

July 23, 1984

WATERFORD 3
PROGRAM PLAN AND SCHEDULE

I. INTRODUCTION AND PURPOSE

This Program Plan outlines the methods by which the 23 individual issues described in the NRC letter, Docket No. 50-382, dated June 13, 1984, are to be resolved by LP&L. Further, the Plan provides a mechanism to address the cause of the issues, the generic implications and collective significance of the issues, and the programmatic and management changes designed to preclude recurrence of such issues. The Program includes a separate review of the resolutions by the Waterford 3 Safety Review Committee (SRC) Subcommittee and the establishment of an independent Task Force to advise LP&L and evaluate LP&L's resolution of the issues.

II. PROGRAM PLAN MANAGEMENT

1. The LP&L Project Manager - Nuclear is assigned responsibility for management of the overall Plan and actions outlined in paragraphs III and IV below. He will perform these tasks in a normal line management role and have access to and the support of any requisite LP&L and contractor managers and staffs on a top priority basis. He will assure effective interfaces with external groups including the SRC and the UNC/NUS Task Force described in paragraph VI below.
2. The Project Manager - Nuclear reports directly to the Senior Vice President - Nuclear, who in turn reports directly to the President and Chief Executive Officer of LP&L. Both the Senior Vice President - Nuclear and the CEO are directly and actively involved in the management of the Program.

III. RESOLUTION OF ISSUES

1. Each issue will be analyzed to determine:
 - The cause
 - The generic implication
 - The actions and schedules to correct both the specific problem and related generic concerns
 - The safety significance with respect to fuel load and low power operation, and to operation above 5% power

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2. The intended manner in which each of the 23 issues are to be addressed is described in Attachment 1. It should be noted that the manner of resolution may need modification as actions necessary to resolve any related safety concerns are undertaken or additional sources of information become available.

IV. COLLECTIVE SIGNIFICANCE AND PROGRAMMATIC CHANGES

As early as feasible in the process of formulating the information contained in paragraph III above, the LP&L Project Manager - Nuclear will:

1. assess the collective significance of the individual issues, and
2. recommend institutional or programmatic changes deemed appropriate to avoid recurrence of the types of problems underlying the issues being addressed.

V. SAFETY REVIEW COMMITTEE

1. The Waterford 3 Safety Review Committee (SRC) has designated an SRC subcommittee to review the items outlined in paragraph III and IV above.
2. The SRC subcommittee consists of Kenneth W. Cook, LP&L Nuclear Support and Licensing Manager, Chairman; Joseph M. Hendrie, Consulting Engineer; Robert M. Douglass, Manager of Quality Assurance, Baltimore Gas and Electric Company; and Raymond F. Burski, LP&L Engineering and Nuclear Safety Manager.

VI. INDEPENDENT ASSESSMENT

1. An independent assessment of the resolutions and determination of safety significance will be provided by a Task Force reporting directly to the CEO of LP&L. The Task Force consists of officials of UNC Nuclear Industries, Inc., Richland, Washington, and NUS Corporation, Gaithersburg, Maryland, who will be assisted by UNC and NUS staff members, as required. The Task Force will independently assess LP&L's resolution of the issues, including the cause, generic implications and collective significance of the issues. The Task Force will also provide advice and assistance in the resolution of the issues, and will provide an independent assessment of the safety significance of the issues with respect to fuel loading and low power testing, and operation above 5% power. It will assess the adequacy of LP&L QA/QC program in light of the NRC's issues, and will recommend any institutional or programmatic changes which may be necessary to prevent recurrence of the issues.

2. The charter, identification of principals, initial functions have been formalized, as specified in Attachment 2 hereto.

VII. RESPONSE TO NRC

The individual issues vary considerably in both the degree of concern and complexity of resolution. Therefore, LP&L intends to forward to the NRC the proposed resolution data individually or in packages as they are completed and have undergone the degree of review specified herein. Some of the resolutions may be submitted before completion of all requisite corrective actions, which are underway or defined and scheduled for accomplishment, have been accomplished. Upon submittal, each resolution will be added as Appendix A of the Program Plan to constitute a major part of the final report.

VIII. SCHEDULE

The goal of LP&L is to submit by mid-August 1984, the resolution of all issues, our assessment of the collective significance of those issues, and the programmatic changes deemed necessary to avoid recurrence of those issues which indicate such changes are appropriate.

