



LOUISIANA
POWER & LIGHT / INTER-OFFICE CORRESPONDENCE

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QA

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U.S. Nuclear Regulatory Commission
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Washington, D.C. 20555

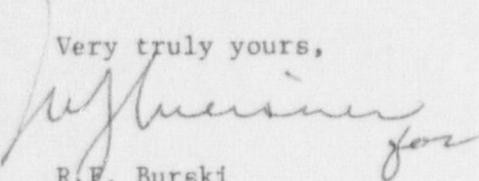
Subject: Waterford 3 SES
Docket No. 50-382
License No. NPF-38
NRC Inspection Report 89-12

Gentlemen:

In accordance with 10 CFR Part 2.201, Louisiana Power & Light hereby submits in Attachment 1 the responses to the Violations identified in Appendix A of the subject Inspection Report.

If you have any questions concerning these responses, please contact L.W. Laughlin at (504) 464-3499.

Very truly yours,


R.F. Burski
Manager
Nuclear Safety & Regulatory Affairs

RFB/DMU/ssf
Attachment

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ATTACHMENT 1

LP&L Responses to the Violations Identified in Appendix A
of Inspection Report 89-12

VIOLATION NO. 8912-02

Inadequate Maintenance Procedure

Technical Specification 6.8.1.a requires, in part, that written procedures shall be established, implemented, and maintained as recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A to Regulatory Guide 1.33 recommends maintenance on safety-related equipment to be performed in accordance with written procedures appropriate to the circumstances.

Contrary to the above, on May 11 and 12, 1989, the instructions in Work Authorization 01037167 were not appropriate and resulted in incorrect washer stacking on the torque switch terminals and improper power supply cable splices during motor actuator reassembly for Valve MS-416.

This is a Severity Level IV violation.

NOTE: Two separate incidents are identified in this violation. For clarity each will be addressed separately.

RESPONSE TO INCIDENT NO. 1

LP&L does not believe that incident No. 1 in Violation 8912-02 constitutes inappropriate work instructions or that incorrect washer stacking occurred.

In accordance with the work instructions of WA 01037167 the torque switch for the motor operator of Valve MS-416 was replaced. The motor operator for this valve is a Limitorque type SMB-000. Because the Limitorque vendor manual (457000468) does not provide specific written instructions for stacking washers on a torque switch terminal, it has been LP&L's practice to reinstall the washers as originally found during determination.

The NRC Inspector has taken exception to this practice and contends that washer stacking on torque switch terminals should be in accordance with page 9 of section A in the Limitorque vendor manual. This page of the vendor manual consists of four diagrams and a parts list for the torque switch used in the SMB-000 motor operator. This page does not contain any written instructions for washer stacking on torque switch terminals. However, by comparing four part numbers from two separate diagrams against the parts list, the Inspector felt a pictorial washer stacking arrangement could be derived from this page.

Maintenance personnel have contacted Limitorque for information regarding washer stacking on torque switch terminals. Limitorque's response was that there is no specific washer stacking arrangement required on the SMB-000 torque switch terminals. Page 9 of the vendor manual is for parts listing and is not intended to be an assembly drawing. As long as all components are used, the stacking order does not affect the termination. Limitorque further stated that no particular sequence is used during initial assembly. Identical model torque switches could have different washer stacking arrangements when purchased and this is acceptable.

A new SMB-000 torque switch was subsequently drawn from warehouse stock for examination. The washer stacking arrangement of this torque switch, received under MRIR 1689-85, did not match the pictorial representation on page 9 of the vendor manual. It was however the same arrangement technicians originally used on the torque switch for MS-416.

Based on the manufacturers' statements, there is no particular washer stacking arrangement required on torque switch terminals. As long as all components are used the termination is acceptable. LP&L's practice of reinstalling the washers as originally found is therefore appropriate.

RESPONSE TO INCIDENT NO. 2

LP&L denies incident No. 2 in Violation 8912-02 as written. The violation states that instructions in WA 01037167 were not appropriate and resulted in improper power supply cable splices. It is LP&L's contention that the splices made per the above WA are acceptable.

According to the instructions in the above work package, technicians were directed to splice the power leads for the motor operator on valve MS-416 in accordance with ME-4-809, section 8.5.2. This section requires the splice be insulated per LOU-1564-B-288 sheet 40 step 6. The subject splices were made in accordance with the WA instructions and this drawing. Contrary to what is stated in the violation, a splice made in accordance with parts A through F of step 6 on drawing LOU-1564-B-288 sheet 40 is a proper power supply cable splice.

