



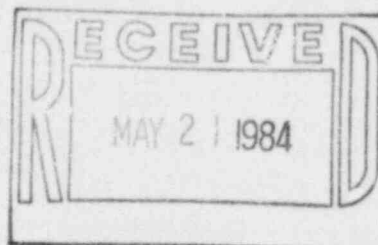
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May 11, 1984

W3K84-1139  
Q-3-A35.07.108

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



REFERENCE: Telecon T. Heatherly (LP&L) and Eric Johnson (NRC Region IV)  
on April 12, 1984

Dear Mr. Collins:

SUBJECT: Waterford SES Unit No. 3  
Docket No. 50-382  
Significant Construction Deficiency No. 108  
"Potential Failure To Comply With FSAR Safe Shutdown Commitment"  
First Interim Report

In accordance with the requirements of 10CFR50.55(e), we are hereby providing two copies of the Interim Report of Significant Construction Deficiency No. 108, "Potential Failure To Comply With FSAR Safe Shutdown Commitment". This item was previously reported as PRD No. 165.

If you have any questions, please advise.

Very truly yours,

T. F. Gerrets  
Corporate Quality Assurance Manager

TFG:CNH:SSTG

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

Director  
Office of Management  
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U. S. Nuclear Regulatory Commission  
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Mr. John T. Collins

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INTERIM REPORT OF  
SIGNIFICANT CONSTRUCTION DEFICIENCY NO. 108

"POTENTIAL FAILURE TO COMPLY WITH FSAR SAFE SHUTDOWN COMMITMENT"

INTRODUCTION

This report is submitted pursuant to 10CFR50.55e. It describes a deficiency in the implementation of the 10CFR50 Appendix R FSAR Safe Shutdown Analysis (SSA). The description that follows only addresses those deficiencies in the SSA which reflect a failure to meet FSAR commitments. This problem is considered reportable under the requirements of 10CFR50.55e and has not been identified to the Nuclear Regulatory Commission pursuant to 10CFR21. Findings stemming from the NRC Fire Protection Audit of April 9-13, 1984, which reflect the NRC's nonconcurrence with certain FSAR SSA commitments and assumptions are not included. These will be handled separately as part of the overall Audit Corrective Action Plan.

DESCRIPTION OF PROBLEM

In the process of developing a procedure for shutdown of the plant from the remote shutdown panel (LCP-43) for a cable vault fire, it was determined that the FSAR commitments to protect all essential cables from the effects of such a fire were not fully met. Specifically, Section III of Appendix 9.5A commits to ensuring that at least one train of equipment deemed essential for hot standby would be available either in the control room or at LCP-43 in the event of a cable vault fire. Contrary to this, it has been determined that RCS pressure indication could be lost both in the control room and at LCP-43 in the event of a cable vault fire. In addition, neither satisfactory access, i.e. handwheel access and emergency lighting, to the Atmosphere Dump Valve (ADV) handwheels for local manual operation nor controls for remote operation from LCP-43 could be available after a total cable vault fire, a highly unlikely occurrence in view of the dedicated and area sprinkler systems provided in the vault. These components were however, established as necessary for hot standby in the FSAR (See Section II of Appendix 9.5A).

SAFETY IMPLICATIONS

If left uncorrected, a fire in the cable vault could cause loss of direct RCS pressure indication at LCP-43 and control room, and complicate the operator's ability to remove reactor decay heat in a controlled manner by use of the ADV's.

CORRECTIVE ACTION

RCS pressure indication cabling shall be rerouted to ensure its availability in the event of a cable vault fire. Access to the ADV handwheels shall be upgraded to facilitate local manual operation. In addition, emergency lighting will be provided for associated areas.

The RCS pressure indication cabling will be rerouted prior to fuel load. Access to the ADV's will be upgraded prior to initial criticality or June 30, 1984, whichever is earlier.

A final report will be submitted on or before June 30, 1984.