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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 88-19

Gentlemen:

In accordance with 10 CFR Part 2.201, Louisiana Power & Light hereby submits in Attachment 1 the responses to the Violations identified in Appendix A of the subject Inspection Report.

If you have any questions concerning these responses, please contact T.J. Gaudet at (504) 464-3325.

Very truly yours,

R.F. Burski  
Manager  
Nuclear Safety & Regulatory Affairs

RFB:TJG:ssf

Attachment

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ATTACHMENT 1

LP&L Responses to Violations Identified in Appendix A  
of Inspection Report 88-19

A. VIOLATION NO. 8819-01

Failure To Report To NRC

10 CFR 50.73(a)(1) states, in part, that the holder of an operating license for a nuclear power plant shall submit a Licensee Event Report (LER) for any event of the type described in this paragraph within 30 days after the discovery of the event.

Attachment 6.5 of LP&L Administrative Procedure UNT-6-010, Revision 4, "Event Notification and Reporting," requires, in part, an LER as described above to be submitted when there was any operation or condition prohibited by the plant's Technical Specification (TS) or if an event or condition during operation results in the nuclear power plant being in a condition that was outside the design basis of the plant.

Contrary to the above, the staff identified four examples where the licensee failed to comply:

1. Until April 18, 1988, the licensee failed to issue an LER identifying a condition found on April 2, 1987, where nonsafety electrical circuits were not separated from safety circuits using double circuit breakers in accordance with NRC Regulatory Guide 1.75 as committed in the FSAR. This was a condition that was outside the design basis of the plant.
2. Until April 18, 1988, the licensee failed to issue an LER identifying conditions discovered on August 19, 1987, where Gas Decay Tank sampling was not performed as required by TS Table 3.3-13. As a result, the plant was in a condition prohibited by the TS.
3. Until April 18, 1988, the licensee failed to issue an LER identifying conditions discovered on October 21, 1987, where Containment Atmosphere Purge Isolation Valves CAP-103 and CAP-205 had exceeded the stroke time periodicity specified by TS 4.0.2 and 4.0.5. As a result, the plant was in a condition prohibited by the TS.
4. Until July 11, 1988, the licensee failed to issue an LER identifying conditions discovered on May 17, 1988, where Snubber SISR-1352 was found missing from a shutdown cooling line that was required to be operable per TS 3.7.8 and 3.9.8.2 while the plant was being refueled. As a result, the plant was in a condition prohibited by the TS.

This is a Severity Level IV violation.

RESPONSE

LP&L admits this violation in that LERs for each of the above noted events should have been submitted in accordance with 10CFR50.73(a)(1) since conditions that were either outside the design basis of the plant or were prohibited by the TSs existed.

(1) Reason For The Violation

1. Item 1 addresses the nonreporting of a failure to meet safety to nonsafety electrical distribution separation criteria that was identified on April 2, 1987. The basis for not submitting an LER was strictly due to an oversight on the initial reportability determination which was dated April 6, 1987. On March 23, 1988, the reportability determination was subsequently revised and LER 87-029 was issued on April 18, 1988 accordingly.
2. Item 2 cites the failure to submit an LER within 30 days from discovery of a missed Waste Gas Decay Tank sample on August 19, 1987. It was believed, prior to expiration of the 30 day limit, that the 25% surveillance extension of Technical Specification (TS) 4.0.2 applied to TS Limiting Condition for Operation (LCO) time requirements. Consequently, the event was determined to be not reportable. On April 18, 1988, a voluntary report (LER 87-030) was submitted which discussed in detail how plant staff made the reportability determination. It has since been learned that the 25% extension of TS 4.0.2 does not apply to LCO time limits.
3. Item 3 identified the failure to submit an LER within 30 days from discovery of missed stroke test surveillances of two Containment Atmosphere Purge (CAP) valves in accordance with TS 4.0.5. Prior to expiration of the 30 day limit, the event was determined to be not reportable. The basis for this determination was that by declaring valve CAP 205 inoperable, which necessitates classifying leakage through valves CAP 103 and CAP 104 as bypass leakage, leakage would still remain well within the allowable limit. (It is important to note that CAP 103 was tested within TS 3.6.1.7 LCO time limits.)

On April 18, 1988, a voluntary report (LER 87-031) was submitted which discussed in detail how plant staff made the reportability determination. It has since been understood, which was not apparent at the time of the initial reportability determination, that missed TS 4.0.5 surveillances constitute a condition prohibited by TSs.

