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MIDDLE SOUTH UTILITIES SYSTEM
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November 13, 1986

W3P86-2800
A4.05
QA

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

Subject: Waterford 3 SES
Docket No. 50-382
License No. NPF-38
NRC Inspection Report 86-16

Dear Mr. Martin:

Attached is the Louisiana Power & Light Company (LP&L) response to Violation Nos. 8616-02, 8616-03 and 8616-05 which were cited in the subject NRC Inspection Report.

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

K.W. Cook
Nuclear Support & Licensing Manager

KWC:KLB:ssf

cc: NRC, Director, Office of I&E
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LP&L RESPONSE TO VIOLATION NOS. 8616-02, 8616-03 and 8616-05

VIOLATION NO. 8616-02

Technical Specification (TS) 6.8.1.f requires that written procedures covering the implementation of the fire protection program be established and implemented. FP-1-017, Revision 2, "Transient Combustibles and Hazardous Materials," is a procedure that implements a portion of the fire protection program. Sections 6.1.18 and 6.3 of FP-1-017 require that combustible liquids shall be placed in safety cans and stored in designated cabinets when not in use.

Contrary to the above, on August 19, 1986, six safety cans, each partially full of combustible liquid, were found unattended in areas containing safety-related equipment.

This is a Severity Level IV violation.

RESPONSE TO VIOLATION

(1) Reason for the Violation

Appendix R to 10CFR50, Section K.1 and 2 mandates a licensee to maintain in effect administrative controls to: (1) Govern the handling and limitation of the use of ordinary combustible materials, combustible and flammable gases and liquids,... and (2) Prohibit the storage of combustibles in safety-related areas or establish designated storage areas with appropriate fire protection. Waterford 3 complies with this requirement by way of implementation of FP-1-017, Transient Combustibles and Hazardous Materials. Specifically, section 6.3.2 states, "Approved safety cans (not exceeding 5 gallon capacity or 2 gallon capacity for Class I liquids) shall be used for storing, transporting and dispensing quantities of flammable and combustible (to include lubricating oils) liquids in buildings"... Section 6.3.3 goes on to say, "When not in use, safety cans containing flammable and combustible liquids shall be stored in an approved flammable liquids storage cabinet"...

Due to a significant oil leak on the Main Steam Isolation Valves (MSIV) it became necessary to temporarily maintain a small quantity of Fyrquel lubricating oil adjacent to the MSIV skid. Fyrquel has a flashpoint of $>455°F$ and is therefore classified as a Class IIIB combustible liquid per NFPA-30, Flammable and combustible liquids code. The addition of this oil in the area constitutes a minor fire hazard at best. In fact, Roof Area E has an area of 3,216 ft^2, with an assumption of 6 full 5 gallon cans of lube oil yielding a total of $4.65E^6$ BTU or $1.44E^3$ BTU/FT^2 this would produce a fire duration of less than 2 minutes for total consumption by fire. Therefore, the danger of safety-related equipment was negligible.

(2) Corrective Action That Has Been Taken

As a conservative means of corrective action an approved flammable liquids cabinet has been placed on the +46 RAB adjacent to the MSIV area so as to allow for the long-term storage of oil in the area should expeditious oil addition become necessary. In the past the rate of consumption of the oil could more accurately be described as usage rather than storage. In which case, a safety can would be the required method or container.

(3) Corrective Action That Will Be Taken

No additional action is felt necessary in that the addition of the flammable liquids cabinet will serve as extra conservatism in providing verbatim compliance with the requirements of FP-1-017.

(4) Date When Full Compliance Will Be Achieved

Waterford 3 is in full compliance at the present time.

VIOLATION NO. 8616-03

10 CFR 73.55(b)(3)(i) requires, in part, written security procedures "which detail the duties of guards, watchmen, and other individuals responsible for security..."

The Waterford 3 physical security plan implements the requirements of 10 CFR 73.55(b)(3)(i).

PS-90-101, Revision 3, "Security Department Organization, Duties and Responsibilities," in part, implements the Waterford 3 physical security plan by detailing the duties and responsibilities of security personnel including the secondary alarm station console operation (SASCO) and the security officer (SO). These duties and responsibilities include monitoring equipment on the SAS console in order to fully implement the site security program.

