

APR 27 1984



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142 DELARONDE STREET • P.O. BOX 8008
NEW ORLEANS, LOUISIANA 70174-8008 • (504) 366-2345

April 26, 1984

ROTH S. LEDDICK
Senior Vice President
Nuclear Operations

W3P84-1035
3-A19.09.04.02

Mr. Zack T. Pate
President
Institute of Nuclear Power Operations
1100 Circle 75 Parkway
Suite 1500
Atlanta, Georgia 30339

Dear Mr. Pate:

This letter forwards an updated status of several of Louisiana Power & Light Company's responses to recommendations developed by INPO during the corporate assistance visit conducted from December 12 through December 16, 1983.

In our previous letter to you on this subject dated February 17, 1984, we stated that we would periodically update the status of each open item until its closure.

The Attachment to this letter will provide you with an updated status on seven of the seventeen open recommendations remaining.

Should you have any questions, please contact myself at 504-464-3307 or F. J. Drummond at 504-363-8780.

Yours very truly,

R. S. Leddick

RSL/EJS/jal

Attachment

cc: J. M. Cain, F. J. Drummond, T. F. Gerrets, N. S. Carns, D. E. Dobson,
R. P. Barkhurst, Z. A. Sabri, C. A. Ponder, W. C. Welton,
Central Records, Nuclear Records (2)

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MANAGEMENT INVOLVEMENT AND COMMITMENT

Recommendation (1.2A-2) Continue development of the Availability Improvement Program which provides for monitoring, trending, and analysis of selected plant data. INPO's Good Practice OA-102, "Performance Monitoring," could be of assistance in this effort. This program should be designed to permit senior managers to readily focus on potential problem areas and assess progress toward goals. Interim reporting in areas pertaining to licensing matters, radiological protection, and items important to safety such as reactor protection and emergency safeguards systems actuations, should be in place by fuel loading.

LP&L Response:

An Executive Directive was approved March 1, 1984 outlining the objectives and philosophy of the Availability Improvement Program (AIP) for Waterford 3. The initial AIP scope/study plan has been developed and is under review at present. This plan defines tasks, methodology, resources, and information needed to perform the tasks; and includes a two year timetable with milestones for projected implementation. Approval of the AIP scope/study plan is scheduled for late April 1984.

The Senior Vice-President of Nuclear Operations via his letter of January 18, 1984, issued an Executive Directive detailing Louisiana Power and Light Company's commitment to develop and implement the "Performance Monitoring-Management Information" program for Waterford 3 by March, 1984 in accordance with INPO's Good Practice OA-102. The first Monthly Management Information Report for Waterford 3 on Performance Monitoring was issued on March 19, 1984. The report contained 8 performance indicators on which the information was readily available. It is intended to progressively expand the contents of the Monthly Management Report as operational data from Waterford 3 becomes available. The responsibility to prepare and issue the Monthly Management Report for Waterford 3 has been assigned to the Nuclear Services Manager, a Senior Nuclear Manager at Waterford 3. The preparation of the Monthly Management Report for Waterford 3 is being proceduralized via a Nuclear Operation Administration Procedure, which has been drafted and is awaiting formal approval by the Senior Nuclear Managers. The April, 1984 Monthly Management Report was issued on April 11, 1984 and contained information on 13 performance indicators.

CONDUCT OF OPERATIONS

Recommendation (2.1A-1) Review administrative procedures and revise as necessary to provide adequate guidance and authority for personnel to perform assigned functions. Procedures should provide details sufficient for job task and staffing requirements within each department and should specify interdepartmental involvement where applicable.

LP&L Response:

As described in the original response, a comprehensive review and upgrading of Nuclear Operations Department corporate staff administrative procedures is underway. The revisions are bringing the procedures to a condition that reflects the current organizational structure, and should assist all staff members by providing a clear definition of individual responsibilities. In conjunction with this procedure effort, Executive Directives are used to identify interdepartmental responsibilities for monitoring specific nuclear station operations and to initiate descriptive manuals to cover broad subject areas, for example ALARA, in which the scope and departmental interface requirements are extensive.

Controlled Nuclear Services Procedure and Instruction Manuals, containing the upgraded administrative procedures and instructions have been distributed throughout the plant site and corporate offices to ensure easy access by user personnel. The previous procedures in the Administrative Procedures Manuals are recalled as the new procedures are approved.

TECHNICAL SUPPORT

Recommendation (2.3A-2) Review the Station and Project Management Modification Administrative Procedures for adequacy and to ensure effective interface, coordination, and provisions for off-normal hours communication. Recent organizational changes have not been reflected in current procedures.

