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August 21, 1989

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  
Violation No. 8907-02  
Failure of PORC to Meet in a Quorum  
and Also to Review Radioactive Releases

Gentlemen:

Louisiana Power & Light (LP&L) hereby submits in Attachment 1 supplemental information on the subject violation. This response provides additional information on Item (1) of the violation, the Failure of PORC to Meet in a Quorum, that was discussed in a July 13, 1989 conference call between LP&L and the NRC and was requested in your July 21, 1989 letter. LP&L previously responded to Violation 8907-02 on May 31, 1989 in Letter No. W3P89-3024.

Although LP&L still believes that a violation of Technical Specification Section 6.5.1.5 did not occur, a decision has been made to discontinue sequential contacting of members as an acceptable option for conducting a Plant Operations Review Committee Meeting.

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

Very truly yours,

R.F. Burski  
Manager  
Nuclear Safety & Regulatory Affairs

RFB/TJC/pi  
Attachment

cc: Messrs: R.D. Martin, NRC Region IV  
F.J. Hebdon, NRC-NRR  
D.L. Wigginton, NRC-NRR  
NRC Resident Inspectors Office  
E.L. Blake  
W.M. Stevenson

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ATTACHMENT 1

SUPPLEMENTAL INFORMATION FOR VIOLATION NO. 8907-02

Waterford 3 SES TS 6.5.1 establishes the requirements for PORC. Section 6.5.1.5 states:

"The quorum of the PORC necessary for the performance of the PORC responsibility and authority provisions of these Technical Specifications shall consist of the chairman or his designated alternate and three members, including alternates."

Item (1) of Violation 8907-02 stated that contrary to Technical Specification Section 6.5.1.5, "Walk-through meetings...were held in which PORC did not meet in quorum". However, in each of the cited example meetings where members were sequentially contacted, the required number of PORC members reviewed and signed the required documents. Thus, the central issue is whether a quorum of PORC members must always be present to carry on PORC business.

Plant Administrative Procedure UNT-001-004 (Revision 8) "Plant Operations Review Committee," provides the administrative controls to ensure that formal onsite reviews were conducted by the PORC for activities described in Section 6.5.1 of the Technical Specification. PORC Meeting requirements are described in Section 5.2 of UNT-001-004 (Revision 8). Sub-item 5.2.7 states that a PORC meeting shall be conducted in the following manner:

For a scheduled PORC meeting, a quorum shall be physically present at the same place; OR

For an unscheduled PORC meeting, the Chairman may select one of the following methods to conduct a meeting:

- A. The quorum shall be physically present at the same place; OR
- B. The quorum shall be in continuous communication during the meeting; OR
- C. The members are contacted sequentially to conduct their review and vote. If a dissenting opinion is generated by a voting PORC member, all PORC members shall be informed of such opinion before the item is forwarded to the Plant Manager - Nuclear for approval.

In most cases, items requiring PORC review are placed on an agenda for and subsequently reviewed during scheduled or unscheduled formal PORC meetings. LP&L utilizes this method of review to insure that circumstances which arise and require PORC approval are reviewed at face-to-face meetings which provide a good interchange of ideas.

Occasionally, some items of lesser significance arise for which a PORC review may be required, yet all members may not be present. In the past under these circumstances, the PORC chairman, after his review, may have elected to sequentially contact the PORC members for their subsequent review and approval. Your July 21, 1989 letter stated that the sequential contacting of members is at variance with the quorum requirement of the Technical Specifications and is contrary to the NRC Inspection Manual, Interpretation "STS - Sections 6.5.1.6 c and 6.5.2.7 d," dated January 1, 1982. LP&L does not perceive that the process of sequential contacting of members, as described above, violates this NRC Inspection Manual Interpretation. It is LP&L's opinion that PORC review of proposed technical specification changes are too significant for utilization of the sequential contacting of members. In LP&L's initial response the statement "[a]t times, however, significant circumstances arise that require PORC to perform immediate reviews..." was worded incorrectly. The intended meaning was that a routine or minor matter which required PORC review, in order to support an in progress plant evolution at a time when PORC members were not on site, could be handled by a sequential contacting of the PORC members at the direction of the PORC Chairman. The "significant circumstance" was meant to convey the time sensitive nature of the in progress plant evolution, not the nature of the item presented to PORC.

Although LP&L still believes that a violation of Technical Specification Section 6.5.1.5 did not occur, a decision has been made to terminate the use of the sequential contacting of PORC members. Consequently, Sub-item 5.2.7 of UNT-001-004 will be revised by October 2, 1989 to delete the use of the sequential contacting of PORC members which was previously allowed under method C.