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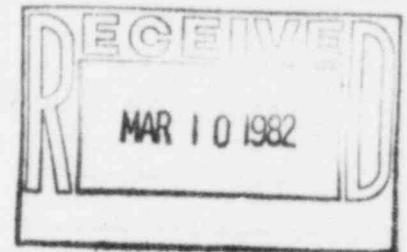
March 5, 1982

G. D. McLENDON
Senior Vice President

W3K-82-0138
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/Rpt. 81-30



Dear Mr. Madsen:

The following information regarding the violations cited by the USNRC Inspectors in IE Inspection Report No. 50-382/Rpt. 81-30 dated February 1, 1982, is herewith submitted:

A. Care and Maintenance of Safety-Related Equipment

Criterion V of 10CFR50, Appendix B, states that activities affecting quality shall be prescribed by instructions, procedures or drawings of a type appropriate to the circumstances and that these activities shall be accomplished in accordance with these instructions, procedures or drawings.

Section 6.3.1.1 of Tompkins-Beckwith Procedure TBP-29, "Piping System Cleanliness Procedure," requires that during receipt, transportation, handling, and installation, openings and pipe ends shall be sealed at all times except when they must be unsealed to carry out necessary operations.

Contrary to the above, on December 3, 1981, the NRC inspectors observed the following:

- a. Component Cooling Water Pipe 3CC4-56A2-1 had not been sealed after being disconnected from Reactor Coolant Pump 2A. The corresponding pipe ends on the Reactor Coolant Pump 2A had also not been sealed.
- b. The openings on Pressurizer Spray Pipe 1RC3-13B, which had not been completed were not sealed on the +46-foot level in the pressurizer room.

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This is a Severity Level V Violation.

The following information is submitted:

a. Corrective Action Taken and The Results Achieved:

The Component Cooling Water Pipe 3CC4-56A2-1 and the corresponding pipe ends of the Reactor Coolant Pump 2A has been properly sealed as per requirements.

Corrective Action Taken to Preclude Repetition:

Piping contractor personnel have been reinstructed on the requirements of the Care and Maintenance Instruction program.

Date When Full Corrective Action Will Be Achieved:

Activity on specific items are completed. The CMI program will continue to be an ongoing action.

b. Corrective Action Taken and Results Achieved:

The openings on the Pressurizer Spray Pipe 1RC3-13B have been sealed as per requirements.

Corrective Action Taken to Preclude Repetition:

Piping contractor personnel have been reinstructed on the requirements of the CMI program.

Date When Full Corrective Action Will Be Achieved:

Activity on specific items are completed. The CMI program will continue to be an ongoing action.

B. Care and Maintenance of Safety-Related Equipment

Criterion V of 10CFR50, Appendix B, states that activities affecting quality shall be prescribed by instructions, procedures or drawings of a type appropriate to the circumstances and that these activities shall be accomplished in accordance with these instructions, procedures or drawings.

Ebasco Care and Maintenance Instruction #31 R7 requires that a dry nitrogen blanket or purge be maintained on the pressurizer. Ebasco Care and Maintenance Instruction #32 R7 requires that a dry nitrogen purge be established on the secondary side of the steam generators after the main steam and feedwater piping has been connected to the secondary side nozzles.

Contrary to the above, on November 24, 1981, the NRC inspectors observed the following:

- a. The pressurizer had neither a nitrogen blanket or purge established.
- b. The steam generators did not have a nitrogen purge established after the main steam and feedwater piping was connected to the secondary side nozzles.

This is a Severity Level V Violation.

The following information is submitted:

Corrective Action Taken and the Results Achieved:

- a. CMI #31 R7 has been revised to delete the N₂ requirement during In-place storage. CMI #31 R8 has been issued by Document Control on February 19, 1982.
- b. CMI #32 R7 has been revised to delete the N₂ requirement during In-Place storage (primary and secondary sides)². The new issue is CMI #32 R8, distributed by Document Control on December 16, 1981.

NOTE: Combustion Engineering concurs in writing with these changes in storage requirements.

Corrective Action Taken to Preclude Repetition:

The Equipment Maintenance Department monitors have been instructed to alert the Testing Supervisor of conditions that make it impractical or impossible to conform to CMI requirements. The condition will then be investigated and the CMI revised, if necessary.

Date When Full corrective Action Will Be Achieved:

CMI #31 R8 has been issued and is being complied with. CMI #32 R8 has been issued and is being complied with. No further action is required.

C. Temporary Modifications

Start-up administrative procedure SAP-10, "Temporary System Modification", in section 4.4.1.1 requires that electrical jumpers, bypasses, and lifted electrical leads be documented as temporary modifications if the modification is to be left in place beyond a single shift.

Contrary to the above, on November 11, 1981, the NRC inspectors observed the following where an electrical jumper, bypass, and lifted electric leads had not been identified by a temporary modification tag:

- a. A temporary electric receptacle had been connected to Power Distribution Panel 362-SAB in 480V MCC 3AB 311-S.
- b. Cable 3256X-SAB leads had been lifted in Power Distribution Panel 3AB-DC-S and a jumper from a temporary panel connected to the terminals from which the leads had been lifted.

In each case stated above, the modification had not been returned to the original condition at the end of the shift.

Mr. G. L. Madsen, Chief
Reactor Projects Branch, Region IV

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This is a Severity Level IV Violation. (Supplement II.D.)

a. Corrective Action Taken and Results Achieved:

The temporary electric receptacle attached to Power Distribution Panel 362-SAB in 480V MCC 3AB-311S was removed and panel returned to normal configuration.

Corrective Action Taken to Preclude Repetition:

Start-up Engineer has been reinstructed in the requirements of SAP-10, "Temporary System Modifications".

Date When Full Corrective Action Will Be Achieved:

The removal of receptacle and the reinstruction of the Start-up Engineer has been completed. No further action is required.

b. Corrective Action Taken and Results Achieved:

The jumper from the temporary panel to the terminals in Power Distribution Panel 3AB-DC-S has been removed and Cable 33256X-SAB has been reterminated in accordance with procedure.

Corrective Action Taken to Preclude Repetition:

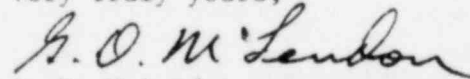
Start-up Engineer has been reinstructed in the requirements of SAP-10, "Temporary System Modifications".

Date When Full Corrective Action Will Be Achieved:

The jumper has been removed and the permanent cable reterminated. The Start-up Engineer has been reinstructed. No further action is required.

If you have any questions concerning this response, please advise.

Very truly yours,



G. D. McLendon
Senior Vice President

GDMcL:LLB:ncd

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

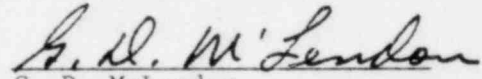
In the Matter of

Louisiana Power & Light Company
Waterford 3 Steam Electric Station

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)
) Docket No. 50-382
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AFFIDAVIT

G. D. McLendon being duly sworn, hereby deposes and says that he is Senior Vice President of Louisiana Power & Light Company; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached response (W3K82-0138) to the Notice of Violation identified in NRC Inspection Report 81-30; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.


G. D. McLendon
Senior Vice President

STATE OF LOUISIANA)
) ss
PARISH OF ORLEANS)

Subscribed and sworn to before me, a Notary Public in and for the Parish and State above named this 5th day of MARCH, 1982.


Notary Public

My Commission expires AT DEATH