382/8526-02).

RESPONSE TO VIOLATION

(1) Reason for the Violation

Waterford 3 policy for training of Radwaste personnel is delineated in UNT-3-018. This procedure, entitled "The Radwaste Helper and Radwaste Technician Training Procedure", was approved on May 1, 1984. RW-2-200 had not been updated since the issuance of this procedure.

The Radwaste Supervisor had waived the required training for contract employees, however, the waiver was not in accordance with the Training procedure.

(2) Corrective Steps Taken and Results Achieved

1. Radwaste personnel supervision have been re-instructed in the training requirements/qualification sign-off methodology and the training waiver procedure.
2. Consistent with the Company training policy, Radwaste procedures (including RW-2-200) have been updated to delete references and prerequisites to training requirements. This update was approved on November 7, 1985.

(3) Corrective Actions That Will Be Taken

Radwaste personnel will continue to be trained per approved procedures or a waiver of training will be documented in accordance with approved facility procedures.

(4) Date When Full Compliance Will Be Achieved

Full compliance was achieved with the procedure changes which were approved on November 7, 1985.

NOTICE OF DEVIATION 8526-01

The Final Safety Analysis Report (FSAR) for Waterford 3, Sections 11.4.6, "Storage Facilities," 11.4.7, "Interim Solid Waste Storage," and 11.4.8, "Interim Dry Compacted Waste Facility," identifies three specific areas where low-level radioactive waste (LLRW) will be temporarily stored.

In deviation from the above, the NRC inspectors determined on October 10, 1985, that the licensee had approximately 111 containers of LLRW stored in 4 areas not referenced in the FSAR. (382/8526-01).

RESPONSE TO DEVIATION

(1) Reason for the Deviation

Due to a large volume of very low-level radioactive waste that was produced during the early operational phases of the Waterford 3 startup, it was felt that alternative means of disposal should be made available rather than shipping this waste to a commercial radioactive waste burial site. These alternative methods require additional interim storage areas, which were approved using established Health Physics practices. LP&L failed to initiate FSAR changes to include the additional interim storage areas.

(2) Corrective Steps Taken and Results Achieved

None

(3) Corrective Actions That Will Be Taken

An FSAR change request will be initiated.

(4) Date When Full Compliance Will Be Achieved

FSAR change request is expected by January 31, 1986 to achieve full compliance.