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ISSUE & TITLE	DESCRIPTION OF ISSUE	LP&L APPROACH TO RESOLUTION	CURRENT ASSESSMENT
1. Inspection Personnel Issues	Verify the proper certification of site QA/QC personnel or requalify the work performed by these personnel.	<p>A verification program has been established to review the professional credentials of 100% of the site QA/QC personnel, including supervisors and managers. The discussion that follows applies to all contractors except J.A. Jones, Fegles and GEO, which are addressed in Issues 10 and 20. Criteria for certification or qualification of QA/QC personnel will be based on QA program requirements and contractual commitments.</p> <p>The adequacy of credentials to support certifications and qualifications is being reviewed. Criteria have been established to sort personnel files into 3 groups:</p> <ul style="list-style-type: none"> A. Qualifications deemed adequate B. Inadequate documentation to perform evaluation C. Qualifications questionable. <p>Other site files will then be researched and contractors contacted for personnel in groups B and C to verify their acceptability. In addition, background investigations will be performed for a sample of personnel in all groups, including essentially all Mercury personnel and a large sample of Tompkins- Beckwith personnel. If certification of an individual can not be justified, he will be placed in a fourth group designated group D (Qualification inadequate). Appropriate site nonconformance documentation will be initiated to document evaluation of safety significance and corrective actions, including reinspections of work performed as necessary.</p> <p>For Ebasco, LP&L, and other site construction related QA/QC personnel remaining on site, a reverification of proper certification is being accomplished in accordance with ANSI-N45.2.6-1973. Quality control functions currently being undertaken as part of the walkdowns in progress are being performed by personnel reverified as qualified under ANSI-N45.2.6-1973.</p>	To Be Determined

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2. Missing N1 Instrument Line Documentation	Verify compliance with NRC requirements for N1 instrumentation installations.	<p data-bbox="874 332 1476 472">Prior to the NRC inspection, the Ebasco Quality Assurance Installation Records Group had reviewed the ASME Section III portions of the N1 instrument installations. Full documentation on the installations under the scope of this review is available.</p> <p data-bbox="874 502 1476 667">The scope of this concern has been narrowed to 12 installations, 4 welded and 8 threaded. The documentation on the ANSI B31.1 portions of these instrument installations that were installed with class breaks (i.e. ASME Section III to ANSI B31.1) has also now been reviewed and is summarized as follows:</p> <ol data-bbox="874 697 1476 1196" style="list-style-type: none"> <li data-bbox="874 697 1476 741">1. Final visual inspection documentation is now available. <li data-bbox="874 771 1476 862">2. Ten installations have documented hydrostatic tests. The remaining two are HVAC welded connections and do not require hydrostatic testing. <li data-bbox="874 892 1476 982">3. Material traceability to the point of installation is not available, however, Certificates of Conformance to specification requirements are available. <li data-bbox="874 1012 1476 1129">4. Welder identifications are not available in all cases. However, all Mercury welders were required by procedure to demonstrate qualification for the appropriate welding process prior to being issued weldrod. <li data-bbox="874 1159 1476 1196">5. Nondestructive testing data is not required for these installations. <p data-bbox="874 1225 1476 1291">We have considered other design changes related to the classification of N1 instrument loops and have concluded that a similar situation has not occurred.</p>	The combination of the reviews described has provided assurance that documentation is available to assure the quality installation of all N1 instruments.

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3. Instrumentation Expansion Loop Separation	Correct separation criteria violations found in system 52A and provide a program for review of other safety- related systems for separation violations and take the necessary corrective actions.	<p>NCR-W3-7702 covers the system 52A problems and has been dispositioned to remove the expansion loops in question and replace with straight tubing.</p> <p>NCR-W3-7730 was generated to track the generic concern of tubing separation. In order to provide a basis for determining the scope of our approach, a sample of 45 additional instrument installations was reinspected. Those chosen were in congested areas where separation violations would have the highest probability of occurrence. Thirteen deficiencies were found out of 276 locations, and were evaluated. None required rework.</p> <p>A QC verification of all other lines (approximately 64) with redundant tubing runs in proximity of each other will be performed.</p>	<p>Although separation violations have been found, none so far identified would affect plant safety had they been left uncorrected.</p> <p>This provides a high level of confidence that other design considerations and walkdowns (i.e. pipe rupture/jet impingement analysis, non-seismic over seismic criteria and walkdowns) in combination with the tubing separation criteria have provided adequate protection for the instrument installations.</p> <p>A final determination of safety significance will be made upon com- pletion of the reinspection.</p>