LP&L Response:

The manner in which Station and Project Management Modifications are packaged, coordinated and implemented has recently been modified. Administrative procedures have been reviewed for adequacy, to assure effective interfaces and to reflect recent organizational and modification process changes. Procedure changes have been completed, approved and in the process of implementation for: Control and Assignment of

Station Modification Packages, Preparation of Station Modification Packages, Technical Verification, and Station Modification Package Update. The procedure for the Control and Processing of Staff System Deficiency List Items has completed the preliminary review cycle, the comments have been incorporated, and is in the final approval cycle.

Mechanisms are in place that allow for communications during off normal hours.

RADIOLOGICAL PROTECTION

Recommendation (2.7A-1) Expand efforts to fill vacant positions on the Corporate Radiation Control staff. Only two of the four authorized positions are currently filled. Full implementation of the corporate radiological protection program appears to be contingent on filling these vacant positions.

LP&L Response: Since January, 1984 five candidates have been interviewed and two offers were made. One of the two offers was declined and the other was accepted by Mr. Harvey Lesan who reported to work March 19, 1984. The remaining vacancy is expected to be filled May 28, 1984.

Recommendation (2.7A-2) Expedite development of radiological protection goals as required by Nuclear Operations Executive Directive ED-008 "ALARA Policy Statement" and Nuclear Administrative Procedure NAP-259 "Annual Dose Estimates/Goals and Analysis." These goals should be promulgated prior to start-up, along with associated action plans for each applicable plant department.

LP&L Response: The annual ALARA dose estimates and goals were presented to and accepted by the Waterford 3 ALARA committee on March 20, 1984. The Corporate ALARA manual has been revised and will be transmitted to the ALARA committee for comment by April 13, 1984. NSP-245 "Alara review" is currently in the final review process and should be approved by April 13, 1984.

CHEMISTRY

Recommendation (2.8A-1) Implement on-site chemistry surveillance by the corporate Chemistry/Radiochemistry Section staff in the manner currently specified by Nuclear Administrative Procedure NAP-282, "Monitoring." This procedure requires the corporate staff to

periodically observe plant chemistry activities. Although the plant is performing chemistry activities, corporate observations of these activities have not yet been started.

LP&L Response:

Per conversations with Mr. R. E. Allen of the Waterford-3 Chemistry Department, the data management program was not put into the plant computer by the March 1, 1984 target date, due to the lack of space in the computer memory. Purchasing an IBM personal computer was considered as an option, but this was ruled out and removed from the 1985 chemistry budget. The chemistry department is considering other possible alternatives. In the meanwhile, data management will be manually done and the Nuclear Support Section will review the data. NSP-271 is still in the review/approval cycle.

ASSURANCE PROGRAMS

Recommendation (2.9B-1) Develop a graduated quality program designed to maximize the operational performance of selected non-safety-related systems and equipment important to plant reliability. Activities to consider under this program should include system/equipment operation, maintenance, modification, procurement, performance monitoring, and chemistry.

LP&L Response:

The Senior Vice President - Nuclear Operations approved a complete rewrite of the Quality Assurance Manual for the operations phase of Waterford 3 on January 20, 1984. This manual is divided into two sections. Section I contains the QA program described in FSAR Section 17.2 and primarily addresses 10CFR50 Appendix B and USNRC Standard Review Plan (NUREG-6800) for the safety-related features of the plant. Section II of the manual will contain other QA policies as defined by the Senior Vice President - Nuclear Operations. Section I of the manual is complete and was issued on February 23, 1984.

At the time of the first response seven (7) QA Policies within Section II of the Quality Assurance Manual were listed as examples of those under development with a projected issue date of April 1984. Since then, six (6) others have been added.

It is anticipated that all thirteen (13) Chapters will be issued by June 1984. Other Chapters will continue to be added as the need is identified.

Listed below are the titles of the thirteen Special Scope QA Policies for Section II of the QA Manual identified at this time.

| <u>Chapter #</u> | <u>TITLE</u> |
|------------------|---|
| 1 | Fire Protection |
| 2 | Housekeeping & Cleanliness Control |
| 3 | Radiological Environmental Monitoring |
| 4 | Emergency Preparedness |
| 5 | Security |
| 6 | Rad Waste Management |
| 7 | Nuclear Material Control and Accountability |
| 8 | Indoctrination & Training |
| 9 | Reportability to NRC |
| 10 | Reliability |
| 11 | Computer Software QA |
| 12 | ALARA |
| 13 | Radiation Protection |

It should also be noted that LP&L is participating in the Utility Safety Classification Group dealing with the "Important-to-Safety" issue and the graded QA programs necessary for important to safety systems/equipment.