4. The last Item addresses the issuance of LER 88-017 on July 11, 1988, for the identification of a snubber missing from the Shutdown Cooling System that was discovered on May 17, 1988. In the initial reportability determination dated May 19, 1988, the event was determined to be reportable as a condition prohibited by the TSs. The basis for this determination was the TS requirement for both Shutdown Cooling Trains to be operable when water level above the reactor pressure vessel flange is lowered below 23 feet, which occurred on May 12, 1988. Snubber SISR 1352 was not discovered as being removed (inoperable) until May 17, 1988.

Based on an engineering evaluation which determined that shutdown cooling system operability was not affected by the removal of the snubber, the reportability determination was subsequently revised (Revision 1) on June 2, 1988 to classify the event as not reportable. It is noteworthy to mention that a recommendation was made in the evaluation to remove snubber SISR 1352 during the next refueling outage and a modification has since been approved to do so.

Revision 2 to the reportability determination was issued on June 21, 1988 reclassifying the event as a reportable LER due to a condition prohibited by TSs. The basis for reclassifying the event as reportable was that even though SISR 1352 is not required for Shutdown Cooling System operability, the snubber was still under the control of TS 3.7.8 thereby requiring it to be operable.

Since Revision 2 to the reportability determination was dated after the expiration of 30 days from the event discovery, it was necessary to use the guidance provided in NUREG-1022, Supplement 1 ("Licensee Event Report System") to develop an adequate timeframe for drafting and approving an LER. Section 14 of NUREG-1022 states, in part, "The LER must be submitted within 30 days of discovery of the event or condition that is reportable." Accordingly, LER 88-017 was issued on July 11, 1988, which was within 30 days from Revision 2 to the event reportability determination, when the condition was discovered to be reportable. Since Section 14 of NUREG-1022 also states that "If the LER is not submitted with 30 days from the event date, explain the relationship between the event date, discovery date, and report date in the LER text", this information was explicitly provided in LER 88-017.

The reportability determinations associated with this event represent a good faith interpretation of reporting regulations and guidelines by plant staff. In this particular incident, the issue of reportability was initially believed to be the operability of the Shutdown Cooling System, which was satisfactorily resolved. However, the snubber was still administratively controlled by TSs which was not considered until later.

(2) Corrective Actions That Have Been Taken

All four items have been reported in the proper LER format.

(3) Corrective Actions Which Will Be Taken

Revisions to LER 87-030 and LER 87-031 will be submitted by October 15, 1988, to appropriately classify them as conditions prohibited by TSs.

(4) Date When Full Compliance Will Be Achieved

Full Compliance will be achieved by October 15, 1988.

B. VIOLATION NO. 8819-02

Failure To Follow Procedures

Technical Specification 6.8.1.11 requires, in part, the implementation of procedures covering activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, including the procedures for abnormal, off-normal, or alarm conditions.

The licensee's Operating Procedure OP-4-020, Revision 0, "Bypassed and Inoperable Status Indication Systems," requires monitoring of safety equipment status by way of computer and requires operator acknowledgement of annunciator alarms in evaluation of systems that have been computed to be inoperable.

Contrary to the above, the inspectors observed alarming annunciators in the control room which had not been acknowledged on February 5 and 9, 1988. In addition, on February 8 and 10, 1988, the inspectors observed annunciators alarm (Containment Isolation and Emergency Feedwater related, respectively) which were not acknowledged as specified by procedure.

This is a Severity Level V violation.

RESPONSE

LP&L acknowledges that a violation of TS 6.8.1.a existed when operators failed to acknowledge Bypassed and Inoperable Status Indication System indicator actuations in accordance with OP-4-020.

(1) Reason For The Violation

The purpose of the Bypassed and Inoperable Status Indication System (BISIS), as delineated in Operating Procedure OP-4-020, is to provide the operator with a supplemental means of identifying bypassed and inoperable safety system conditions. The system is not designed to be used in place of plant administrative procedures when determining bypassed or inoperable equipment. Nonetheless, when an operator sees that a system is computed as inoperable, his actions in accordance with OP-4-020 are to initially acknowledge the signal (by depressing the applicable pushbutton), then evaluate the status of the equipment which caused the computer to illuminate an indicator. Based on the importance of ensuring that equipment is properly operating, the more logical sequence for an operator to follow is to first determine the validity of a BISIS indicator by evaluation; then, acknowledge the indication if valid or insert an appropriate value for the point in question, log the required information on the BISIS Point Deviation Sheet (Attachment 8.5 of OP-4-020) and generate a condition identification (CI) accordingly if invalid.