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4. Lower Tier Corrective Actions Are Not Being Upgraded to NCRs	<p>LP&L shall review all FCRs, DCNs, EDNs, and T-B DNs to assure that proper corrective action was taken, including an adequate review by QA. This corrective action shall include the steps required by 10CFR50, Appendix B, Criterion XVI Corrective Action and for Construction Deficiency Reporting, 50.55(e). Also, included in this review shall be the examination of improper voiding of all other design changes or discrepancy notices that affected safety-related systems or that were misclassified as safety.</p>	<p>LP&L has to date reviewed all FCRs, DCNs, EDNs and Tompkins-Beckwith DNs cited by the NRC in the Description of Concern, as well as all voided EDNs.</p> <p>LP&L's review has established that only two of the fourteen cited FCRs/DCNs and three of the 22 cited EDNs and T-B DNs should have required an NCR. In each case however, there was no safety significance as regards 10CFR50.55e and 10CFR21. None of the voided EDNs required an NCR that was not generated.</p> <p>The response to this concern will provide an assessment of the lower tier document reporting system. It will verify that it was structured in such a manner that procedures, integral to the Quality Program, provided a sound basis for decisions regarding the severity level of documents used to report deficiencies. The assessment specifically considers QA and QC reviews of engineering/construction judgements on deficiencies as it relates to the corrective action and nonconformance requirements of 10 CFR 50 Appendix B and the reporting requirements of 10 CFR 50.55(e).</p> <p>A random sample of approximately 700 FCRs, DCNs, EDNs and T-B DNs will be formally reviewed to determine if any should in fact have been reported as NCRs. Any so judged will then be reviewed for reportability under 10CFR50.55e and 10CFR21.</p> <p>The results of this review will dictate whether there is a need to expand the sample size.</p>	<p>The current review has demonstrated that there has been adequate QA/QC involvement in all lower tier documents with regard to 10CFR50, Appendix B corrective action and non-conformance requirements. This involvement ensures that appropriate corrective actions, specific and generic, are identified.</p> <p>Our current evaluation of the examples of lower tier documents cited by the NRC demonstrates that although a small percentage should have been upgraded to NCR's under the quality program in effect, none had safety significance.</p> <p>Thus, LP&L has confidence that the sample review will provide additional evidence that the projects' system of "checks & balances" ensures that, despite isolated cases of judgemental or interpretative errors, all lower tier documents, as well as FCRs and DCNs receive adequate evaluation for safety significance.</p>

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5. Vendor Documentation Conditional Releases	The concern relates to whether shortcomings in contractor's documentation, particularly Combustion Engineering's, which existed at the time the material was supplied have been corrected.	<p>Records associated with CE material and equipment were re-reviewed and Conditional Certifications identified. An assessment of the potential for the existence of other manufacturing open items not being tracked in the Master Tracking System (MTS) was conducted. It led to the conclusion that the potential for a similar situation existed only in areas where problems are identified off-site relating to material to be shipped to the site. As a result of this concern the following areas are being evaluated:</p> <ul style="list-style-type: none"> * Concerns noted by vendor QA Reps on Release for shipment forms. * NCRs controlled by Ebasco's Home Office * Material received at the site under manufacture, deliver and erect type contracts. <p>To date 8 of 14 CE Conditional Certifications have been changed to unconditional. The remaining 6 will have Unconditional Certifications by 9/15/84. The issues that required resolution deal with technical manuals and have no effect on equipment operation.</p> <p>The review conducted on the other three areas of potential concern is nearing completion.</p>	<p>The existence of Conditional Certifications on CE equipment reflected incomplete Purchase Orders, not hardware or software deficiencies.</p> <p>No items of safety significance have been found thus far on the other three areas of concern.</p>

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<p>6. Dispositioning of Non-conformance and Discrepancy Reports</p>	<p>Some Ebasco and Mercury NCRs and Ebasco DRs were questionably dispositioned and LP&L shall propose a program to assure all NCRs and DRs are appropriately upgraded, adequately dispositioned and corrective action completed and that any problems detected are corrected.</p>	<p>First, the in-place program for handling of lower tier documents such as DRs will be discussed.</p> <p>Second, the specific NCRs and DRs cited by the NRC have been evaluated for proper designation, disposition, and implementation of corrective action under the existing quality program. Six of the fifty NCRs were determined to not have been adequately dispositioned and are under evaluation.</p> <p>Third, a program review of Ebasco NCRs was started by LP&L in January, 1984 to assess the validity of the disposition, the corrective action taken, the completeness of the documentation, and their proper closure. Approximately 460(6%) of the more than 7700 NCRs reviewed have been identified as having potential deficiencies in the above attributes. These are being evaluated. The deficiencies that have thus far been evaluated have no safety significance.</p> <p>Fourth, a field verification will be conducted on a random sample of 122 (over 25%) of the potentially deficient Ebasco NCRs to ensure that the hardware and/or software corrective action has been completed.</p> <p>Finally, the Mercury NCR's and Ebasco DR's cited by the NRC have been reviewed against the attributes mentioned in the concern. Information from this review is currently being evaluated.</p>	<p>To date none of the potentially deficient NCRs that have been reviewed and evaluated have safety significance.</p> <p>A final determination of safety significance will be made upon completion of the evaluations of potentially deficient NCRs and the field verification.</p>

