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April 10, 1984

W3P84-1005
3-A1.01.04
3-H1

Director of Nuclear Reactor Regulation
Attention: Mr. G.W. Knighton
Licensing Branch No. 3
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: Waterford SES Unit 3
Docket No. 50-382
Detailed Control Room Design Review (DCRDR)

REFERENCE: (1) W3T82-0491 dated December 22, 1982
(2) W3P83-1194 dated April 15, 1983

Dear Sir:

By Reference (1) LP&L documented the disposition of all Human Engineering Discrepancies (HEDs) identified during the DCRDR at Waterford 3. That letter was the culmination of an extensive LP&L DCRDR effort supplemented by the NRC's audit in May, 1982, and included all agreements negotiated with the NRC (HFEB) at a meeting on November 4, 1982.

Subsequently, Supplement 1 to NUREG 0737 was issued clarifying the DCRDR requirements. In the Reference (2) response to Supplement 1 LP&L maintained that the DCRDR was complete and that HED resolution was proceeding satisfactorily. However in Supplement 5 to the Waterford SER the NRC required that, following licensing, a DCRDR be performed or the necessary documentation be provided to demonstrate completion.

Because LP&L completed the majority of DCRDR work prior to issuance of Supplement 1, we anticipate submittal of the DCRDR Program Plan and Summary Report in one package, currently scheduled for January 31, 1985. This length of time is necessary for us to reevaluate our position on the function and task analysis requirements of Supplement 1. It is our understanding that the NRC has found no industry submittal acceptable in this area, perhaps indicating the need for generic resolution.

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