During the incidents cited in the Inspection Report, the operators, acting on plant knowledge and past experiences with invalid indications, chose to evaluate the equipment status prior to acknowledging the BISIS indicator which resulted in the procedure violation. It is important to note that the fact that the operators were aware of the status of the monitored systems in question, that the systems were verified as being operable, was substantiated by the NRC Inspectors (as noted in Inspection Report 88-200). Also, since the invalid indications were spurious in that the appropriate values reappeared prior to having them inserted, no further action was required by the operator.

(2) Corrective Actions That Have Been Taken

Effective August 19, 1988, Operating Procedure OP-4-020 was revised to change the sequence in which an operator responds to a BISIS indication. The current sequence, which is a more realistic and logical approach for responding to such indications, is as follows: first, when an operator sees that a system is computed as inoperable, he should evaluate the status of the equipment that caused the BISIS indication as soon as possible; then, if valid, the operator acknowledges the signal by depressing the associated pushbutton or if invalid, he generates a CI to correct the problem.

(3) Corrective Actions Which Will Be Taken

Although not specifically part of the corrective actions completed to date for this violation, it is important to note that System Engineering is currently performing an evaluation of the BISIS logic. The purpose of this evaluation is to identify improvements that will reduce the number of invalid indications. This evaluation will be completed by October 31, 1988. Any necessary station modifications will be initiated at that time.

(4) Date When Full Compliance Will Be Achieved

For the purposes of this violation, the corrective actions completed to date are sufficient to prevent recurrences.

C. VIOLATION NO. 8819-03

Failure To Follow Procedures

Criterion V of Appendix B to 10 CFR Part 50 requires, in part, activities affecting quality to be accomplished in accordance with instructions, procedures, or drawings.

The licensee's Work Authorization WA-01020904 required the motor-driven firewater pump to be reassembled in accordance with Technical Manual 457000514, Volume 2.

Contrary to the above, the applicable section of this technical manual, entitled "Repair Instruction, Type A Centrifugal Pumps," was not followed. Step 3-2.f provided instructions to cover the top side of the casing gasket with a mixture of graphite and oil," Steps 3-2.f and 3-2.h provided instructions to "rotate shaft by hand to check that it runs free," and Step 3-2.g provided instructions to "insert the glands and set them to finger tight - DO NOT USE A WRENCH." None of the above steps were performed as required during the performance of Work Authorization WA-01020904.

This is a Severe "V" violation.

RESPONSE

LP&L admits this violation in that steps provided in a section of a technical manual that was being used during the performance of the motor-driven firewater pump reassembly under Work Authorization 01020904 were not followed in accordance with Maintenance Administrative Procedure MD-1-014, "Conduct of Maintenance".

(1) Reason For The Violation

In accordance with Subsection 4.6 of Plant Administrative Procedure UNT-5-015, "Work Authorization Preparation and Implementation", one of the lead discipline planner's responsibilities is to write work instructions and assemble work packages. Step 5.6.7 of UNT-5-015 specifically states that approved technical manuals, or portions thereof, may be referenced for use as a part of the work instruction. Based on the above and the guidance provided in Maintenance Departmental Procedure MD-1-026, "Maintenance Department Work Center Planning", the lead discipline planner, who was a mechanical maintenance contractor, listed Technical Manual 457000514, Volume 2, "Type A Centrifugal Pumps", as a reference to be used under Work Authorization (WA) 01020904 for overhauling the motor-driven firewater pump.



Section 5.2 of Maintenance Administrative Procedure MD-1-014, "Conduct of Maintenance" provides guidance in the use of vendor and technical manuals in performing maintenance/modification activities. Step 5.2.6 of MD-1-014 states that a vendor manual shall be treated as a design document and if a configuration, procedural, or specification discrepancy is identified, immediate corrective action shall be taken by notifying the first line supervisor and generating, as appropriate, a Condition Identification or Project Evaluation/Information Request. Furthermore, Step 5.2.7 specifically states that if, during the performance of any activity requiring the use of a vendor technical manual, deviations from the recommendations or procedures in the manuals are necessary, such deviations shall receive a documented technical review by Maintenance Engineering and be approved by the cognizant Maintenance Assistant Superintendent unless procedures specify a different review and approval method for the case in question. In addition to the above, Section 5.3 of MD-1-014 describes the control and use of procedures and instructions during the maintenance or modification of equipment. Step 5.3.1 states that maintenance or modification of equipment shall be preplanned and performed in accordance with written procedures, documented instructions or drawings appropriate to the circumstances. Step 5.3.1 also notes that detailed step-by-step delineations need not be provided in the written procedure or instruction for skills normally possessed by qualified maintenance personnel.