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7. Backfill Soil Densities	Conduct a review of all soil packages for completeness and technical adequacy. Where records are missing or technical problems are defined, take corrective action.	<p>A review of backfill records (i.e. backfill soil density laboratory test data and inspection reports) was initiated to determine completeness and technical adequacy. A three stage program for the evaluation of soil backfill densities was implemented to (a) locate all backfill soil data, (b) review the test records for completeness and utilize these for the construction of relative density overlay plots, and (c) evaluate documentation and overlays for compliance with specification requirements.</p> <p>It was determined that a complete set of soils test data exists at the site, and that the field and laboratory testing and insitu relative density of the class A backfill were in compliance with specification requirements.</p> <p>A review for completeness of the remainder of the soil package data for attributes other than density, which includes all inspection reports, is presently being performed.</p>	The soil density is in compliance with specification requirements.

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8. Visual Examination of Shop Welds during Hydrostatic Testing	Document inspections of shop welds during hydro tests or otherwise verify such inspection.	<p>Shop welds were inspected and accepted during hydrostatic tests by an Authorized Nuclear Inspector.</p> <p>The ASME N-5 code data reports also confirmed that there was inspection of shop welds.</p> <p>The methodology of the field hydrostatic tests provided additional assurance that shop welds were inspected.</p>	No deficiency exists.

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9. Welder Certification	<p>Locate missing documents for instrument cabinet welds and determine if welders were appropriately certified. Take appropriate action to assure the quality of the supports if documentation cannot be located.</p>	<p>NCR W3-7549 was generated on 2/1/84 to track this problem. No documentation was found on three of the eighteen cabinets and partial documentation found on four. All seven were reinspected and found acceptable after evaluation by Engineering.</p> <p>As a result of the missing documentation, a review is being performed to determine other miscellaneous cases where J.A. Jones performed welding. Documentation for the welding identified will be reviewed.</p>	<p>All welding evaluated to date has been found acceptable. A final determination of safety significance will be made upon completion of the review.</p>

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10. Inspector Qualification (J. A. Jones and Fegles)	Verify the proper certification of QA/QC personnel and evaluate the impact of any deficiencies found.	<p>A verification program has been established to review the professional credentials of 100% of the site QA/QC personnel for J.A. Jones and Fegles, including supervisors and managers. Criteria for certification or qualification of QA/QC personnel will be based on QA program requirements and contractual commitments.</p> <p>The adequacy of credentials to support certifications and qualifications is being reviewed. Criteria have been established to sort personnel files into 3 groups:</p> <ul style="list-style-type: none"> A. Qualifications deemed adequate B. Inadequate documentation to perform evaluation C. Qualifications questionable <p>Other site files will then be researched, and J.A. Jones and Fegles contacted for personnel in groups B and C to verify their acceptability. In addition, background investigations will be performed for a sample of personnel in all groups. If certification of an individual cannot be justified, he will be placed in a fourth group designated group D (Qualification inadequate). Appropriate site nonconformance documentation will be initiated to document evaluation of safety significance and corrective actions, including reinspection of work performed as necessary.</p>	To Be Determined

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11. Cadwelding	Provide the cadweld data for the project in such a form that it can be readily compared to the testing criteria used for the Waterford 3 project with data broken down by various categories. Provide data on welder qualification and requalification including dates.	<p>The cadweld records have been transcribed onto computer data storage. This includes the placement area, cadweld number, cadwelder, bar size, bar position, visual test, production test, sister test, cadwelder qualification dates and inspector name and qualification dates.</p> <p>In this form the cadweld data can be called up by any of these attributes to expedite review for specification compliance or other reason. Also, physical location of cadwelds may then be readily obtained by reference to the concrete placement lift diagrams which locate the placements.</p> <p>Prior reviews have already been accomplished under NCR W3-6234 (opened 5/16/83) and nonconforming conditions resolved. A re-evaluation is being conducted now that the cadweld data is in a more systematic, auditable format.</p>	Based on the previous disposition of NCR W3-6234, there is no reason to anticipate any significant deficiency.

