

APPENDIX

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-382/85-18

License: NPF-38

Docket: 50-382

Licensee: Louisiana Power & Light Company (LP&L)
142 Delaronde Street
New Orleans, Louisiana 70174

Facility Name: Waterford 3 Steam Electric Station

Inspection At: Taft, St. Charles Parish, Louisiana

Inspection Conducted: May 20-24, 1985

Inspectors:

Blaine Murray

R. E. Baer, Radiation Specialist
for Facilities Radiological Protection Section

6/26/85
Date

Blaine Murray

Russell Wise, Radiation Specialist
for Facilities Radiological Protection Section

6/26/85
Date

Approved:

Blaine Murray

Blaine Murray, Chief, Facilities Radiological
Protection Section

6/26/85
Date

G. L. Constable

for G. L. Constable, Chief, Project Section B
Reactor Project Branch 1

7/2/85
Date

Inspection Summary

Inspection Conducted May 20-24, 1985 (Report 50-382/85-18)

Areas Inspected: Routine, unannounced inspection of the licensee's radioactive waste management controls, training and qualifications, radwaste startup, solid liquid, and gaseous waste systems. The inspection involved 72 inspector-hours onsite by two NRC inspectors.

Results: Within the areas inspected, no violations or deviations were identified.

DETAILS

1. Persons Contacted

LP&L

- *R. P. Barkhurst, Plant Manager
- *S. A. Alleman, Assistant Plant Manager, Plant Technical Services
- R. E. Allen, Chemical Engineer
- *P. N. Backes, Quality Assurance (QA) Representative
- R. E. Beasley, Health Physics (HP) Supervisor
- *K. L. Brewster, Licensing Engineer
- D. E. Brown, Nuclear Training Instructor
- G. L. Dolese, Radiochemist
- *D. H. Espenan, HP Supervisor
- *J. L. Etheridge, Corporate Radwaste Engineer
- *C. R. Hall, HP Supervisor
- *R. W. Kenning, Radiation Protection Superintendent
- D. A. Landeche, HP Supervisor
- B. J. Matherne, Instrument and Control (I&C) Supervisor
- J. V. Messina, QA Representative
- M. H. Miller, I&C Technical Specialist
- *D. Packer, Plant Training Manager
- W. N. Perry, Training Instructor
- R. G. Pittman, Senior QA Representative
- *D. M. Rieder, Radwaste Associate Engineer
- B. D. Rhodes, I&C Technical Specifications (TS) Technician
- A. R. Roberts, QA Representative
- B. P. Rocco, Effluent and Environmental Coordinator
- *E. M. Rollins, Radiological Control Unit Coordinator
- L. R. Simon, Radwaste Engineer
- *D. Stevens, Radwaste Engineering Technician
- *J. O. Woods, Plant Quality Manager

Others

- G. L. Constable, NRC Senior Resident Inspector
- *T. A. Flippo, NRC Resident Inspector
- D. E. Marpe, Systems Engineer (consultant)

The NRC inspectors also interviewed other licensee and contractor employees including administrative, training, maintenance, radwaste, and radiation protection personnel during this inspection.

*Denotes those individuals present during the exit interview on May 24, 1985.

2. Licensee Action on Previously Identified Inspection Findings

(Closed) Open Item (382/8506-01): EOF Air Filtration System - This item involved the lack of in-place surveillance testing of the high efficiency particulate air (HEPA) and charcoal adsorber filters installed in the emergency operations facility (EOF). The licensee had a vendor perform in-place testing on the EOF emergency ventilation filter housing, HEPA, and charcoal adsorber filters during the period of April 30 - May 3, 1985. Previously identified system deficiencies had been corrected. This item is considered closed.

(Closed) Unresolved Item (382/8514-01): Use Of Metals Pond for Discharge of Steam Generator Blowdown (SGB) - During NRC Inspection 50-382/85-14, it could not be verified that a satisfactory safety analysis had been made of SGB releases to the metal waste pond. During this inspection, it was determined that a satisfactory safety analysis had been made addressing SGB to the metal waste pond. This item is considered closed.

3. Radioactive Waste Management Organization

The NRC inspectors reviewed the licensee's onsite organization involved in radioactive waste management to determine compliance with Final Safety Analysis Report (FSAR) commitments.

The NRC inspectors reviewed the Nuclear Operations Management Manual (NOMM) Section IV. Chapter 5 addresses radioactive waste management and defines the responsibilities, authorities, and organizational relationships for groups and departments involved with radioactive waste generation, processing, analysis, and transportation.

The NRC inspectors noted that Attachment 1 to the NOMM addressed the QA program for transport packaging and references the requirements of 10 CFR 71.101. The licensee had not received NRC approval in accordance with 10 CFR 71.101(c). Discussions with licensee representatives indicated that they had either just submitted the QA program to the NRC for approval or were about to submit the program.

The NRC inspectors verified that the organization and management controls of the current radwaste organization were as depicted in the FSAR. The current organization had one vacant helper position. The licensee was actively pursuing filling the vacant position. Eight additional contractor decontamination technicians were onsite to supplement the plant staff.

The NRC inspectors reviewed QA Audit No. SA-W3-QA-85-12, "Radioactive Waste Management and Shipping," conducted by the licensee during the period March 4, through April 9, 1985. No significant deficiencies were identified; however, seven observations for improvement were noted in the audit report.

No violations or deviations were identified.

4. Radwaste Training and Qualifications

The NRC inspectors reviewed the training and qualification program for radwaste department personnel, radwaste systems operators, and radwaste training instructors.