Consequently, acting on previous experience, Step 5.3.1 of MD-1-014 and the listed work instructions, which referenced Technical Manual 457000514, Volume 2, and did not provide any step-by-step delineations, the person performing the field work, a maintenance technician, inferred that full compliance with the manual in this case was not required. Accordingly, 3 specific steps contained in FMC Corporation, Peerless Pump Division, Bulletin No. 2880551, "Repair Instructions, Type A Centrifugal Pumps", which is a section of the Manual, were not followed thereby violating Steps 5.2.6 & 5.2.7 of MD-1-014 as stipulated above.

(2) Corrective Actions That Have Been Taken

The technician directly responsible for the violation and his supervisor were counselled on the importance of procedure compliance with regard to following technical manuals when used as work instructions for maintenance or modifications. Although the work plan was developed in accordance with the appropriate procedures, management felt it prudent to discuss the violation with the planners during their weekly meeting to remind and instill in them the importance of complying with approved procedures when writing work instructions and assembling work packages. (This discussion was held on Friday, September 23, 1988 and has been documented accordingly.)

(3) Corrective Actions Which Will Be Taken

A meeting for maintenance department heads, first line supervisors and lead workers will be held by October 31, 1988 to discuss the violation in detail and to provide retraining/ counselling on the necessity of strict compliance with approved procedures and work instructions.

(4) Date When Full Compliance Will Be Achieved

Full Compliance will be achieved by October 31, 1988.

D. VIOLATION NO. 8819-05

Failure To Perform Special Process With Appropriately Qualified Personnel

10 CFR 50, Appendix B, Criterion IX, requires, in part, that measures shall be established to assure that special processes are accomplished by qualified personnel.

The licensee's Nuclear Operations Management Manual, Section V, Chapter 9, Revision 3, lists the installation of fire seals as a special process.

Contrary to the above, the licensee presented a list containing names of personnel who have performed the installation of fire seals but were not qualified in that they received no formal training and they had no previous experience in the process of fire seal installation.

This is a Severity Level IV violation.

RESPONSE

LP&L admits this violation in that the installation of fire seals was not performed by personnel qualified to the criteria contained in Chapter 9, Section V of the LP&L Nuclear Operations Management Manual (NOMM) entitled, "Control of Special Processes".

(1) Reason For The Violation

It is important to note that LP&L feels that the root cause of this violation is that the installation of fire seals was inappropriately classified as a special process in the NOMM thereby requiring qualifications of personnel performing fire seal installations beyond those that are required by existing regulations for this activity. Therefore, a discussion on the history for classifying the installation of fire seals as a special process in Section V, Chapter 9 of the NOMM is warranted.

On 12/21/87, the installation of fire seals was incorporated in the NOMM list of special processes during revision 3 of Chapter 9, Section V. The basis for this inclusion was that since the Site Quality Organization was being merged into the Nuclear Quality Assurance (QA) Organization, all activities delineated in the Site Quality Procedures (QPs) that were not already included in existing QA documents were being reviewed for incorporation into appropriate documents if necessary. Subsequently, since this activity was listed as a special process in QP-009-001, "Control of Special Processes" but was not listed as a special process in the QA Program (FSAR Chapter 17.2), a decision was made to include such information in the NOMM for administration purposes but not to change our commitment to the FSAR. Justification for including this information in the NOMM was to preserve the original reason for having it listed in QP-009-001

- namely to provide extra assurance that a designated inspector would provide independent verification of fire seal installations, not for requiring certified qualifications of the person actually performing the installation.

In addition to the above, it is just as important to discuss why LP&L feels that this activity is not a special process as defined by the requirements of 10CFR50, Appendix B, Criterion IX, "Control of Special Processes" and should not have been listed as such in the NOMM (nor in QP-009-001). Criterion IX of 10CFR50, Appendix B requires that measures be established to assure that special processes, including welding, heat treating, and nondestructive testing, are controlled and accomplished by qualified personnel using qualified procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements. FSAR Subsection 17.2.9 lists and describes the special processes, of which the installation of fire seals is not one of them, controlled under the QA Program at Waterford 3. LP&L believes that the requirements provided in Subsection 17.2.9 not only meet but exceed the requirements of Criterion IX of 10CFR50, Appendix B and do not apply to the installation of fire seals. This activity is rightfully governed by the QA Program for Fire Protection which is specifically defined in NOMM Section VI, Chapter 1, "Fire Protection" (Reference FSAR Subsection 17.2.2.10).

