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June 22, 1988

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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 88-11

Attached is the Louisiana Power and Light Company (LP&L) response to Violation No. 8811-01 identified in Inspection Report No. 88-11.

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
Manager -

Nuclear: cy & Regulatory Affairs

RFB:FSP:ssf

Attachment

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LP&L Response to Violation No. 8811-01

Failure to Follow Procedures with Respect to Evaluation
of Quality Notices for 10 CFR Part 21 Reportability

Criterion V of Appendix B to 10 CFR Part 50 requires that activities affecting quality shall be prescribed by and accomplished in accordance with documented instructions, procedures, or drawings of a type appropriate to the circumstances.

Paragraph 5.1.5 of Nuclear Operations Procedure NOP-005, Revision 1, states, "A copy of each QN shall be sent to Nuclear Services Licensing for 10 CFR Part 21 review."

Paragraph 5.1.3 of Nuclear Services Procedure NSP-105, Revision 1, requires the Operational Licensing Unit Supervisor, or his designee, to review Quality Notices (QNs) for reportability and document such reviews on review sheets.

Contrary to the above, the following was noted with respect to QNs issued during 1986 and 1987:

1. There was no evidence to indicate that seven valid QNs had been received by Nuclear Services Licensing for 10 CFR Part 21 review; i.e., QA 86-137, QA 86-090, QA 87-123, QA 87-113, QA-87-069, QA 87-028, and QA 87-001.
2. Review for reportability was not documented on review sheets by the Operational Licensing Unit Supervisor, or his designee, for ten received valid QNs; i.e., QA 86-124, QA 86-134, QA 86-054, QA 86-027, QA 86-005, QA 86-009, QA 87-116, QA 87-077, QA 87-066, and QA 87-007.

This is a Severity Level IV violation.

RESPONSE

(1) Reason For The Violation

With respect to the above 17 QNs, our investigation revealed the following:

- a) QA 86-005 and QA 86-009 were written against Licensing for failure to prepare/implement procedures to control safety related activities. In responding to the finding, Licensing performed a Part 21 evaluation and implemented the appropriate corrective actions necessary to prevent recurrence. However, Licensing inadvertently failed to document the Part 21 review on the QN log sheet, apparently due to the method in which these QNs were received by Licensing. Normally, QNs are transmitted to Licensing specifically for Part 21 review; however, these QNs were assigned to Licensing for determination and implementation of corrective action.

- b) QA 87-007 was properly evaluated for Part 21 applicability by Licensing but inadvertently logged as QA 87-006, which was invalidated very shortly after origination. This is strictly a numbering error in the QN log.
- c) QA 86-134 was voided prior to issuance, and is therefore, not a valid QN.
- d) Unless a QN is written against Licensing, there is no mechanism for Licensing to acknowledge receipt of QNs transmitted for Part 21 reviews. Therefore, for the remaining 13 QNs, there is no evidence QA transmitted them to Licensing. Upon review of procedure QAP-012 (Rev. 6), "Corrective Action", some QA personnel incorrectly interpreted step 5.1.3 to imply that only those QNs which identify a potentially reportable event be transmitted to Licensing.

(2) Corrective Actions That Have Been Taken

Licensing has received from QA all QNs discussed in this Violation and reviewed them for Part 21 reportability. As indicated on the review log sheet, none of these QNs are reportable pursuant to 10CFR21. In addition, Licensing has received, reviewed, and documented all valid QNs issued this year as of June 8, 1988. Review of Licensing's QN log indicates that all valid QNs were properly reviewed for Part 21 reportability prior to 1986. This Violation and the associated procedural requirements have been discussed with the Site Licensing Support Supervisor. He is fully aware of his responsibilities concerning QNs regardless of the method of receipt.

Quality Assurance revised QAP-012, effective June 15, 1988, to clarify the requirement that all QNs are to be transmitted to Licensing. QA personnel were trained on this latest procedure revision on June 9, 1988.

(3) Corrective Actions To Be Taken

As stated in the subject Inspection Report, the Event Analysis Reporting and Response (EAR&R) group will be assuming lead responsibility for review and coordination of potentially reportable 10CFR Part 21 items. This group will be evaluating the QN review process for potential improvements to ensure all QNs are properly received, reviewed, and documented. Any enhancements, as determined by EAR&R, will be included in procedure UNT-6-015, "Identification, Evaluation and Reporting of Defects and Noncompliances Under 10 CFR 21", which will be the new implementing procedure for Part 21 reviews. These actions should be completed by July 1, 1988.

(4) Date When Full Compliance Will Be Achieved

July 1, 1988