FEB 20 1984



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NEW ORLEANS, LOUISIANA 70174-8008 • 504-388-2345

February 17, 1984

W3P84-0357
3-A19.09.04.02

Mr. E. P. Wilkinson
President
Institute of Nuclear Power Operations
1100 Circle 75 Parkway
Suite 1500
Atlanta, Georgia 30339

Dear Mr. Wilkinson:

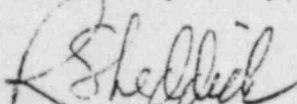
This letter forwards Louisiana Power & Light Company's responses to recommendations developed by INPO during the corporate assistance visit conducted from December 12 through December 16, 1983.

It was our intention to address each INPO recommendation by stating our position or actions required and our time table for implementation of those actions. In addition, we will be periodically updating the status of each open item until it's closure.

LP&L truly appreciated the assistance and cooperation of the INPO team which conducted the visit.

Should you have any questions, please contact myself at 504-464-3307 or F. J. Drummond at 504-363-8780.

Yours very truly,


R. S. Leddick

RSL/EJS/jal

Attachment

cc: J. M. Cain, F. J. Drummond, T. F. Gerrets, N. S. Carns, D. E. Dobson,
R. P. Barkhurst, Z. A. Sabri, C. A. Ponder, W. C. Nelson, Central Records,
Nuclear Records

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ORGANIZATIONAL STRUCTURE

PERFORMANCE OBJECTIVE: A. The corporate organization of a nuclear utility should be established in such a manner that the functions, assignments, and responsibilities of individuals are clearly defined and understood. All major aspects of the nuclear operation should be covered with emphasis on safety and reliability.

Recommendation (1.1A-1) Revise the current organization to shift the Nuclear Safety Group from Projects to Nuclear Services. This would place the Nuclear Safety Group under the manager responsible for emergency planning, licensing, regulatory compliance, and nuclear support.

LP&L Response: The Nuclear Operations Department Organization is being revised to implement this recommendation. The action required to shift the Nuclear Safety Section from Projects to Nuclear Services will be completed no later than June 1, 1984.

Recommendation (1.1A-2) Consider assigning a Waterford 3 site manager to coordinate site activities when the Senior Vice President and part of the corporate staff move off site. Many activities will remain at the site after the construction is completed; however, no one is currently scheduled to coordinate these activities with the plant staff.

LP&L Response: This recommendation has been evaluated and it is our judgement that the existing organization will function effectively, in the short term, without a Site Manager. However, after commercial operation is achieved, serious consideration will be given to assigning a Site Manager.

MANAGEMENT INVOLVEMENT AND COMMITMENT

PERFORMANCE OBJECTIVE: A. Corporate managers assigned functional responsibilities for nuclear matters should have direct involvement in significant decisions that could affect their responsibilities. Management commitment to the operation of the nuclear station(s) in a safe and proper manner should be evident from personal involvement, interest, awareness, and knowledge.

Recommendation (1.2A-1) Re-emphasize to corporate personnel their responsibility to actively monitor plant operations, identify problems, and work with plant personnel to develop corrective actions, in addition to assisting the plant in areas as requested. Ensure that plant personnel fully understand the role of corporate personnel and

work with corporate personnel to achieve desired results.

LP&L Response:

LP&L corporate managers who have functional responsibilities for nuclear matters have continuous direct involvement in decisions that affect their areas of responsibilities. Focal points of this involvement are the staff meetings conducted by the Senior Vice President - Nuclear Operations and weekly Senior Managers Meetings, attended by senior plant and corporate managers as well as key supervisory personnel from all areas of the Nuclear Operations Department. The agenda for the meetings represent a comprehensive review and monitoring of plant status.

The Nuclear Operations Department staff, including corporate and plant personnel, have been apprised of the INPO recommendation, and the need for a close cooperative effort between plant and corporate personnel in addressing problems and prescribing corrective actions, has been re-emphasized.

Increased attention has been directed toward the interaction between the plant and corporate personnel, during the upgrading of the administrative procedures. Those procedures define the interface between the plant and support services staffs, and the re-examination/revision process has assisted in clearly defining responsibilities as well as identifying areas of necessary cooperation to meet mutual goals.

Subsequent to commercial operation the make up of the corporate nuclear staff will be subject to close review with the intent of insuring all areas requiring supervision are filled with experienced, qualified staff personnel.

