

AUG 31 1989

In Reply Refer To:  
Docket: 50-382/89-08

Louisiana Power & Light Company  
ATTN: J. G. Dewease, Senior Vice President  
Nuclear Operations  
317 Baronne Street  
New Orleans, Louisiana 70160

Gentlemen:

Thank you for your letter of June 15, 1989, in response to our letter and Notice of Violation dated May 16, 1989. We have reviewed your reply and find it responsive to the concerns raised in Example 1 of our Notice of Violation. However, we need additional clarification of the statement in your response that implied that your mechanical maintenance personnel believed that Essential Chiller B was contaminated. The inspector did not see any radiological control in effect, and there was no specific radiological work permit. We would not expect to see trained radiation workers breaching systems believed to be contaminated without such controls. Please provide a supplemental response to clarify this matter.

Your basis for denial of Example 2 of the violation has been reviewed and we have concluded that the facts presented do not provide sufficient basis for withdrawal of this portion of the violation. The mechanic applying the torque wrench with an adaptor did not demonstrate an understanding of torque wrench adaptor effects on torque application. Therefore, a procedure was needed for reference. Please provide a supplemental response to this violation example to clarify this matter along with corrective actions to prevent recurrence.

Your basis for denial of Example 3 of the violation has been reviewed and we have concluded that the facts presented do not provide sufficient basis for withdrawal of this portion of the violation. The inspector identified the missing fasteners after the maintenance technicians completed the required procedural inspection for loose or missing parts. This has been discussed with your maintenance department manager and he has committed to take appropriate corrective action. Please provide a supplemental response to this portion of the violation, which identifies the corrective actions taken.

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Please provide the above noted supplemental responses within 30 days of the date of this letter.

Sincerely,

James L. Milhoan, Director  
Division of Reactor Projects

cc:

Louisiana Power & Light Company  
ATTN: R. P. Barkhurst, Vice President  
Nuclear Operations  
P.O. Box B  
Killona, Louisiana 70066

Louisiana Power & Light Company  
ATTN: J. R. McGaha, Jr., Plant Manager  
P.O. Box B  
Killona, Louisiana 70066

Louisiana Power & Light Company  
ATTN: R. F. Burski, Manager, Nuclear  
Safety & Regulatory Affairs  
317 Baronne Street  
P.O. Box 60340  
New Orleans, Louisiana 70160

Louisiana Power & Light Company  
ATTN: L. W. Laughlin, Site  
Licensing Support Supervisor  
P.O. Box B  
Killona, Louisiana 70066

Louisiana Power & Light Company  
ATTN: G. M. Davis, Manager, Events  
Analysis Reporting & Response  
P.O. Box B  
Killona, Louisiana 70066

Middle South Services  
ATTN: Mr. R. T. Lally  
P.O. Box 61000  
New Orleans, Louisiana 70161

Louisiana Radiation Control Program Director

bcc to DMB (IE01)

bcc distrib. by RIV:

RRI

Section Chief (DRP/A)

RPB-DRSS

Project Engineer (DRP/A)

RIV File

D. Wigginton, NRR Project Manager (MS: 13-D-18)

R. D. Martin, RA

DRP

MIS System

RSTS Operator

DRS

Lisa Shea, RM/ALF



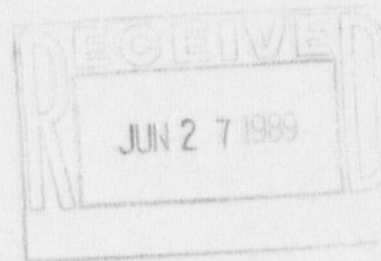
**LOUISIANA** / 317 BARRONNE STREET • P. O. BOX 60340  
**POWER & LIGHT** NEW ORLEANS, LOUISIANA 70160 • (504) 595-3100

June 15, 1989

W3P89-3056  
A4.05  
QA

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  
NRC Inspection Report 89-08

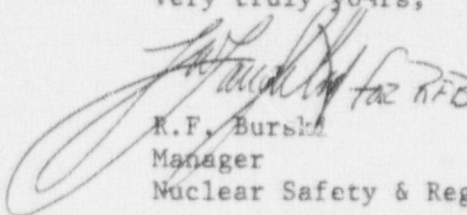


Gentlemen:

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

If you have any questions concerning this response, please contact T.J. Gaudet at (504) 454-3325.

Very truly yours,



R.F. Bursick  
Manager  
Nuclear Safety & Regulatory Affairs

RFB:TJG:ssf

Attachment

cc: 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

IC-89-234

~~8906230008~~ GAP

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ATTACHMENT 1

LP&L Response to the Violation Identified in Appendix A  
of Inspection Report 89-08

VIOLATION NO. 8908-01

Failure to Follow Procedures

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.

Contrary to the above, below are three examples of where the licensee failed to follow established procedures:

1. Paragraph 4.7.6 of Procedure MD-1-021, Revision 2, "M&TE (Measuring and Test Equipment) Accountability," prohibits use of radiologically controlled test gauges on noncontaminated systems.