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12. Main Steamline Framing Restraints	Complete the document- ation for all connections in the steam generator framing.	<p>SCD 78 was resolved and subsequently reopened upon discovery that inspections in the steam generator framing were not complete. NCR-W3-7736 was issued to track resolution of the deficiency. A 100% QC reinspection of steam generator framing connections as well as a review of the American Bridge work-scope against the scope of SCD 78 reinspections was performed.</p> <p>This verified that only steam generator framing connections were omitted from the original scope of SCD 78. All corrective action has been completed.</p>	All corrective action has been completed in accordance with the criteria stated in the SCD 78 Documentation Package.

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13. Missing NCRs	<p>LP&L shall obtain the missing NCR's, explain why these NCR's were not maintained in the filing system, review them for proper voiding, and assure that when an issue is raised to an NCR, it is properly filed for tracking and closure.</p>	<p>The concern specifically stated that there were 10 NCR numbers missing from the QA vault and card index file. This is correct and is due to the fact that all of these NCRs were voided or cancelled prior to issuance as indicated in the manual log that was maintained at that time. The purpose of the card index file is to locate NCRs which are actually on file in the vault, not those that were voided or never issued.</p> <p>However, in response to the NRC's general statement that "Others were also noted to be missing from the Ebasco QA Vault", LP&L has:</p> <p>*Reviewed for accountability all Ebasco Site and New York Office issued closed or voided NCRs for accountability (8200 total NCRs).</p> <p>*Provided substantiating evidence on those NCRs indicated as void in the logs.</p> <p>*Provided substantiating evidence that NCR numbers in the sequence indicated not to have been assigned to an NCR is correct.</p>	<p>As a result of the review, all NCRs not on file in the QA vault were either found, located or probably not issued.</p>

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14. J. A. Jones Speed letters and EIRs	<p>During the Ebasco QA review of J. A. Jones speed letters and engineering information request, several items that could affect plant safety were noted. Based on its sample of these actions, the staff does not expect that any of these items will significantly affect plant safety. Nevertheless, the applicant should complete the actions identified in these reviews and issues raised shall be resolved promptly.</p>	<p>First, a review has been conducted of correspondence between J. A. Jones and Ebasco via Speed letters and EIRs. Second, correspondence which conveyed design changes to J. A. Jones without reference to follow-up action to formalize the changes was conducted to determine safety significance.</p> <p>Of approximately 1100 J.A. Jones documents reviewed, 271 appear to convey design changes. These 271 have been evaluated and researched on a case-by-case basis and determined to be acceptable as is even though they represent a procedure violation. No safety problems have been identified.</p> <p>Third, a minimum of 10% of engineering information requests generated by other safety-related contractors was sampled to determine if they used design changes conveyed by such informal documents. The sample size was expanded depending on the results of the initial review.</p> <p>Fourth, any design changes identified are being reviewed for safety significance.</p> <p>The initial review of the other safety related contractors has been completed. No safety related problems have been identified to date.</p> <p>Additional sampling is being performed on three contractors.</p>	<p>No problems of safety significance were found in the J.A. Jones correspondence. The review of other contractors is nearing completion and no problems of safety significance have been found to date.</p>

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15. Welding of "D" level Material Inside Containment	Locate the documentation for "D" level material welding and verify the adequacy of the information or perform a material analysis and NDE work, or rework the welds.	<p>The CB&I QA manual requirements for documentation of fit-up and final weld inspections do not apply, per their manual, to "D" material welds. This documentation is therefore not available for all "D" material welds.</p> <p>The "D" material welds were performed by the same welders and inspected by the same welding supervisors and to the same standards as the rest of the CB&I work for which documentation is provided. Considering this, and the quality of CB&I work on this project, it is not expected that any quality problem exists with "D" material welds. LP&L will, however, in accordance with a formal QA procedure:</p> <ul style="list-style-type: none"> * Strip paint off of a 5% sample of "D" material welds for which no documentation is available and provide full visual inspection. * Reinspect another 5% sample of "D" material welds without stripping paint. <p>The results of this reinspection will determine if there is a need to expand the sample size.</p> <p>To address the NRC's specific concerns, Ebasco has evaluated the containment spray piping weld attachments. All containment spray piping weld attachments were installed and documented by Tompkins-Beckwith except for two. The results so far demonstrate that failure of these two welds will not preclude the piping from performing its design basis function. Ebasco is presently finalizing the analysis by redistributing the loads to other supports under the assumption that the two "D" level attachments do not exist.</p>	Preliminary results from the ongoing inspection indicate that the "D" material welds are acceptable. A final determination of safety significance will be made upon completion of the reinspection.

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16. Surveys and Exit Interviews of QA Personnel	LP&L should develop and implement a formal program for handling issues raised by individuals. One of the first tasks to be dealt with by the program should be the review of the responses previously provided to the QA survey and during the exit interviews.	LP&L has secured the services of Quality Technology Company (QTC) to implement an enhanced program to conduct exit interviews of personnel departing the site. QTC will also review the interviews conducted to date to assess whether the corrective actions for the concerns identified thereon are appropriate. Procedures have been approved which assure management involvement.	Reviews to date have not identified safety concerns not already identified.