Contrary to the above, the duties and responsibilities specified in PS-90-101, Revision 3, were not properly implemented in that, on August 29, 1986, the NRC inspector observed that the SAS console was not being properly monitored in that publications not related to the job are being read by the SASCO in the SAS.

This is a Severity Level IV violation.

RESPONSE TO VIOLATION

(1) Reason for the Violation

LP&L acknowledges that on August 29, 1986, the Secondary Alarm Station (SAS) Console Operator (CO) did have unauthorized reading material on his post, the SAS.

The Waterford 3 SES Security Force utilized a Shift Supernumary to relieve security personnel for lunch and other breaks. The supernumary is normally dispatched through the SAS to job assignments. On August 29, 1986 the supernumary was between job assignments and went to the SAS to await further instructions. Enroute to SAS, the supernumary stopped in the mens restroom. While in the restroom, the supernumary found the sports section of the daily newspaper. He picked up the newspaper and took it with him to the SAS.

Upon arrival (approximately 0953 hours) at the SAS the supernumary started reading the newspaper. He handed part of the newspaper to the SASCO who also read the paper. The resident NRC inspector observed these actions and reported same to the Shift Supervisor. The Shift Supervisor relayed this information to the Security Shift Supervisor at approximately 1000 hours.

(2) Corrective Action That Has Been Taken

Immediately upon notification Security supervisory personnel were dispatched to SAS to investigate the complaint. The supervisors

arrived in the SAS at 1004 hours. Upon arrival in the SAS, the supervisors confirmed the NRC complaint; both the SASCO and the supernumary had part of the newspaper in their possession. Both officers were relieved from duty and placed on suspension pending an investigation.

Disciplinary action was administered, as follows:

SASCO:
- Two weeks suspension without pay.
- A 90 day reduction in pay and grade to that of a nuclear watchperson. (At the end of the 90 day probation period, the officer will be eligible to return to Security Officer status).

SUPERNUMARY:
- One week suspension without pay.
- A 90 day reduction in pay and grade to that of a nuclear watchperson. Reduction suspended, and officer placed on 90 day probation.

Waterford 3 SES has a written "Security Force Disciplinary Standard". This standard prohibits having unauthorized reading material while on duty and was in place at the time of the occurrence. Both officers had signed statements that they had read and understood the policy. However, we reissued this disciplinary standard to contract security personnel.

(3) Corrective Action That Will Be Taken

No futher action required.

(4) Date When Full Compliance Will Be Achieved

Action was taken immediately upon notification to Security supervisory personnel.

VIOLATION NO. 8616-05

10CFR50, Appendix B, Criterion X required, in part, that, "A program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity..."

Contrary to the above, the Louisiana Power and Light Company inspection program was not adequately executed to ensure proper installation of certain components as described below:

1. The front and rear anchor welds for the hydrogen recombiner power supply panel B were not installed as required by the installation drawing.

2. One of the anchor bolt nuts for the 120V nuclear instrumentation static uninterruptible power supply 3MBS panel did not have the minimum thread engagement required by installation specifications.

This is a Severity Level IV violation.

RESPONSE TO VIOLATION - PART I

(1) Reason for the Violation

Nonconformance Report W3-6744 was issued on 8/19/83 by the electrical subcontractor denoting that the equipment installation checklist for the Hydrogen Recombiner Panel was not completed, and the installation could not be reverified due to inaccessibility to the interior of the panels.

The reasons for the violations are: (1) the description of the noted deficiency (NCR-W3-6744) was not concise as to which particular installation checklists were not completed (2) the recommended disposition provided by the electrical contractor provided no proposed fix to the problem so as to indicate what the deficiency was and (3) the element of interface being significantly reduced as a result of the electrical contractor destaffing; were all contributing factors that caused the mismatch between problem description and recommended resolution, for the noted NCR.

To explain the aforementioned and how this could happen, the following information is provided. The noted NCR was submitted by the electrical contractor to the Architect-Engineer for logging and further processing as required by program. Per procedure, adequate supporting documentation was to accompany the NCR. Since no checklists were submitted with the NCR, it appears that the NCR was forwarded to the Electrical Engineering Department for review and evaluation of disposition (since it was written by the electrical subcontractor). At the time of the evaluation, it appears that the A-E Electrical engineer understood the lack of installation verification to mean that the internals of the cabinet could not be verified as completed rather that the physical mounting and attachment

of the equipment to its foundation as indicated by the checklists. This could be attributed to the fact that the incomplete checklists were not provided as NCR attachment so as to specifically explain the deficiency.