Recommendation (1.2A-2) Continue development of the Availability Improvement Program which provides for monitoring, trending, and analysis of selected plant data. INPO's Good Practice OA-102, "Performance Monitoring," could be of assistance in this effort. This program should be designed to permit senior managers to readily focus on potential problem areas and assess progress toward goals. Interim reporting in areas pertaining to licensing matters, radiological protection, and items important to safety such as reactor protection and emergency safeguards systems actuations, should be in place by fuel loading.

LP&L Response:

An Executive Directive has been prepared and is under review outlining the objectives and philosophy of the Availability Improvement Program (AIP) for Waterford-3. The initial AIP scope/study plan has been developed and is under review at present. This plan defines tasks, defines methodology, resources, and information needed to perform the tasks; and includes a timetable with milestones for projected implementation.

A letter from the Sr. Vice President of Nuclear Operations was distributed on January 18, 1984 detailing LP&L's commitment to INPO's Good Practice OA-102, "Performance Monitoring". A Monthly Management Report concerning performance monitoring and management information will be issued beginning in March of this year. The March, 1984 report will consist of currently available information. It is intended to progressively expand the contents of the monthly report as operational data from Waterford 3 becomes available.

CONDUCT OF OPERATIONS

PERFORMANCE OBJECTIVE: A. Certain aspects of the conduct of nuclear station operations should be monitored by corporate management. As a result of this effort, support, guidance, and assistance should be provided to the nuclear station(s) as required to ensure and enhance plant safety and reliability.

Recommendation (2.1A-1) Review administrative procedures and revise as necessary to provide adequate guidance and authority for personnel to perform assigned functions. Procedures should provide details sufficient for job task and staffing requirements within each department and should specify interdepartmental involvement where applicable.

LP&L Response:

A comprehensive review and upgrading of Nuclear Operations Department corporate staff administrative procedures has been initiated. The revisions are bringing the procedures to a condition that reflects the current organizational structure, and should assist all staff members by providing a clear definition of individual responsibilities.

In conjunction with the procedures effort Executive Directives are used to identify interdepartmental responsibilities for monitoring specific nuclear station operations. In addition, the Executive Directive system will be used to initiate descriptive manuals to cover broad subject areas,

for example ALARA, in which the scope and departmental interface requirements are extensive.

These procedures will be upgraded in sufficient time to support the operations of Waterford 3.

MAINTENANCE SUPPORT

PERFORMANCE OBJECTIVE: B. Corporate management should ensure that adequate personnel are supplied from corporate resources or contractors to provide support for the station(s).

Recommendation (2.2B-1) Clearly define the responsibility and authority for maintenance activities on systems that have been transferred from construction to the plant and have either outstanding deficiencies or require modification. The maintenance on those systems upon which start-up is dependent should be incorporated into an integrated schedule and carefully tracked to completion by corporate management.

LP&L Response: Responsibilities and authorities for maintenance and modification activities on systems that have been transferred from construction to the plant staff are defined in Plant Operating Manual Procedures. System deficiencies, required modifications, preventive maintenance, surveillance tests, and punch list items are tracked and scheduled by the Plant Planning and Scheduling group. Major requirements which have possible impact on plant fuel load and startup are tracked by the Project Planning and Scheduling group. Integrated project schedules are routinely reviewed by Corporate Management.

TECHNICAL SUPPORT

PERFORMANCE OBJECTIVE: A. The corporate engineering/technical staff should be sufficient to carry out the engineering and/or engineering review functions necessary to ensure safe and reliable nuclear plant operation.

Recommendation (2.3A-1) Expedite plans and implement actions for drawing control and drawing update programs to be used during commercial operation. It is anticipated that the current as-built drawing update program will not support the rapid rate of system turnover presently scheduled.

LP&L Response: Our program for drawing control and drawing updates to be used during commercial operation is under review. The review and appropriate corrective action is targeted for a completion by June 1, 1984. This item will be tracked as part of our completion plan checklist.

Recommendation (2.3A-2) Review the Station and Project Management Modification Administrative Procedures for adequacy and to ensure effective interface, coordination, and provisions for off-normal hours communication. Recent organizational changes have not been reflected in current procedures.

LP&L Response: The manner in which Station and Project Management Modifications are packaged, coordinated and implemented is being modified. Once the process is clearly determined, the procedures will be updated to identify interfaces and coordination consistent with the current organization. This should be accomplished by March 31, 1984.

Mechanisms are in place that allow for communications during off normal hours.