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17. QC Verification of Expansion Anchor Characteristics	The NRC is concerned whether there was sufficient QC verification of the characteristics necessary to ensure proper installation of concrete expansion anchors installed by Mercury.	<p>The review of this matter indicates that six of the seven cited QC reviews were made as required by the drawings which were referenced on the inspection forms. This was substantiated by a thorough review of Mercury quality records. LP&L will prepare a response discussing the incorporation of drawings into the procedure, training of Mercury personnel, the QC review and substantiation of records and evaluation of the cause of the problem.</p> <p>The seventh attribute cited by the NRC in spacing between anchor and embedded plate. The response will refer to Ebasco design drawings which allow anchor plates to overlap and be welded to embedded plates. It will also provide the results of an analysis performed on worst case situations of Mercury anchor plates butting up against embedded plates of different sizes which demonstrates that the anchor and embedded plates are still capable of withstanding the original design loads.</p> <p>Based on the above discussion and our review, no additional reinspection is believed necessary.</p> <p>No revision is necessary to procedure SP-666 since this procedure is no longer in use at the site.</p>	The review of Mercury QA records conducted by Ebasco prior to LP&L turnover, the resultant field verifications, and the directions provided by the documents referenced in the Mercury Expansion Anchor Procedure provide assurance that QC verification was adequate.

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18. Documentation of Walkdowns of Non-Safety Related Equipment	Documentation should be provided that clearly shows what equipment was reviewed during the walkdowns and on what bases it was concluded that the installation was acceptable.	Documentation attesting to the scope, conduct and results of the walkdowns will be provided. The response to this issue will also establish that in our opinion, the design and installation adequately considered the effects of interactions of non-seismic with safety-related systems during an SSE.	The design and construction of Waterford-3 considered interactions of non-seismic Mechanical, Electrical, HVAC, Civil and Instrumentation equipment with safety-related equipment. The walkdown verified that such interactions do not constitute a safety concern.

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19. Water in Basemat Instrumentation Conduit	Review all conduit that penetrates the basemat and terminates above the top of the basemat to assure that these potential direct access paths of water are properly sealed.	<p>A walkdown was performed which identified 28 places where wetness due to seepage from conduits was found and 12 places where evidence of past leaking from conduits was found. Neither the present slow seepage thru some of the seals nor the seepage that would result from a gross failure of the seals presents a flooding hazard. The decision to replace the seals will be based strictly on operational and maintenance considerations. Any replacement seals will consist of a light density silicone elastomer which has the capability to stop the seepage.</p> <p>Temporary conduits which enter the basemat from outside, and which once allowed passage of ground water in quantities that required periodic pumping, have now all been pressure grouted and their temporary blockout pits filled with concrete and no longer serve as a leak path for ground water.</p> <p>Two piezometers still in use utilize one riser which will be sealed with a light density silicone elastomer. The standpipe of one piezometer no longer in use will be pressure grouted.</p>	There was never a path for ground water to flow in sufficient quantity to flood the auxiliary building basement, even before the seals were installed and before the temporary conduits were grouted. The floor drain and sump pump system was more than adequate to handle the quantity of water which entered the building during construction, and is adequate to handle the much reduced quantity presently observed.

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20. Construction Materials Testing (CMT) Personnel Qualification Records.	Verify the proper certification of construction materials testing personnel.	<p>GEO has been contacted to assist in providing additional background information or justification for certification of QA/QC personnel identified as part of NCR #W3-F7-116.</p> <p>A verification program has been established to review the professional credentials of 100% of the GEO CMT site QA/QC personnel, including supervisors and managers. Criteria for certification or qualification of QA/QC personnel will be based on QA program requirements and GEO's contractual requirements.</p> <p>The adequacy of credentials to support certifications and qualifications is being reviewed. Criteria has been established to sort personnel files into 3 groups.</p> <p>A. Qualifications deemed adequate. B. Inadequate documentation to perform evaluation. C. Qualifications questionable</p> <p>Other site files will then be researched, and GEO contacted for personnel in groups B and C to verify their acceptability. In addition, background investigations will be performed for a sample of personnel in all groups. If certification of an individual can not be justified, he will be placed in a fourth group designated Group D (Qualification inadequate). Appropriate site nonconformance documentation will be initiated to document evaluation of safety significance and corrective actions, including reinspection of work performed as necessary.</p> <p>For GEO QC Inspectors remaining on site, a reverification is being completed of proper certification in accordance with ANSI-N45.2.6-1973.</p>	<p>The initial evaluation of this concern indicated "no safety significance" based on evaluation of nonconformance report #W3-F7-116. We are again reviewing the qualifications of QA/QC personnel on the nonconformance report and others to reconfirm our initial evaluation.</p>