The 10CFR50, Appendix B criteria applied to Fire Protection include: Design and Procurement Document Control; Instructions, Procedures and Drawings; Control of Purchase Material, Equipment and Services; Inspection; Test Control; Inspection, Test and Operating Status; Nonconforming Items; Corrective Action; Quality Assurance Records; and Audits. In accordance with 10CFR50, Appendix B, Criterion V, "Instructions, Procedures and Drawings", activities affecting quality shall be prescribed by documented instructions, procedures or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these documents. With regard to the installation of fire seals, Subsection 3.3 of NOMM Section VI, Chapter 1, (Instructions, Procedures, and Drawings) states in Item (c) that the installation or application of penetration seals, cable wraps, and fire retardant coatings is performed by trained personnel using approved procedures. The installation of fire seals at Waterford 3 is performed by contractors in accordance with ME-13-100, "Fire Barrier Installation and Rework". The procedures for governing Waterford 3's Contractor Training and Qualification Program are detailed in Nuclear Training Procedure NTP-109 and Nuclear Training Course Description NTC-129, both of which are titled "Maintenance Department Contractors Training and Qualification."

The Waterford 3 Contractor Training and Qualification Program provides the qualification of personnel for particular jobs based on previous experience and education. Prior to approving qualification, an LP&L Management review of the employee's previous education and experience is conducted to ensure that the

employee meets the intent of ANSI-3.1, 1978, "Selection and Training of Nuclear Power Plant Personnel". Subsections 3.2.4 and 4.5.3 of this standard state (in part) that maintenance personnel, including persons principally involved in the repair, maintenance or performance of other craft and technician activities in the plant, shall have three years working experience in one or more crafts; should possess a high degree of manual dexterity and ability; and should be capable of learning and applying basic skills in maintenance operations.

Based on the above, the qualification of the personnel installing fire seals met the ANSI-3.1 requirements but did not meet the certification requirements dictated in NOMM Section V, Chapter 9, hence the violation.

(2) Corrective Actions That Have Been Taken

To support the above, LP&L has further investigated the records of those persons performing the fire seal installation to verify that they were in fact qualified. Relative to the requirements of ANSI 3.1-1978, Qualification Summary Forms entitled "Insulation Mechanic/Fire Barrier Installation and Repair" for the personnel who performed the fire seal installations/reworks, all of which were approved by the Nuclear Operations Construction Manager and the Training Superintendent/Training Supervisor, are on file for review. These people were either administratively trained in the installation of fire seals or were directly supervised by maintenance personnel that were administratively trained. Also, the foremen of the associated crews were administratively trained and the Area Supervisor was certified in accordance with a Vendor Training Program which included penetration seal training.

(?) Corrective Actions Which Will Be Taken

To alleviate the discrepancy between the QA Program description as described in the FSAR and the NOMM, Section V, Chapter 9 of the NOMM will be revised to delete the installation of fire seals from the list of special processes.

Although LP&L does not consider the installation of fire seals to be a special process, a high level of attention has always been given to the performance of this activity. To ensure that fire seals will continue to be installed properly by qualified personnel, the following additional measures will be implemented. ME-13-100, "Fire Barrier Installation and Rework" is currently being separated into two new procedures to better differentiate the requirements for installing/reworking fire seals from those for installing/reworking fire wraps, to make the procedure for each easier to follow and to reassign procedural responsibility to the Nuclear Operations Construction Group. Nuclear Operations Construction Procedures NOCP-300 and NOCP-301 are being developed to address fire wrap and fire seal installation, respectively. To enhance the existing contractor training and qualification requirements for personnel involved in the installation of fire

seals, NTC-129 will be revised to require that employees pursuing qualification in the area of fire barriers satisfactorily complete training on ME-13-100 (NOCP-300 and NOCP-301 once approved).

(4) Date When Full Compliance Will Be Achieved

Section V, Chapter 9 of the NOMM will be revised by October 31, 1988. Nuclear Training Procedure NTC-129 will be revised to include fire barrier training requirements by October 31, 1988. Procedures NOCP-300 and 301 will be completed by December 30, 1988.