LP&L does acknowledge that at the time the splices were performed, a procedure/drawing discrepancy did exist. Drawing B-288 sheet 40 was revised by drawing revision notice (DRN) No. E-8900125. The general notes on this page were revised to be consistent with the splice details and General Notes on Drawing B-288 sheet 34. The general notes on B-288 sheet 40 were revised and renumbered. What had been note 6 became note 3. Although the note numbering changed, the insulating instructions remained essentially the same.

Maintenance personnel working under WA 01037167 had both versions of B-288 sheet 40 in their work package. In accordance with the instructions of the work package, the technicians performed the motor lead splices in accordance with note 6 of the superceded drawing as directed by ME-4-809 step 8.5.2.3. The technicians were aware of the discrepancy caused by the DRN and should have suspended work until the matter was clarified. However, the existence of a note numbering inconsistency in no way detracts from the acceptability of the splices. The splices had been performed in accordance with a valid method and are therefore acceptable.

In recognition of what occurred, Quality Notice QN No. QA-89-124 was immediately written on the above procedure deficiency. As part of the response to the QN, ME-4-809 revision 4 will be revised to eliminate the note conflict with drawing B-288 sheet 40. Furthermore, Maintenance personnel will be instructed as to the proper course of action should procedural discrepancies of this nature be encountered in the future.

Based on the information provided above, LP&L requests that incident Nos. 1 and 2 of Violation 8912-02 be re-evaluated.

VIOLATION NO. 8912-03

Failure to Follow Radiological Protection Control Procedures

Technical Specification 6.11.1 requires, in part, that approved procedures for personnel radiation protection shall be adhered to for all operations involving personnel radiation exposure. Paragraph 4.8.6 of approved radiation protection Procedure HP-1-110, Revision 8, "Radiation Work Permits," requires observing and abiding by radiation work permits and posted radiological signs. Standing Radiation Work Permit (RWP) 89000002 requires Health Physics permission prior to entering radiologically restricted or high radiation areas. In addition, RWP 89000002 requires full anti-contamination protective clothing when climbing into contaminated areas.

Contrary to the above, on May 26, 1989, an auxiliary operator entered the Low Pressure Safety Injection Pump area, which had radiological postings stating "Radiological Restricted Area," "High Radiation Area," and "No Entry Without Health Physics Permission," without obtaining Health Physics permission. In addition, several operations personnel were observed climbing in areas posted as contaminated without wearing required full protective clothing.

This is a Severity Level IV violation.

RESPONSE

(1) Reason For The Violation

The root cause of this violation was failure by Operations personnel to comply with Paragraph 4.8.6 of Radiation Protection Procedure HP-1-110, Revision 9 which states that individuals working under a radiation work permit are responsible for observing and abiding by the radiation work permit and the radiological signs posted within the RCA. Radiation Work Permit (RWP) 89000002, Task Number 1, addresses nuclear auxiliary operations watchstanding duties (RAB & RCA) and valve line-ups, including entry into high radiation areas. Items 1 and 9 of the special instructions in this RWP state the following:

1. Minimum protective clothing requirements for contaminated areas are partial protective clothing (cotton liners, rubber gloves, plastic booties, and rubber overshoes) unless otherwise specified by Health Physics. Kneeling/sitting/climbing in contaminated areas requires full protective clothing.
9. Contact Health Physics prior to entering radiologically restricted areas, high radiation areas, or zone 3 hot particle areas.

Contrary to special instruction #1, several Operations personnel were observed by the NRC Resident Inspector climbing in areas posted as contaminated without wearing full protective clothing (P.C.'s).

Also, on May 26, 1989 at approximately 0900 hours, the NRC Resident Inspector observed an infraction of special instruction #9. An auxiliary operator, already dressed in full protective clothing and inside the contaminated area of the B safeguards pump room, reached across a radiologically restricted area boundary to operate valve SI-1142B without first obtaining Health Physics permission.

(2) Corrective Steps That Have Been Taken And The Results Achieved

Radiological Deficiency Report 89-12 was written against the auxiliary operator for reaching across a radiologically restricted area boundary. The operator's TLD was pulled and he was counselled on the requirements for entering radiologically restricted areas. The operator was then required to attend General Employee Training (GET) 2, Radiation Worker Training requalification, prior to having his TLD reissued and assuming his normal duties. An Operations department daily instruction entry was made to emphasize the requirements of notifying Health Physics department prior to entering radiologically restricted areas.

In addition, letter number W3089-0058 dated June 22, 1989 from the Operations Superintendent was issued to the Operations department to stress their responsibility for observing and abiding by radiological signs posted within the RCA and RWP instructions, in particular climbing without full protective clothing.

(3) Corrective Steps Which Will Be Taken To Avoid Further Violations

The actions taken in (2) should prevent a recurrence of this type of violation in the future.

(4) Date When Full Compliance Will Be Achieved

Based on the above information, LP&L is currently in full compliance.