MATERIALS MANAGEMENT

PERFORMANCE OBJECTIVE: A. Corporate support of materials management of the nuclear station(s) should ensure that necessary parts and material are available when needed.

Recommendation (2.4A-1) Expedite the transfer of responsibility for rapid procurement of high priority parts and materials and the acquisition of spare parts from EBASCO to Louisiana Power & Light purchasing. Continued reliance on a contractor for assistance in these critical areas could weaken corporate control of materials management and impact nuclear station support.

LP&L Response: Louisiana Power & Light is currently responsible for acquiring the majority of spare parts being ordered and, effective January 23, 1984, LP&L assumed responsibility for purchasing a portion of the high priority parts and materials required to support Fuel Load which were previously being obtained through Ebasco. It is intended that LP&L will continue to assume increasing responsibility for all Waterford 3 related purchasing through a phased transition with primary responsibility being achieved by January, 1985. However, it is planned that Ebasco will continue to provide an option for some procurement support, particularly in the area of purchases in support of station modifications, for a considerable period of time.

TRAINING AND QUALIFICATION

PERFORMANCE OBJECTIVE: A. Senior corporate management attention and support should be given to the program of developing experienced, trained, and qualified personnel required for the operation and support of the utility's nuclear station(s).

Good Practice (2.5A-1) The following Good Practice was noted: An excellent continuing professional training program has been developed for the Nuclear Operations Quality Assurance Group. This program is intended to enhance the inspecting, interviewing, and general management skills of QA personnel and has been well received by QA personnel.

PERFORMANCE OBJECTIVE: B. The corporate manager with principal responsibility for training in nuclear matters should ensure adequate support for and coordination of station and off-site training activities.

Recommendation (2.5E-1) Develop and implement a structured training program for corporate personnel to enhance their ability to perform their assigned jobs and to train backup personnel. Examples of areas to be addressed include the following:

- a. management and leadership training for managers and supervisors
- b. plant systems training for engineers and personnel associated with modification design, licensing, safety reviews and evaluations, maintenance, chemistry, and radiation protection
- c. ANSI standards, codes, regulations, and state requirements
- d. plant and corporate procedures and policies
- e. plant operations principles

LP&L Response:

LP&L corporate nuclear personnel are actively involved in the support and direction of the construction and startup activities. LP&L Nuclear Management believes that the hands on experience gained during this phase of the startup activities is extremely valuable and should be maximized. A structured training program is now under development by the Training Evaluation and Assurance Organization. The program is based on a training needs assessment. This will assure that variation in the experience level and education of individuals are considered in structuring the needed training. The program is composed of general training, eg., GET, plant systems and specialized training, which is dependent on the job responsibility of the individual. The full implementation of this training program is scheduled after commercial operations.

- a) Louisiana Power and Light has an ongoing program in this area, the Supervisors Development Program, that has been supplemented with NRC required aberrant behavior training. Completion of this for supervisory staff has been delayed due to the start-up effort. Supervisory and management personnel will be scheduled to complete this training as soon as the start-up effort is complete.
- b) Plant Training has a program for teaching General Plant Systems that was given to a wide range of personnel. Since the program was designed to be a basic plant familiarization course, most engineers criticized it as too basic. This program will be modified to meet the needs of the above group. Full implementation of this program will be after Commercial Operations.
- c) Training has evaluated several courses available in this area. Most are designed to meet the needs of the licensing engineer and run about ten hours. This type of course will be modified to fit the needs of the groups listed in 2.5B-1b above.
- d) Training in this area will be evaluated to ascertain if current administrative methods are adequate.
- e) During late 1982 and early 1983, Training provided a course in plant operating principles, using a commercial compact simulator. Selected engineering personnel were then sent to Windsor, CT for further training on the CE full scope simulator. This program was very well received and its continuation will be investigated.

In addition to the above programs, LP&L is initiating a program of professional development including near or on-site resident credit classes. This program is designed to meet the needs of those who find it difficult to take advantage of local school offerings.

RADIOLOGICAL PROTECTION

PERFORMANCE OBJECTIVE: A. Radiological protection activities at the nuclear station(s) should be actively supported and monitored by corporate management. Corporate policy, guidance, and assistance should be provided to the stations to improve radiological protection.

Recommendation (2.7A-1) Expand efforts to fill vacant positions on the Corporate Radiation Control staff. Only two of the four authorized positions are currently filled.

Full implementation of the corporate radiological protection program appears to be contingent on filling these vacant positions.

LP&L Response:

The Nuclear Support Manager and the Radiation Control Unit Coordinator are currently actively interviewing candidates for the vacant positions. Offers are presently being made to qualified individuals and the vacancies are expected to be filled by April 1, 1984.