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PROGRAM PLAN

ISSUE & TITLE	DESCRIPTION OF ISSUE	LP&L APPROACH TO RESOLUTION	CURRENT ASSESSMENT
21. LP&L Construction System Status and Transfer Reviews.	A concern exists over whether construction deficiencies were properly closed out or identified during the process of transferring systems from construction to plant operations.	<p>A review of transfer correspondence on the systems which were the cause of this concern has been performed. A review has also been conducted to verify that deficiencies in transferred systems had no impact on testing.</p> <p>A review was also conducted of hardware and software comments generated during status and transfer of safety-related systems.</p>	A review of 100% of turnover/transfer correspondence showed no additional correspondence was outstanding beyond that previously identified. Deficiencies identified on the outstanding correspondence (13 SUS) have been reviewed by LP&L start-up/operations and it was determined that there was no impact on testing.

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ISSUE & TITLE	DESCRIPTION OF ISSUE	LP&L APPROACH TO RESOLUTION	CURRENT ASSESSMENT
22. Welder Qualification (Mercury) and Filler Material Control (Site Wide)	<p>Verify welder qualifications or assure the quality of all welds.</p> <p>Provide engineering justification for the allowance of "rebake" temperatures and holding times that differ from the requirements of the ASME and AWS Codes.</p>	<p>The welder documentation is available which demonstrates that the welders were properly qualified.</p> <p>The response summarizes the site requirements for handling of welding electrodes and demonstrates that ASME code requirements are met; and that AWS D1.1 code requirements, through a documented deviation to the holding oven temperature, are also met.</p>	<p>All welders were found to be properly qualified. NCR-W3-7724 addressed and resolved qualification sheet errors for 3 welders (clerical errors which were committed after the welders left site).</p> <p>Code requirements for receiving shipping, storage and issuing and control of welding electrodes were met.</p> <p>The only deviation from explicit code requirements was a documented reduction in specified holding oven temperatures.</p>

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PROGRAM PLAN

ISSUE & TITLE	DESCRIPTION OF ISSUE	LP&L APPROACH TO RESOLUTION	CURRENT ASSESSMENT
23. QA Program Breakdown between Ebasco and Mercury.	<p>LP&L shall provide an assessment of the overall QA program and determine cause of the breakdown, together with corrective action to prevent recurrence. This overall assessment is necessary to provide assurance that the QA program can function adequately when the plant proceeds into operation.</p>	<p>First, LP&L is conducting a thorough review of the corrective actions associated with the 1982 NRC enforcement actions and civil penalty to determine the adequacy of follow-up related to corrective action commitments.</p> <p>Second, LP&L is conducting a thorough review of its QA audit program which has been in effect since July 1982. Particular attention will be placed on audits related to Mercury activities. This review will include an evaluation of the methods used for determining cause of identified problems and the systems used to assure effective follow-up and continued compliance with corrective action commitments.</p> <p>Third, LP&L is performing an overall assessment of the LP&L QA construction program based on the results of the above reviews to identify lessons learned and to determine if any improvements are required to assure adequacy of future operational QA program activities.</p> <p>The above actions are ongoing. Based on efforts to date, it is believed that LP&L can demonstrate that the extensive management and quality assurance actions taken by LP&L, Ebasco and Mercury subsequent to June, 1982, were appropriate; that most of the problems identified were part of the corrective actions on work previously done and are not indicative of continued inferior performance; and that the partial program breakdown did not persist.</p>	<p>To date the specific issues involve inadequate or inconsistent closure documentation, and not hardware impacting concerns. Thus far the review indicates that there are no open items affecting plant safety.</p>

JUL 27 1984



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June 20, 1984

J.M. CAIN
President and
Chief Executive Officer

W3B84-0445

Mr. Saul Levine
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910 Clopper Road
Gaithersburg, Maryland 20878

Mr. Robert L. Ferguson
UNC Nuclear Industries, Inc.
1200 Jadwin, Suite 425
Richland, Washington 99352

Mr. Larry L. Humphries
UNC Nuclear Industries, Inc.
P.O. Box 490
Richland, Washington 99352

SUBJECT: Pre-Licensing Issue Assessment
Task Force Charter

REFERENCE: Discussions in the Offices of Shaw, Pittman,
Potts & Trowbridge, Washington, D.C., June 13, 1984

