

LOUISIANA
POWER & LIGHT

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September 27, 1985

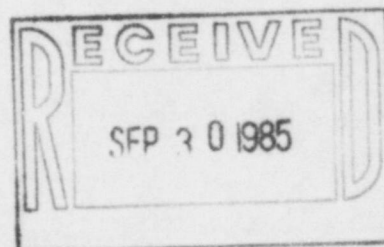
W3P85-1480

A4.05

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 85-20



Attached is the Louisiana Power & Light Company responses to Violation No. 8520-04 and 8420-05 which are cited in the subject NRC Inspection Report.

The violation response is submitted under affidavit as required by Section 182 of the Atomic Energy Act of 1954, as amended.

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

Very truly yours,

K.W. Cook

Nuclear Support & Licensing Manager

KWC:GEW:sms

Attachments

8511110056 851031
PDR ADOCK 05000382
Q PDR

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

IC-153/85

LP&L Response to Violation in Inspection Report No. 85-201. VIOLATION NO. 8520-05Failure to Meet Operational Mode Requirements

Technical Specification 4.0.4 requires that "Entry into an OPERATIONAL MODE or other specified conditions shall not be made unless the surveillance requirement(s) associated with the limiting condition for operation have been performed within the stated surveillance interval or as otherwise specified.

LP&L Operating Procedure OP-10-001, Revision 4, "General Plant Operations," requires that when entering Mode 4 (hot shutdown) both emergency diesel generators be operable.

Contrary to the above, on June 11, 1985, Waterford 3 was in Mode 5 (cold shutdown) while performing Surveillance Procedure OP-903-069, "Integrated Emergency Diesel Generator/Engineered Safety Features Test." As part of the above procedure, operations personnel were attempting to prove the operability of the Emergency Diesel Generator B automatic load sequence timer. However, operations personnel did not review the test data until 1545 hours on June 20, 1985. Waterford entered Mode 4 (hot shutdown) at 1028 hours on June 20, 1985, with Emergency Diesel Generator B inoperable due to Load Block 7 being out of tolerance.

This is a Severity Level IV Violation (50-382/8520-05).

RESPONSE TO THE VIOLATION(1) Reason for the Violation

The condition occurred because the data associated with the subject surveillance procedure is voluminous and Operations Personnel did not complete the data review prior to changing modes.

(2) Corrective Steps Taken and Results Achieved

The above described condition was identified by Waterford 3 Plant Operators on June 20, 1985 and was reported to the Commission pursuant to 10CFR50.73(a)(2)(i)(B) (see LER-85-025). All shift supervisors have been informed of their responsibility to ensure all relevant surveillances have been satisfactorily performed and reviewed prior to mode changes.

(3) Corrective Actions That Will Be Taken

No further actions are deemed necessary.

(4) Date When Full Compliance Will Be Achieved

All corrective actions were completed August 2, 1985.

2. VIOLATION NO. 8520-04

Failure to Conduct a Proper 10 CFR 50.59 Review

Title 10 of the Code of Federal Regulations, Part 50.59 requires, in part, that the licensee shall perform and maintain a written safety evaluation which provides the basis for the determination that the changes in the facility, as described in the Safety Analysis Report (SAR), do not involve an unresolved safety question.

Contrary to the above, on June 25, 1985, the NRC inspector noted that LP&L Operating Procedure OP-03-014, "Control Room Heating and Ventilating," provided the normal lineup of the emergency outside air intake valves which was different than the lineup described in the Final Safety Analysis Report (FSAR). The NRC inspector found no evidence that a proper 10 CFR 50.59 review was conducted to calculate dose rates which an operator would experience if these valves had to be manually opened from outside the control room.

This is a Severity Level IV violation (50-382/8520-04).

RESPONSE TO THE VIOLATION

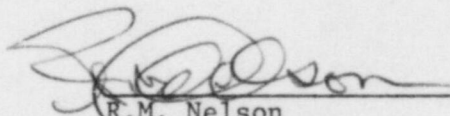
Although the Emergency Outside Air Intake valve positions specified in Operating Procedure OP-03-014, Revision 1, Control Room Heating and Ventilating, differs from the normal operating mode described in the Final Safety Analysis Report (FSAR), the valve positions addressed by this violation are described in the FSAR as the Toxic Gas Emergency Operating Mode (Figure 6.4-3). Because this valve configuration is already described in the FSAR, a 10 CFR 50.59 review was not required. However, a safety review was performed by LP&L, the results of which revealed that the valve lineup described in the above violation did not constitute an unresolved safety question. This was not a surprise since it already represented an operating condition allowed in the FSAR. LP&L feels that as a result this item should not be a violation. It is requested that this violation be cancelled.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the matter of

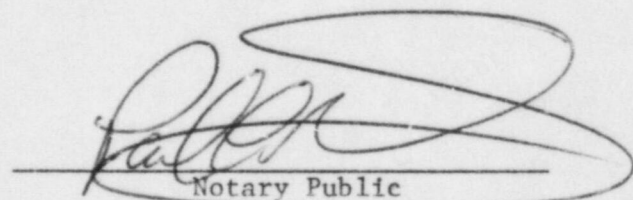
Louisiana Power & Light Company
Waterford 3 Steam Electric Station)
)
) Docket No. 50-382
)AFFIDAVIT

R.M. Nelson, being duly sworn, hereby deposes and says that he is Nuclear Licensing Manager of Louisiana Power & Light Company; that he is duly authorized to sign and act on behalf of K.W. Cook, Nuclear Support & Licensing Manager and file with the Nuclear Regulatory Commission the attached responses to Violation Nos. 8420-04 and 8520-05; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.



R.M. Nelson
Licensing Manager-NuclearSTATE OF LOUISIANA)
) ss
PARISH OF ST. CHARLES)

Subscribed and sworn to before me, a Notary Public in and for the Parish and State above named this 27th day of September, 1985.



Notary Public

My Commission expires at death.