Recommendation (2.7A-2)

Expedite development of radiological protection goals as required by Nuclear Operations Executive Directive ED-008 "ALARA" Policy Statement" and Nuclear Administrative Procedure NAP-259 "Annual Dose Estimates/Goals and Analysis." These goals should be promulgated prior to start-up, along with associated action plans for each applicable plant department.

LP&L Response:

Mr. Pete Snell of Middle South Services has been temporarily assigned to the Radiation Control Unit to assist in the implementation of ED-008. Mr. Snell is currently revising the Corporate ALARA manual and NSP-245 "Alara Review", to conform with recent changes in the corporate organization. The annual Alara dose estimates and goals will be promulgated by March 15, 1984.

Recommendation (2.7A-3)

Expedite implementation of the on-site review and appraisal program for radioactive waste and radiological protection by the Corporate Radiation Control Group. Such appraisals have proven useful at other plants prior to start-up to identify potential radiological problems. Examples of such appraisals include the following:

- a. identifying components and valves where minor leakage could contaminate large areas of the plant
- b. determining the retention of plant personnel knowledge of radiological protection procedures and practices

Correction of problems before the plant becomes radioactive could save intensive time and cleanup costs later.

LP&L Response:

Implementation of the on-site review and appraisal program is expected to be complete sixty (60) days following complete staffing of the Radiation Control Unit (i.e., June 1, 1984).

Recommendation (2.7A-4) Implement the plant radiological protection program prior to start-up. Activities such as posting potential radiation and contamination areas, establishing access controls, implementing the dosimetry program, requiring personnel to wear the anticipated protective clothing, and implementing radiation and contamination surveys should provide early warning of problems prior to the plant becoming radioactive. Also, consider providing a brief refresher course in radiological protection for plant personnel.

LP&L Response:

LP&L Letter W3H84-0015, dated February 7, 1984 addresses the subject of implementation of the Radiation Protection Program. This letter and the enclosure, Health Physics Implementation Plan, associated with it have been attached to this document for your information.

CHEMISTRY

PERFORMANCE OBJECTIVE: A. Chemistry activities (PWR primary and secondary and BWR reactor and auxiliary systems) at the nuclear station(s) should be actively supported and monitored by corporate management. Corporate policy, guidance, and assistance should be provided to stations as needed to ensure proper chemistry control.

Recommendation (2.8A-1) Implement on-site chemistry surveillance by the corporate Chemistry/Radiochemistry Section staff in the manner currently specified by Nuclear Administrative Procedure NAP-282, "Monitoring." This procedure requires the corporate staff to periodically observe plant chemistry activities. Although the plant is performing chemistry activities, corporate observations of these activities have not yet been started.

LP&L Response:

NAP-282, "Monitoring", will be initiated after implementation of the chemistry data management program. The implementation target date is March 1, 1984. Nuclear Support Procedure, NSP-271, "Chemistry/Radiochemistry Unit Organization and Responsibilities", is now being revised to include the monitoring responsibilities of the Chemistry/Radiochemistry Unit. After issuance of NSP-271, NAP-282 will be deleted.

Recommendation (2.8A-2) Re-establish monitoring of chemistry analytical measurements by the corporate Chemistry/Radiochemistry Section staff as specified in in Nuclear Administrative Procedure NAP-282, "Monitoring." Data on chemistry analyses have not been reviewed by the corporate staff since July 1983.

LP&L Response: Please see response to Item 2.8A-1. Informal data inspections have been made at Waterford-3 for information purposes, since July, 1983.

Recommendation (2.8A-3) Improve communications between the plant and corporate staffs in chemistry matters. Examples of needed improvements include the following:

- a. The corporate Chemistry/Radiochemistry Section staff was not aware of problems the plant chemistry staff considered significant.
- b. The plant chemistry staff has not provided the corporate staff monthly chemistry data reports for the last four months. Administrative procedures require corporate staff review of these data at least monthly.
- c. There have been few requests for corporate chemistry assistance from the plant.

LP&L Response:

- a. The Nuclear Support & Licensing Manager, Nuclear Support Manager and the Chemistry/Radiochemistry Unit Coordinator have discussed the situation with the new Plant Staff Chemistry Engineer. These discussions have resulted in better understanding of the plant problems and needs for assistance. This mutual understanding will help to improve communications between the organizations.
- b. Please see response to Item 2.8A-1. The monthly chemistry logs in question had been requested before the INPO interview. These logs have now been received.
- c. Please see response to Item 2.8A-3.a.

