



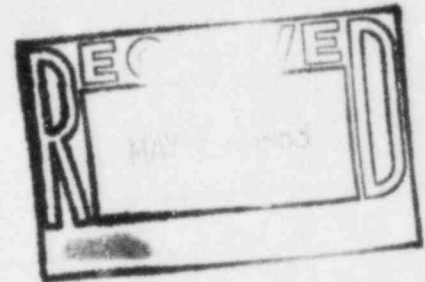
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April 29, 1983

L. V. MAURIN  
Vice President Nuclear Operations

W3183-0147  
Q-3-A35.02.01



Mr. G. L. Madsen, Chief,  
Reactor Projects Branch, Region IV  
U.S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76012

SUBJECT: Waterford SES Unit 3  
USNRC Inspection Report 50-382/83-09

Dear Mr. Madsen:

The following information regarding the violations cited by the USNRC Inspectors in USNRC Inspection Report No. 50-382/83-09 dated March 31, 1983, is hereby submitted:

1. Failure to Maintain Documentation for Installation of Safety-Related Electrical Equipment

Criterion XVII of 10 CFR 50, Appendix B, requires that sufficient records be maintained to furnish evidence of activities and shall be identifiable and retrievable.

- a. Contrary to the above, Ebasco Services, Inc., could not produce the inspection records for the installation of the motor for Control Room Supply Fan 3BSB. This safety-related motor was properly installed and inspection records for Fan 3BSB and associated air handling unit AH-12 were adequate.
- b. Contrary to the above, Fischbach & Moore could not produce the inspection records for the mounting of Diesel Generator Control and Relay Panel 3B-S. This panel was properly installed and the inspection records for the other panels associated with the 3B diesel generator were adequate.

This is a Severity Level V Violation (Supplement (II.E) [sic]  
(382/8309-01).

The following response is submitted:

FINDING 1.a

Corrective Action Taken and Results Achieved:

Nonconformance Report W3-5761 was written to address the finding. The NCR has an approved resolution to verify the fan motor installation and provide the necessary documentation. Installation verification was accomplished by LP&L via CIWAs 834546 and 828000. The NCR is presently being routed for verification of corrective action which will allow closure of the Nonconformance Report.

Action Taken To Preclude Recurrence:

Ebasco has established a Force Account Quality Control organization with responsibility for inspection of safety-related electrical activities to assure conformance with approved procedures.

Date When Corrective Action Will be Achieved:

Corrective Actions necessary to close NCR W3-5761 will be completed by May 15, 1983.

FINDING 1.b

Corrective Action Taken and Results Achieved:

Fischbach & Moore (F&M) wrote Nonconformance Report W3-971 (Ebasco NCR W3-5577) on January 26, 1983 to address the problem of incomplete installation documentation. The approved resolution for the NCR directs F&M to verify the mounting and provide the necessary documentation. CIWA 834830 was issued for F&M to proceed with the required work to close the NCR. F&M reviewed documentation for the other diesel generator to ensure that this was not a generic problem.

Action Taken to Preclude Recurrence:

Ebasco Force Account will assume responsibility for F&M field activities as of mid-May 1983.

Date When Full Compliance Will be Achieved:

F&M will complete work associated with the referenced NCR by May 13, 1983.

2. Failure to Follow Procedures for Updating Red-Line Drawings for Safety-Related Instrumentation

Criterion V of 10 CFR 50, Appendix B, requires that activities affecting safety be accomplished in accordance with instructions, procedures, and drawings.

Mercury Procedure SP 677, Revision 5, "Procedure for Red-Lining Drawings," paragraph 6.1.5.1 requires that changes reflected in the red-lined drawing be incorporated in a new revision within 90 days of the first red-line and submitted to Ebasco Services, Inc. for approval.

Contrary to the above, during the period of February 8-10, 1983, the NRC inspector identified the following three Mercury Company drawings with red-line drawings that had gone considerably more than 90 days without a new revision incorporating the changes.

<u>Drawing Number</u>	<u>Red-Line (RL) Dates</u>
853-T-005A, Revision 3	RL-1 dated February 5, 1982
853-T-005A, Revision 3	RL-1 through 7 dated February 15, 1982 through March 22, 1982
853-T-008A, Revision 2	RL's dated February 6, 1982, through April 15, 1982

This is a Severity Level V Violation. (Supplement II.E) (382/8309-02)

The following response is submitted:

Corrective Actions Taken and Results Achieved:

The problems identified with the above drawings have been corrected and Red-Lined changes have been incorporated into the appropriate drawing revisions.

Corrective Action Taken to Preclude Recurrence:

Personnel involved with the update of drawings to incorporate red-lined as built were instructed in the use of Red-Line Drawing Procedure SP-667 Rev. 5. This training was completed on February 25, 1983.

Date When Full Compliance Will Be Achieved:

Personnel training was completed on February 25, 1983 and drawing corrective actions were completed and verified as of March 25, 1983.

Mr. G. L. Madsen

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Should you have any questions or need further information on this matter please do not hesitate to contact me.

Very truly yours,

*L. V. Maurin*

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*by 792*

LVM/WAC/pjl

cc: E. L. Blake, W. M. Stevenson, J. Wilson (USNRC)