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April 25, 1986

W3P86-0191 A4.05 QA

Mr. G.W. Knighton, Director PWR Project Directorate No. 7 Division of PWR Licensing-B Office of Nuclear Reactor Regulation Washington, D.C. 20555

SUBJECT: Waterford SES Unit 3

Docket No. 50-382

NPF-38, License Condition 2.C.16b

REFERENCE: Letter W3P85-2520, K.W. Cook to G.W. Knighton

Dear Mr. Knighton:

Paragraph 2.C.16b of Facility Operating License NPF-38 required that Louisiana Power & Light Company modify the existing training program to include training on the "Lessons Learned" which had been identified from the investigation, review, and resolution of the issues resulting from the NRC Waterford Task Force investigations in 1984. Completion of this action and confirmation of fulfillment of the license condition was provided by the referenced letter.

LP&L has provided this supplemental training for the past year and has concluded that while it has been beneficial, now that all plant personnel have been through the modified training program, little benefit is derived from continuing with the full program. However, rather than delete this supplemental training aspect altogether, LP&L intends to phase out the program in stages. LP&L will provide the "Lessons Learned" training in full to new hires filling positions in the LP&L Quality Assurance organization and, in addition, will provide refresher training for personnel within this organization. This modified training program will be continued from May 1, 1986 to May 1, 1988 at which time LP&L will discontinue "Lessons Learned" training for all personnel.

While LP&L considers that the requirements of paragraph 2.C.16b have been fulfilled, the decision to modify the training program has been based on a number of other factors as well. First, education of Waterford personnel on "Lessons Learned" has not been limited to the formal training program. LP&L QA has published a monthly newsletter to employees which has included a feature article in each issue dealing with one or more of the twenty-three issues and which includes discussion of the "Lessons Learned". These same "Lessons Learned" have also been factored, as appropriate, into the Waterford Operational Quality Assurance Program. The attention and importance placed upon these "Lessons Learned" by LP&L management as well as the informal and formal training provides a high degree of assurance that Waterford 3 personnel are cognizant of

the issues and their ramifications to the quality of Waterford 3. Following the two year period of the modified program, the Operational QA Program will be well established and continued supplemental training should not be required. Unlike the construction/completion phase of the project where Ebasco and other contractors were responsible for a large portion of the QA/QC activities, during the operation phase, LP&L has direct oversight over all QA/QC activities. The modified program does provide for training of the key personnel involved with QA during the next two years.

Since the requirements of paragraph 2.C.16b have been satisfied, as confirmed by the reference letter, LP&L does not believe that NRC approval is necessary prior to making the changes described above and intends to implement these changes effective May 1, 1986. However, if you have any questions or concerns regarding these actions, I would be pleased to discuss them with you.

Very truly yours,

Fw Cook

K.W. Cook

Nuclear Support & Licensing Manager

KWC/ch

cc: B.W. Churchill, W.M. Stevenson, R.D. Martin, J. Wilson, J.G. Luehman