Dear Messrs: Levine, Ferguson and Humphries:

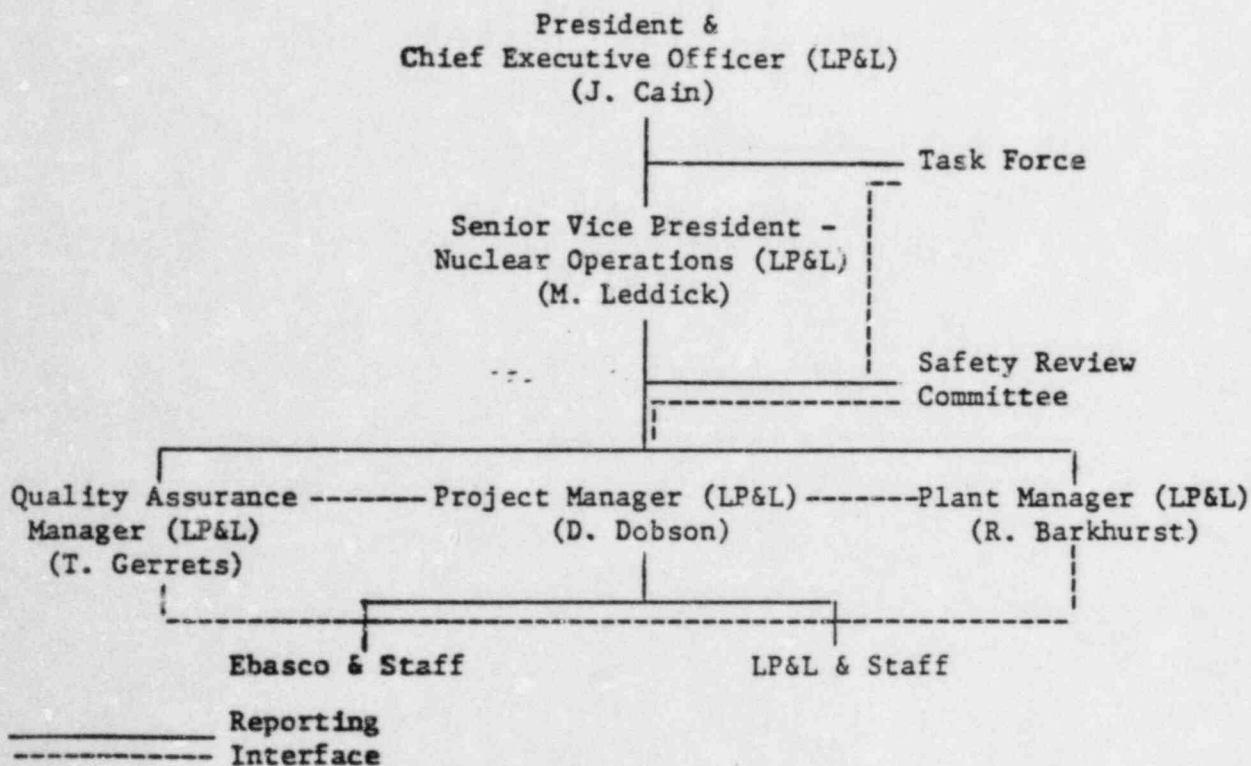
Pursuant to discussions in the referenced meeting, this formalizes agreements reached between us as to the charter of the subject Task Force.

The roles of UNC and NUS will be to act as a task force in providing assessment and advice in responding to the NRC letter of June 13, 1984. It is important to emphasize that both UNC and NUS will maintain sufficient independence in order to provide to me as Chief Executive Officer of LP&L an independent professional assessment regarding the functions listed below. Your assessments will be formalized and sent to the Director of the Office of Nuclear Reactor Operations at the same time they are provided to me.

- The Program Plan and implementation schedule requested in the NRC letter.
- The adequacy of responses and resolutions (including validation of data and sources, as appropriate) of the matters set out in the NRC letter.

- The safety significance of the matters listed in the NRC letter with respect to:
 - Fuel load and testing up to 5% power
 - Operation above 5% power
- The adequacy of the past QA/QC program in light of the matters listed in the NRC letter, and the resolution of such matters.
- Recommend institutional or programmatic changes that are deemed appropriate during plant operation in light of the lessons learned as a result of the matters set forth in the NRC letter, and the LP&L responses hereto.

The following abbreviated organization chart is provided to clearly depict that the Task Force is to have access to and interface with all necessary elements of the Waterford staff but is to report directly to me.



Very truly yours,

J.M. Cain
J.M. Cain

JMC:DED:pb

cc: G. Charnoff, R.S. Leddick, D.E. Dobson