Contrary to the above, on March 6, 1989, a test gauge labeled "Caution Radioactive Material" was connected to Essential Chiller B, a noncontaminated system.

2. Paragraph 4.2.1 of Procedure MM-6-011, Revision 3, "General Torquing and Detensioning," requires the mechanic to refer to Attachment 10.2 of the same procedure when using torque wrench adapters.

Contrary to the above, during performance of Work Authorization 01029819, the maintenance mechanic checking torque on Dry Cooling Tower Fan 12B hub bolts, and using a torque wrench adapter, failed to utilize Attachment 10.2, nor did he have it available at the job site.

3. Paragraph 8.2.5 of Procedure ME-4-371, Revision 4, "Maintenance Procedure Emergency Feedwater Pump Motor," requires inspection for loose or missing nuts, bolts, or other hardware following component maintenance.

Contrary to the above, after observing what appeared to be an inadequately performed inspection by the licensee's technician, the NRC inspector found three missing fasteners on a motor cover plate which should have been found following maintenance on the motor.

This is a Severity Level IV violation.

RESPONSE

(1) Reason For The Violation

The root cause for example one cited in the violation was an inadequate procedure, the basis of which is provided below. LP&L denies that examples two and three are violations of failing to follow procedures. A discussion of the basis for denial is provided on pages 3 and 4 for example two and 4 and 5 for example three.

Example 1

The guidance provided in Procedure MD-1-021 was not detailed enough to ensure that Mechanical Maintenance personnel who are responsible for using M&TE in a Radiation Controlled Area (RCA) are familiar with 1) the use of M&TE on a noncontaminated system located within the RCA and 2) which plant systems are contaminated versus those that are not contaminated. A contributing cause to this deficiency was inadequate training of Mechanical Maintenance personnel on the Health Physics' Clean Tagging Program.

The purpose of MD-1-021 is to provide guidance for the inventory control and issuance of plant M&TE. Section 4.7 of MD-1-021 (Revision 2) describes the responsibilities of the M&TE users. Paragraph 4.7.6 states that RCA M&TE is to be used on contaminated plant systems only and non-RCA M&TE is to be used on noncontaminated systems. Paragraph 4.7.7 states that non-RCA M&TE being used in the RCA on noncontaminated systems is tagged with a clean system equipment tag in accordance with Letter No. W3H86-0052 (which describes the Health Physics Clean Tagging Program) and as directed by Health Physics. When requesting the M&TE, the user completes the M&TE Record of Accountability Form (Attachment 6.4 of the MD-1-021). Indication of whether or not the M&TE is to be used in a RCA must be provided on this form. However, the procedure lacks a necessary step to clarify the usage of M&TE on a noncontaminated system located within the RCA. Additionally, the M&TE Record of Accountability Form does not provide space to log whether the M&TE is to be used on a contaminated or noncontaminated system.

Consequently, during a repair of the low pressure economizer float on Essential Chiller "B" under Work Authorization No. 01033378, a contaminated gauge was installed on the noncontaminated Essential Chiller "B" system. The responsible Mechanical Maintenance personnel were unaware that the Essential Chiller is noncontaminated and were unfamiliar with the Clean Tagging Program.

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

Example 1

On 04/14/89 a Radiological Deficiency Report (RDR No. 89-09) was generated to document the deficiency and to implement the necessary corrective actions.

Training on the Clean Tagging Program was provided to Mechanical Maintenance personnel on 06/06/89.

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

Example 1

MD-1-021 will be revised to ensure that guidance on the use of M&TE in the RCA on a noncontaminated system is provided. Additionally, Attachment 6.4 will be revised to provide space to indicate whether or not the M&TE will be used on a contaminated system.

(4) Date When Full Compliance Will Be Achieved

The above noted procedure revision will be implemented by August 15, 1989, at which time LP&L will be in full compliance.

BASIS FOR DENYING EXAMPLE TWO OF THE VIOLATION

LP&L denies that Paragraph 4.2.1 of procedure MM-6-011 was violated. The following information substantiates this position.

One of the purposes of MM-6-011 is to provide instructions for use of manual and hydraulic torque wrenches, adapters and torque multipliers. Section 4.2 of MM-6-011 provides a list of procedural limitations. Paragraph 4.2.1 states that if the final torque value is outside the range of manual torque wrenches, accessibility is limited, or other reasons prevent the use of manual torque wrenches without adapters or multipliers, then refer to Attachment 10.2 (Use of Torque Wrenches and Accessories) and Attachment 10.3 (Use of Hydraulic Torque Wrenches) to determine the best torquing method.

Plant Maintenance Procedure MD-1-014, "Conduct of Maintenance" outlines the administrative requirements for performing maintenance activities and instructs personnel in the conduct and philosophy of maintenance at Waterford 3. Section 5.3 of MD-1-014 describes the control and use of procedures, instructions and drawings. Paragraph 5.3.11 specifically states the following:

Work plans associated with maintenance and modification activities will determine if procedure use in the field is required. Planning personnel will ensure usability and correctness of procedures when planning maintenance activities. UNT-04-009 provides the requirements for verification and use of "in-hand" procedures.