ASSURANCE PROGRAMS

PERFORMANCE OBJECTIVE: A. Operating activities, events, trends, and results having nuclear safety significance should be assessed by independent review, audit, or analysis.

Recommendation (2.9A-1) Consolidate the review, dissemination and tracking of incoming operations, maintenance, and technical information under one group. Currently this function is accomplished by several corporate groups on site. Consolidation will enhance the ability to complete appropriate actions. Information that should be included in this effort include the following:

- a. SEE-IN program information

- b. regulatory information such as bulletins, notices, circulars, letters, regulatory guides, and 10CFR21 reports
- c. vendor information such as service information letters, technical letters and NSSS information
- d. inspection reports from code and regulatory organizations

LP&L Response:

It is planned that all incoming operations, maintenance and technical, etc., documentation be received at a control location. That location will be responsible for forwarding the documentation to the appropriate office for review, information, or action and also for logging and tracking the documentation in a computerized system. It is estimated that this will be in place the third quarter of 1984.

Recommendation (2.9A-2) Consider providing additional Combustion Engineering operational experience to the Safety Review Committee (SRC) by exchanging senior personnel within the Middle South System. For example, the Plant Manager or Assistant Plant Manager from Arkansas Nuclear One (ANO) could add experience to the Waterford 3 SRC, and the Waterford 3 Plant Manager or his Assistant Plant Manager could likewise serve on the ANO SRC.

LP&L Response:

Although the current membership of the Safety Review Committee (SRC) does provide considerable Combustion Engineering experience additional expertise in this area would of course be beneficial. Discussions have been held regarding exchanging members with Arkansas Power & Light Company. Preparations for fuel loading and associated activities preclude exchanging Plant Managers or Assistant Plant Managers at this time. The availability of appropriate personnel will continue to be reviewed towards arranging a mutually beneficial exchange.

PERFORMANCE OBJECTIVE: B. Day-to-day activities associated with the nuclear station(s) should be observed and monitored under a continuing program designed to ensure the highest quality of personnel performance, workmanship, and attention to detail. The program should be applied, in an appropriately graduated way, to the entire nuclear operation. Typically, the major part of this program is conducted by the utility's quality assurance organization.

Recommendation (2.9B-1) Develop a graduated quality program designed to

maximize the operational performance of selected non-safety-related systems and equipment important to plant reliability. Activities to consider under this program should include system/equipment operation, maintenance, modification, procurement, performance monitoring, and chemistry.

LP&L Response:

The Senior Vice President - Nuclear Operations approved a complete rewrite of the Quality Assurance Manual for the operations phase of Waterford 3 on January 20, 1984. This manual is divided into two sections. Section I contains the QA program described in FSAR Section 17.2 and primarily addresses 10CFR50 Appendix B and USNRC Standard Review Plan (NUREG-0800) for the safety-related features of the plant. Section II of the manual will contain other QA policies as defined by the Senior Vice President - Nuclear Operations. Section I of the manual is complete and should be issued by the end of February, 1984. Section II is still under development and is expected to be issued in April, 1984. Examples of "other QA policies" being developed for Section II are:

- o Fire Protection
- o Environment Monitoring
- o Emergency Preparedness
- o Security
- o Radioactive Waste Management
- o Reliability
- o Computer Programs Quality Assurance

It should also be noted that LP&L is participating in the Utility Safety Classification Group dealing with the "Important-to-Safety" issue and the graded QA programs necessary for important to safety systems/equipment.

INDUSTRIAL SAFETY

PERFORMANCE OBJECTIVE: A. Activities related to industrial safety at the nuclear station(s) should be supported and monitored by corporate management. Corporate policy, guidance, and assistance should be provided to the station(s) as needed to ensure the safety and health of each employee.

Recommendation (2.10A-1) Establish a strong corporate involvement at the site in the area of industrial safety. Duplication of effort exists due to a lack of coordination and communication between corporate and site personnel. Additionally, lack of strong direction by corporate industrial safety management has resulted in

arbitrary decisions by site personnel affecting industrial safety.

LP&L Response:

The LP&L Personnel Department Safety Section is evaluating this recommendation and will take action, as appropriate to ensure an effective Industrial Safety Program at Waterford 3.

LICENSING AND REGULATORY REQUIREMENTS

PERFORMANCE OBJECTIVE: A. The corporate nuclear licensing staff should be sufficient to carry out the functions necessary to support the issuance and maintenance of the nuclear station(s) operating license(s) and any additional required regulatory licenses or permits.

