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December 20, 1983

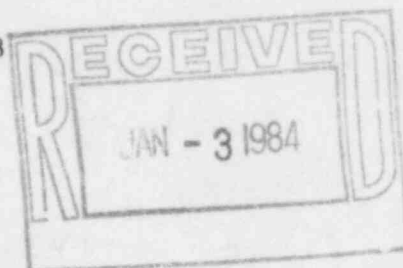
W3K83-2016
Q-3-A35.07.71

Mr. John T. Collins
Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012

REFERENCE: LP&L letter W3K83-1791 dated November 18, 1983

Dear Mr. Collins:

SUBJECT: Waterford SES Unit No. 3
Docket No. 50-382
Significant Construction Deficiency No. 71
"Inadequate Review of CIWA's for Reportability"
Final Report



In accordance with 10CFR50.55(e), we are hereby providing two copies of the Final Report for Significant Construction Deficiency No. 71, "Inadequate Review of CIWA's for Reportability".

If you have any questions, please advise.

Very truly yours,

T. F. Gerrets
Quality Assurance Manager

TFG:CNH:VBR

Attachment

cc: Director
Office of Inspection & Enforcement
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555
(15 copies)

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cc: Director
Office of Management
Information and Program Control
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. E. L. Blake
Shaw, Pittman, Potts, & Trowbridge
1800 M Street, N.W.
Washington, D.C. 20036

Mr. W. M. Stevenson
Monroe & Lemann
1424 Whitney Building
New Orleans, Louisiana 70130

FINAL REPORT OF
SIGNIFICANT CONSTRUCTION DEFICIENCY NO. 71
"INADEQUATE REVIEW OF CIWA's FOR REPORTABILITY"

INTRODUCTION

This report is submitted pursuant to 10CFR50.55(e). It describes a failure to properly review Condition Identification and Work Authorization (CIWA) forms for reportability. To the best of our knowledge, this problem has not been identified to the NRC pursuant to 10CFR21.

DESCRIPTION OF DEFICIENCY

The CIWA form is being used for identification, documentation, evaluation, and correction of conditions discovered at Waterford 3. CIWAs are routed through Ebasco Startup, Ebasco ESSE, or the LP&L Work Group for disposition and corrective action. CIWAs routed to Ebasco Startup are evaluated for reportability per the Ebasco N-23 procedure. It has been discovered, however, that CIWAs routed to ESSE and the LP&L Work Group (since June, 1981) are not being formally evaluated for reportability.

SAFETY IMPLICATION

Since the review of CIWAs was not properly performed, it is possible that the NRC has not been notified of some significant construction deficiencies.

CORRECTIVE ACTION

To correct this condition, the following action was taken by LP&L. The Quality Assurance (QA) group was assigned the responsibility of performing an initial screening of CIWAs for reportability in accordance with QP 19.3, "CIWA Reportability Screening". CIWAs which could be reportable were transmitted to the Onsite Licensing section for the final reportability determination in accordance with NAP-117, "Identification, Evaluation, and Reporting of 10CFR50.55(e) Deficiencies".

The screening by QA was performed for all CIWAs (9550) directed to Ebasco ESSE (historical), CIWAs written from June, 1981 to present that were worked by the LP&L Work Group (historical), and those which were being generated on a day to day basis (ongoing). A listing of all CIWAs was reviewed to determine which CIWAs required review. Those requiring review were logged to document the review and screening determination.

The screening and review for reportability of historical CIWAs identified by the original SCD Report has been completed. It was determined that several deficiencies identified on CIWAs were reportable, however, these deficiencies had been previously reported to the NRC and were not dependent on this review. It can therefore be concluded that although the CIWAs did not undergo a formal review process for 10CFR50.55(e) reportability, significant deficiencies were being identified by other means and were being reported to the NRC when discovered.

LONG TERM CORRECTIVE ACTION

The mechanism by which CIWAs will be reviewed for reportability on a permanent basis consists of copies of CIWAs being screened for reportability, and, if determined to be potentially reportable a formal evaluation is made and the deficiency reported if within the guidelines of 10CFR50.55(e). The guidelines of 10CFR50.55(e) and 10CFR21 have been included in QA procedures QP 15.2 "Reportability Screening of Documents Identifying Conditions Adverse to Quality" and QP 15.3 "Evaluation and Reporting of 10CFR50.55(e) Deficiencies and Possible 10CFR21 Defects" to facilitate these reviews.

This is submitted as a Final Report.