The "in-hand" use of procedures is actually described in Section 5.10 of Plant Administrative Procedure UNT-04-009, "Control, Distribution, Handling and Use of Plant Procedures." Paragraph 5.10.2 specifically states that when "in-hand" procedures are not required, the user shall review the procedure prior to performance of the activity to assure the content has not been changed by a recent revision.

When performing preventive maintenance work on Component Cooling Water Dry Cooling Tower Fan 12B under Work Authorization No. 01029819, a torque wrench adapter was needed to check the torque of the fan hub bolts. The mechanic, who was familiar with the scope of work involved, knew that the required torque value had been entered into the work package, had preplanned the work and already made use of Attachment 10.2 prior to leaving for the job site. Consequently, as allowed by the above cited sections of MD-1-014 and UNT-04-009, he did not bring a copy of the procedure with him to perform the work. As substantiated on page four of the Inspection Report, the torque applied was verified to be within acceptable limits.

LP&L, however, acknowledges that it would be a better practice to have documentation available to support the mechanic's use of Attachment 10.2 of MM-06-011 prior to his leaving for the job site. Consequently, MM-06-011 will be enhanced to ensure that calculations that are performed through the use of Attachment 10.2 are documented prior to their application. (Note: The procedure will be revised by August 15, 1989.)

In light of the information provided above, LP&L believes that Paragraph 4.2.1 of MM-06-011 was adequately performed and requests that this cited example be reevaluated.

#### BASIS FOR DENYING EXAMPLE THREE OF THE VIOLATION

LP&L denies that Paragraph 8.2.5 of ME-4-371 was violated. The following information substantiates this position.

The purpose of ME-4-371 is to provide specific instructions for the periodic maintenance and functional testing of the Emergency Feedwater (EFW) Pump Motor. Section 4.2 of ME-4-371 lists the procedure limitations. Paragraph 4.2.1 specifically states the following:

The sections of this procedure may be performed individually or in any sequence. The steps within each section shall be performed in sequential order.

On March 27, 1989, two associated tasks were being performed. Functional testing of EFW Pump Motor A in accordance with ME-4-371 was being performed under Work Authorization No. 01033105 and sampling and testing of the EFW Pump Motor A bearing lube oil was being performed under Work Authorization (WA) No. 01033227. At the start of the job each step contained in Section 8.1 of ME-4-371 (Preparation) was performed in sequence. The steps of Section 8.1 requiring verification signoffs on the Emergency Feedwater Pump Motor Record Of Performance (Attachment 10.1 of ME-4-371) were signed off accordingly. Because the location of performing Section 8.1 of the procedure was the same as that required by Section 8.3 (+21 level of the



Reactor Auxiliary Building (RAB)) and due to the allowance contained in Paragraph 4.2.1 of ME-4-371, each step in Section 8.3 (Insulation Resistance And Continuity Test) was logically performed next in their proper sequence. Again, those steps requiring verification signoffs on Attachment 10.1 of ME-4-371 were consequently signed off.

Upon completion of the work that had to be performed on the +21 level of the RAB, the responsible electrical maintenance technicians proceeded to the -35 level of the RAB where the EFW Pump Motor is located. Upon arriving at the -35 of the RAB, two tasks were required. The first task was to complete the six steps contained in Section 8.2 of the procedure (Inspection and Cleaning). After completing the first four steps (8.2.1 through 8.2.4), the technicians inspected for loose or missing nuts, bolts or other hardware as required by Step 8.2.5. It was then noted by the technicians that three fasteners were missing. The last step of Section 8.2 (8.2.6) states:

Continue procedure or, if no further maintenance or testing is to be performed, then proceed to Section 8.4, Functional Testing, to continue procedure.

At this point, the second task involving the sampling and testing of the EFW Pump Motor A bearing lube oil under WA 01033227 was undertaken. After completing this task and prior to the start of Section 8.4, one of the technicians left the area and proceeded to the Service Building to obtain three fasteners. The technician then returned to the -35 level of the RAB and replaced the missing fasteners with the ones he had obtained. In accordance with Step 8.2.6, the responsible technicians then proceeded with performing and signing off the steps contained in Sections 8.4 (Functional Testing) and 8.5 (Restoration) of the procedure.

Based on the above information, LP&L believes that Paragraph 8.2.5 of ME-4-371 was not violated. LP&L, however, acknowledges that Step 8.2.5 should be listed as a signoff on the Emergency Feedwater Pump Motor Record of Performance to document completion of the step. Consequently, Attachment 10.1 of ME-4-371 will be revised to include this step as a required signoff. (Note: The procedure will be revised by August 15, 1989.)

Therefore, LP&L requests that this cited example also be reevaluated.