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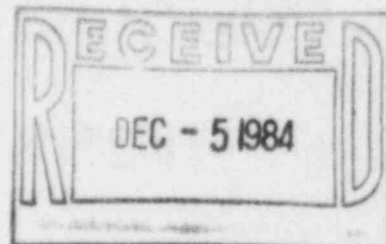
November 27, 1984

W3P84-3144
Q-3-A35.07
3-A1.01.04
A4.05

Mr. John T. Collins
Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

Dear Mr. Collins:

Subject: Waterford 3 SES
Docket No. 50-382
POTENTIALLY REPORTABLE DEFICIENCY NO. 179
LP&L (Maintenance) Welding Program Deficiencies
Final Report



- References:
1. Telecon - C.N. Hooper (LP&L) to W.A. Crossman (NRC) on September 7, 1984.
 2. Telecon - G.E. Wuller (LP&L) to L.E. Martin (NRC) on October 9, 1984.
 3. LP&L letter W3P84-2976 dated October 31, 1984.
 4. LP&L letter W3P84-2858 dated October 17, 1984.

In accordance with 10CFR50.55(e), LP&L provided telephone notification on September 7, 1984 (reference 1) of the subject deficiency regarding welding program inadequacies. References 2 and 3 provided schedule extensions for a report on PRD-179 with the latter advising of a November 30 schedule. Reference 4 was an interim report in which we advised you that the safety significance of the deficiency was still being evaluated.

LP&L has completed its review and evaluation of PRD-179 and has determined that the reported potential deficiency on the welding program is not a reportable deficiency per 10CFR50.55(e) on the basis of unfounded significance to operational safety. Enclosed are two copies of the final report on PRD-179. Further details on the deficiency are available in our files should NRC desire additional information.

Very truly yours,

K.W. Cook
Nuclear Support & Licensing Manager

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Enclosure

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FINAL REPORT
POTENTIALLY REPORTABLE DEFICIENCY NO. 179
"LP&L (MAINTENANCE) WELDING PROGRAM DEFICIENCIES"

INTRODUCTION

This report is submitted pursuant to the telephone notification of September 7, 1984 whereby a potential deficiency per 10CFR50.55(e) was reported. It describes deficiencies identified by Operational QA through a scheduled audit of the LP&L Maintenance Welding Program.

DESCRIPTION

During a review of welding procedure specifications (WPS) by Operations QA, it was noted that certain variables of ASME Section IX were not adequately addressed. In particular, the procedure did not explicitly specify the method for controlling welder activities within the welder qualification limits. The audit also identified some instances where documentation of welder qualifications was insufficient. It was also found that LP&L purchased/contracted testing and test evaluation services from vendors/subcontractors not listed on the LP&L qualified suppliers list (QSL).

SAFETY IMPLICATIONS

The original finding of the welding program inadequacies rendered the quality of welds performed by the maintenance department indeterminate. Subsequent evaluations by Plant Staff found that all safety related welds were found to be acceptable when subjected to the originally required non-destructive examination (NDE) (dye penetrant). Therefore, it has been determined that these welds met the design intent and would have performed their required functions if left uncorrected. PRD-179 is deemed to be a non-reportable deficiency per 10CFR50.55(e) on the basis of unfounded significance to operational safety.

CORRECTIVE ACTION

The administrative procedures which control welder qualification and weld procedure qualification have been reviewed and revised as necessary.

The problems identified by QA were analyzed and the deficiencies found to be with groove welds only. The adequacy of most groove welds was quantitatively deduced from analysis of the weld data. The remaining groove welds were analyzed for safety significance and it was determined that safe operation of the plant would not have been adversely affected if the welds had remained uncorrected. However, LP&L elected to rework the groove welds using revised/approved procedures only to provide assurance of meeting acceptance criteria of the governing codes and specifications.

The subcontractors/QSL problem was determined to be an administrative problem and has since been resolved and evaluated as non-significant.

This report is submitted as the final report.

Mr. John T. Collins

W3P84-3144

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cc: Director, Office of I&E
Director, Office of Management
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