The A-E Electrical engineer who evaluated the NCR provided documentation attesting to the fact that the internals of the cabinet had been correctly installed as the electrical acceptance tests were successful. The NCR was then closed by an A-E Quality Assurance engineer based on the documentation provided by the electrical engineer which supported the acceptance of the cabinet internals, electrically.

(2) Corrective Action That Has Been Taken

A. Temporary Alteration Request No. 86-095 was issued on 9/4/86 to correct the hardware deficiencies associated with the B Hydrogen Recombiner and work was completed on 9/5/86.

B. Station Modification Package (SMP) 1712 was initiated after it was determined that the seismic qualification of the Power Supply Panel B was deficient. This station modification was issued to revise the design drawings to accurately reflect the as built configuration of the B panel. The update of the drawings was complete on 10/13/86.

C. NCR-W3-6744 was annotated with SMP-1712 to show reference to the document which actually provided corrective action.

D. Nonconformance reports which were generated during the construction phase of the project were reviewed for technical adequacy. The scope of this review included a sampling of NCR's dispositioned and/or evaluated by the electrical engineer and those closed by the QA Engineer who both had provided input to NCR-W3-6744. Also NCR's submitted by the electrical contractor which showed deficiencies as a result of missing or incomplete documentation were reviewed. The intent of this documentation review was to verify that no other conditions similar to this violation exists as a result of misrepresented documentation.

There were a total of thirteen (13) NCR's dispositioned or evaluated by the Electrical engineer that were reviewed to verify the disposition or evaluation adequately addressed the nonconforming condition. In all cases, the disposition or evaluation did adequately address problem description.

There were a total of twenty-six (26) NCR's closed by the QA engineer that were reviewed for adequate closure. The review determined that adequate justification for closure of the NCR's did exist.

There were also twenty-six (26) NCR's that described incomplete or missing documentation by the electrical contractor that were reviewed. Many of these NCR's were the same ones closed by the

QA engineer who closed NCR-W3-6744. It was noticed that these NCR's contained a more clear and concise definition of the problem and an amplified recommended disposition when compared to the NCR that documented the Hydrogen Recombiner deficiency. In all NCR's reviewed, it was determined that the proposed resolution did match the deficiency and the corrective action taken was adequate.

(3) Corrective Action That Will Be Taken

No further action is deemed necessary.

(4) Date When Full Compliance Will Be Achieved

A. SMP-1712 was complete on 10/13/86.

B. Physical work was complete on 9/5/86 via the Temporary Alteration Request No. 86-095.

C. Review of the NCR's was completed on 10/24/86.

D. NCR-W3-6744 was referenced with SMP-1712 notation on 10/31/86.

VIOLATION NO. 8616-05 Continued

RESPONSE TO VIOLATION - PART II

(1) Reason for the Violation

Based on available records, LP&L does not believe that the circumstances in this instance are sufficient cause for LP&L to be cited as having violated 10CFR50 Appendix B, Criterion X. Although two of the anchor bolt nuts on SUS panel 3MB-S were found upon recent inspection to have less than full thread engagement, there is documented evidence that a general QA inspection was performed on the subject anchor bolts following rework of the panel's installation via CIWA-837910, in accordance with the applicable inspection procedure (WQC-169). This inspection indicated that all bolts were tightened at the time and that the work was acceptable. The inspection report no. 5-25-1 wording was of a general nature, and did not individually address verification of each specific criterion of the applicable construction procedure (CP-697). These criteria did require that a minimum of one thread of an anchor bolt must protrude through the nut, but did not require any torquing for ASTM A307 anchor bolts. The inspection report shows no indication of not having met the minimum thread engagement criterion.

(2) Corrective Action That Has Been Taken

LP&L has performed calculations to reconfirm the seismic integrity of the as-found installation of the panel. These calculations were based on a thorough inspection of the panel mounting, including measurement of thread engagements, bolt angles, and nut-to-base plate contact surface areas. Results of these calculations show that the seismic qualification for this panel is still valid.

(3) Corrective Action That Will Be Taken

No further action is deemed necessary.

(4) Date When Full Compliance Will Be Achieved

The calculations performed to reconfirm the installation was acceptable were completed on 9/10/86.