Recommendation (2.11A-1) Consider the transfer of all regulatory responsibility to the licensing section of the Nuclear Services Department. This action will ensure single point accountability for all regulatory correspondence and commitments. These responsibilities are currently split between the QA manager and the Nuclear Services manager. This dual responsibility does not maximize the development of expertise in resolving regulatory concerns.

LP&L Response:

To improve the definition and coordination of communications with the NRC and other regulatory agencies and to enhance LP&L's ability to carry out the functions necessary to support the issuance and maintenance of Waterford 3 licenses and permits, LP&L intends to implement the INPO Recommendation. To provide single point accountability for all regulatory correspondence and communications, a plan will be developed for the orderly transition of responsibilities from Quality Assurance and Plant Staff to the Nuclear Services Department, specifically the Nuclear Licensing Section.

In order to minimize adverse impact at this critical stage in the construction completion and licensing of the Waterford 3 project, implementation of the shift in responsibilities will be targeted for after receipt of an operating license. This is considered an appropriate timeframe to allow for re-definition of the organizational units; transfer or hiring of personnel and preparation or revision of required procedures.



LOUISIANA
POWER & LIGHT / INTER-OFFICE CORRESPONDENCE

February 7, 1984

W3H84-0015

TO: Distribution

FROM: R.P. Barkhurst

SUBJECT: Implementation of Radiation Protection Program

ENCLOSURE: Health Physics Implementation Plan

Attached you will find discussion of our intentions on this subject. If anyone has any questions on this matter please contact Ralph Kenning at 3149.


R.P. Barkhurst

RPB/RWK:dc

Enclosure

cc: R.S. Leddick, F.J. Drummond, T.F. Gerrets, N.S. Carns, D.E. Dobson, R. Marshall, L. Bass, W. Morgan, S.A. Alleman, L. Storz, O.D. Hayes, R.W. Kenning, J.R. McGaha, P.V. Prasankumar, W.E. Perks, G.M. Woodard, J. Woods, F.J. Englebracht, C. Packer, E.M. Benjamin, R.W. Lailheugue, T.J. Chiles, D. Packer, C. Toth, J. O'Hern, D. Simpson, H.A. Canavier, T.C. Payne, R.E. Sproles, A.L. Holder, A. Pastor, M.P. Flasch, V.D. McAdams, R.E. Allen, L.R. Simon, L. Myers, J.M. Andersen, G. Savage, H. Williams, K. Cook, R. Eurski

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FEB 8 1984

ILN: _____

February 4, 1984

SUBJECT: Health Physics Implementation Plan

While fuel loading will be a major milestone for Waterford 3 and will surely be a major public relations event for Louisiana Power & Light, the radiological implications are essentially miniscule. At the present time, the spent fuel pool is posted as a Radiation Controlled Area (RCA). Immediately prior to the start of fuel loading, we will post the refueling canal as a RCA. Access into the refueling canal will require a Radiation Work Permit (RWP), thus only qualified radiation workers will be allowed access to the bottom of the refueling canal. This will allow the multitude of interested plant and company personnel as well as other "important visitors" to have access to the edge of the refueling canal to view the fuel loading process. Once the last fuel assembly is placed in the core, the RCA posting for the refueling canal and spent fuel pool will be removed.

In order to prepare plant and contractor personnel for actual implementation of total radiological access control, after fuel loading but well before initial criticality, the plant RCA boundaries will be posted for "training" purposes. All personnel will be expected to access the RCA via the -4' HP control point, however no RWP's will be required nor will anyone be denied access. Hopefully, people will get into the routine of entering and exiting the RCA from the normal RCA access point.

Immediately prior to initial criticality, the RCA will be posted "for real" and the Waterford 3 Health Physics Program will be implemented in its entirety. Access to the RCA will be strictly via the -4' access point. RWP's will be required for entry and anyone entering the RCA must be a qualified radiation worker and have been issued a TLD. Access to the reactor building will be controlled in accordance with HP-1-213, Reactor Containment Building Power Entries. Additional radiological postings and requirements will be based upon HP surveys. It is anticipated that, from the time of initial criticality up through about 1% power, the vast majority of RCA entries will be done via

Standing RWP's (SRWP's). The only exceptions will be for work which involves breaching any potentially radioactive systems which will require a RWP specifically for that job. As we enter into power ascension testing, the use of SRWP's will drop with a corresponding increase in RWP's particularly as radiation and contamination levels increase with higher power levels.

R.W. Kenning

R.W. Kenning
Radiation Protection Superintendent