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MIDDLE SOUTH UTILITIES SYSTEM

December 26, 1984

W3P84-3454
3-A20.02.02
3-A1.01.04
A4.05

Mr. Stephen M. Goldberg
Quality Assurance Branch
Division of Quality Assurance, Safeguards
and Inspection Programs
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: Waterford SES Unit No. 3
Docket No. 50-382
Proposed Generic Letter, "Quality Assurance Guidance Related to Anticipated Transients Without Scram (ATWS) Equipment that is not Safety-Related"

Dear Sir:

Louisiana Power & Light Company (LP&L) is pleased to provide comments on the subject proposed Generic Letter published November 6, 1984 in the Federal Register. Our remarks are both general and plant-specific in nature and are described in subsections A and B, respectively. We believe you will find our comments helpful in evaluating the proposed ATWS QA guidance. LP&L is opposed to the introduction of any formally required quality measures for non-safety related equipment because we believe that all activities affecting the basic power plant at Waterford 3 are adequately addressed by current procedural controls (discussed further in Attachment A).

A. Our interactions with other utilities confirm our opinion that the extent of quality measures applied to non-safety related equipment are best determined on an individual plant basis and are unique to plant design and administrative structure. Generically imposed requirements would only have a detrimental effect on plant unique requirements. For this reason and for those listed below, we feel that the proposed Generic Letter should be withdrawn or greatly modified:

1. Appendix B criteria, when properly applied, assure the quality of safety related systems. In the case of redundant reactor trip systems, a breakdown in reliability of safety related systems does not necessitate an extension of formal quality assurance requirements to non-safety related systems such as the ATWS equipment. Rather it demands a re-evaluation of how the current Appendix B criteria are specifically applied to existing redundant trip systems. Generic Letter 83-28 adequately performed this re-evaluation.

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2. It would be untimely to issue the proposed Generic Letter in light of the confusion that would be added to related industry issues. Decisions involving the recent petition for rule-making to resolve the "important-to-safety" issue could potentially be biased by such a letter. It could interfere with the reviews of people related issues (e.g. maintenance, quality improvement and shift management) by the Nuclear Utility Management and Human Resources Committee (NUMARC). This senior utility executive committee is examining an integrated approach toward achieving high levels of safety and reliability in nuclear plant operations. Finally, a Generic Letter of the type proposed is a step in the direction away from the Government Accountability Office (GAO) suggestion that the NRC staff management take into consideration the interdependencies of issues which are outstanding (refer pg. 16, GAO/RECD-84-149 of 9/19/84).

3. Expanding formal QA requirements in the direction of non-safety related equipment can have a tendency to be counterproductive to quality. Excessive requirements can discourage self-monitoring and taking individual responsibility to ensure plant quality as the ability to do so reaches the point of saturation. There is a point of diminishing returns beyond which management attention is shifted away from overall plant reliability as it becomes focused on rewriting procedures, retraining personnel and making required documentation available for each new category of equipment identified by the NRC.

B. Our specific criticisms of the Generic Letter content unique to Waterford 3 are as follows:

1. The text states that documentation is <u>not</u> required to verify that internal control procedures are followed, but this is exactly what Waterford 3 personnel will have to do if documentation is required as stated for design, installation, testing, operation and maintenance which are controlled by internal procedures. Documentation implies that verifying information be kept in an auditable file. Though the Generic Letter does not require independent organizational involvement, surveillance by the QA organization will be necessary to ensure inspectability of the documenting material. Our current plant operating procedures as summarized in Attachment A provide adequate documentation and procedural control for non-safety related ATWS equipment such that any additional documentation requirements are not necessary. All documentation requirements should be deleted from the proposed Generic Letter to prevent individual interpretation from imposing additional controls beyond that which is currently considered adequate.

2. The summary of QA guidance ignores the interrelationship of the various Appendix B related requirements. Since portions of fifteen of the eighteen Appendix B requirements are implied by the summary, the tendency created is a push toward treating non-safety related ATWS equipment the same as safety-related. The alternative would be to write a new QA program for such equipment which is not the stated intent of the proposed Generic Letter.

3. At Waterford 3 limited scope quality measures have been implemented for non-safety related programmatic areas that may have a limited significance to the public health and safety. Portions of selected 10CFR50 Appendix B criteria have been applied to areas such as fire protection, rad waste management and security consistent with regulatory guidance and LP&L management determination of applicability. At Waterford 3, the QA organization has responsibility for development and audit of limited scope quality programs. Such programs are concurred with by senior management and approved by the Senior Vice-President Nuclear Operations. Again, however, we feel that our current treatment of non-safety related equipment (Attachment A) is adequate for ATWS equipment and that a limited scope quality program would not be needed. The additional personnel training and procedural changes for such a program would not be warranted when existing treatment of basic power plant systems is equivalent to that suggested for ATWS equipment by the proposed Generic Letter.

4. An exemption clause should be included in the proposed Generic Letter, if issued, to allow utilities to request an exemption based on the merits of their individual programs which demonstrate equivalent protection to the quality measures required by the Generic Letter or rule.

In summary, LP&L feels that implementation of specific quality measures for non-safety related ATWS equipment are not necessary for reasons demonstrated in this letter and its attachment. Based on the adequacy of quality measures currently applied to basic power plant systems at Waterford 3, we recommend that the proposed Generic Letter on QA guidance for ATWS be withdrawn or modified to allow utilities the option of demonstrating how their individual programs meet the intent of the quality requirements of the ATWS rule.

Very truly yours,

K W Cook

K.W. Cook
Nuclear Support & Licensing Manager

KWC/KNC/pcl

cc: E.L. Blake, W.M. Stevenson, R.D. Martin, D.M. Crutchfield, J. Wilson, G.L. Constable

COMPARISON OF PLANT SPECIFIC QUALITY MEASURES
APPLIED TO NON-SAFETY RELATED EQUIPMENT TO PROPOSED
SUMMARY OF QA GUIDANCE

III. Design Control - Any hardware change involving additions, deletions, or functional modifications of equipment systems or structures at the Waterford 3 SES facility is controlled by station modification procedures, regardless of the safety classification of the equipment involved. The engineer assigned to a modification will insure that all applicable codes, standards, specifications, licenses and predetermined safety restrictions are included in the station modification package. The supervisor in the applicable department approves each modification package.

IV. Procurement Document Control - Procurement of materials and services are controlled through Material/Services Request (MSR) and Purchase Requisition (PR) forms. An MSR is filled out for requested items or services (e.g. from a bill of materials associated with a modification).

After reviewing a plant support MSR against applicable design requirements and governing purchase order specifications, a Purchase Order is issued with the required portions of specifications and codes included in the PR. Copies of approved PR's are kept on file for purposes of procurement documentation.

V. Instructions, Procedures, Drawings - Approved instructions, procedures and drawings define performance objectives for activities that affect plant quality.

VI. Document Control - Procedures require that LP&L's document control centers control the issuance of instructions, procedures, drawings and changes thereto. Such documents include: Architect Engineer (AE) generated drawings and specifications, Vendor/contractor supplied drawings, certain procedure manuals, purchase orders and contracts. Control includes numbering, stamping, reproduction, transmittal and verifying receipt of controlled documentation. Records are kept of received documents and subsequent issuance of controlled copies.

VII. Control of Purchase Items or Services - All plant support items are receipt inspected by stores or plant quality personnel. Inspection of plant support items which are non-safety related are documented on stores receipt inspection reports which do not require receipt inspection by plant quality personnel. Comparison of a receipt inspected item to the purchase order description is documented on a material receiving report to assure its conformance to purchase order requirements.

VIII. Identification and Control of Purchased Items - Non-safety related plant support items are tagged with release tags not requiring QC inspection and with accompanying vendor or part identification. Purchased items are issued on presentation of a completed requisition form which includes parameters such as P.O. number, materials intended use, and a traceable number (e.g. a test procedure, CIWA, or maintenance procedure number). Non-safety related items do not necessarily retain unique identification after receipt inspection, especially stock items such as pipe fittings, conduit stock, steel straps, etc.

IX. Control of Special Processes - Work authorization procedures require that procedures and personnel be qualified to the special process to be performed. Specific requirements for special processes are provided in procedures approved at the department head level and apply to all work done regardless of safety classification.

X. Inspection - The Condition Identification Work Authorization (CIWA) form is used to identify and correct abnormal conditions, and to authorize/control work performed on a basic power plant (i.e. those in-place active and standby systems/components used for or in support of power production). The department/group head responsible for preparing the CIWA package determines the need for inspections to predetermined requirements, and includes them in the CIWA work instructions or accompanying test/work procedure. Inspectors are trained and qualified to the type inspection required in accordance with plant administrative procedures for non-safety related work.

XI. Test Control - Testing associated with installation of non-safety related (as well as safety related) hardware changes is initiated, controlled and documented through the use of CIWA's accompanying a station modification package. Test results are reviewed and approved in accordance with administrative procedures.

XII. Control of Measuring and Test Equipment - Where required for accuracy of measurement, measuring and test equipment (MT&E) is controlled, calibrated and adjusted at periodic intervals. Plant administrative procedures define MT&E control measures.

XIII. Handling, Storage and Shipping - By procedure, activities related to handling, storage and shipping of a purchase are based on the manufacturer's documented recommendations or instructions. Deviation from the manufacturer's recommendations are appropriately justified and documented.

XIV. Inspection Testing and Operating Status - Operating status of equipment affected by testing, maintenance, repair or other conditions are tracked as follows:

(1) Removal and restoration from service of non-safety related equipment with a potential for affecting plant generating capacity is documented.

(2) The CIWA procedure insures that necessary testing, rework, repair, inspections or other requirements have been completed prior to restoration of equipment to service.

XV. Nonconformance - Abnormal conditions observed in the course of inspections, testing, maintenance and operation are identified, evaluated and corrected using a CIWA. Discrepant components are appropriately tagged until correction of the nonconformance is completed.

XVI. Corrective Action System - An initial evaluation of all non-conformance CIWA's is made for corrective maintenance follow-up. Non-conforming items and conditions that have been corrected are reinspected in accordance with original or additional requirements as determined by the corrective action process.

XVII. Records - Completed SMP's provide the necessary documentation that design specifications have been met for hardware changes involving non-safety related systems affecting the basic power plant.