The NRC inspectors discussed with licensee representatives the status of training for radwaste workers including nuclear auxiliary operators (NAO). The licensee had completed training for all radwaste department personnel and NAOs. Retraining had not started at the time of this inspection. The NRC inspectors noted that a means of communication had not been established between the training instructors and the radwaste engineer where work deficiencies could be discussed and retraining directed toward correcting these deficiencies.

The NRC inspectors reviewed QA Audit No. SA-W3-QA-84-47, "Health Physics and Radwaste Technician/Helper Training," conducted December 10-13, 1984, and January 2-8, 1985, and SA-W3-QA-85-04, "Operator Training/Qualification," conducted February 11-27, 1985. The NRC inspectors noted that this operator training/qualifications audit was primarily directed toward licensed operators and did not include the NAOs and their radwaste activities.

The NRC inspectors expressed concern that the licensee did not provide training, preliminary testing, qualification card, or resume verification for contractor employees classified as decontamination technicians. The licensee stated that personnel were screened, but they had no written criterion for selection.

No violations or deviations were identified.

5. Radwaste Startup

The NRC inspectors reviewed licensee's records and sampling schedules for the monitoring of nonradioactive process and effluent streams to preclude the potential for unmonitored, uncontrolled releases of radioactivity to the environment.

The licensee had initiated a sampling program and had obtained samples of the various process streams. The NRC inspectors noted that all of the process streams identified in Inspection and Enforcement Bulletin 80-10 were not being sampled. The NRC inspectors discussed with licensee representatives the desirability of re-evaluating those process streams not being sampled and including them in the quarterly surveillance schedule. The licensee stated they would review the NRC inspector's concern.

The NRC inspectors noted that the licensee had 28 contaminated areas with radioactivity levels varying from 1,000 to 120,000 disintegration per minutes per 100 square centimeters. Some areas such as the spent resin tank room on the -4 foot elevation had water on the floor which was the result of overflowing the tank. It was also noted that numerous valves were leaking thorough out the radwaste building.

No violations or deviations were identified.

6. Solid Waste Systems

The NRC inspectors reviewed the solid radwaste management system including the spent resin system and dry active waste system to determine compliance with TS and FSAR commitments.

The licensee had installed a vendor supplied portable solidification system. The NRC inspectors expressed concern regarding the licensee's classifying this as a temporary system. The licensee has no other system available, operational, or being designed that would replace this temporary system; therefore, it appears that this temporary system is intended to replace the permanent solid waste system and should be designated as the permanent system. Section VI, Chapter 5, of the NOMM states, "The following paragraphs define the limited scope quality program for activities associated with the design, procurement, construction/modification, testing and operation of permanent radioactive waste management structures, systems and components." The portable solidification system being classified as "temporary" falls outside the QA program and does not require that these vendors be placed on the qualified suppliers list. The licensee was also using other "Temporary Services" which are vendor supplied for processing radioactive waste which are not on the qualified supplier's list.

The licensee had not offered for transport any packages of radioactive materials. The licensee was actively pursuing exemption under 10 CFR 20.302 for certain solidified waste presently onsite.

No violations or deviations were identified.

7. Liquids and Liquid Waste Systems

The NRC inspectors reviewed the licensee's liquid waste management system to determine compliance with TS and FSAR commitments.

The licensee was still experiencing difficulty controlling the generation of large quantities of liquid waste. The licensee stated that an additional 40,000 gallon liquid waste holdup tank will be installed as part of the liquid waste management system. This had been identified in "Station Modification Project 257, Revision 4." The NRC inspectors discussed with licensee representatives the need for a written safety evaluation (10 CFR 50.59) review and an ALARA review for the proposed change to the liquid waste system. The licensee exhibited a "Nuclear Safety Review Checklist," dated April 23, 1985, and an "ALARA Design Review Comment Sheet," dated May 15, 1985, which had been performed to satisfy the above TS requirements.

The licensee had implemented the use of a portable demineralizer system to process liquid waste as stated in Section 11.2.1.5 of the FSAR. The NRC inspectors noted that licensee NAOs have had problems with the operation of the portable demineralizer system from attempting to sluice dry resins, forgetting to close valves, and putting the wrong resin in a vessel. The licensee stated that a second operator from the portable demineralizer system supplier was scheduled onsite and this should reduce the incidents of operator error.

The NRC inspectors expressed concern about the hoses used on the portable demineralizer system. The operators log indicated that on February 11, 1985, the line ruptured and flooded the drumming station room on the +21 foot elevation; on April 12, 1985, the line to the demineralizer ruptured; and on April 14, 1985, the line to the cation skid ruptured. The NRC inspectors suggested that the licensee should evaluate the type of hose and connectors utilized and take the necessary action to reduce the incident of hose failures.

The licensee had initiated 103 liquid release permits as of May 22, 1985. The NRC inspectors reviewed selected releases to determine compliance with 10 CFR 20 and TS. Releases appear to be within regulatory limits.

The licensee had submitted a TS change request to Nuclear Reactor Regulation (NRR) on May 14, 1985, to provide for automatic termination of steam generator blowdown discharge (SGBD) through the circulating water system (CWS), a continuous sampler in the SGB effluent line, and to

define the sampling and analysis program for SGBD through the CWS or to the Waterford 3 waste pond. This TS change request was submitted to amend discharge conditions that existed on April 4, 1985, and reported in Licensee Event Report 85-13, dated May 3, 1985.

No violations or deviations were identified.

8. Gaseous Waste System

The NRC inspectors reviewed the licensee's gaseous waste management system to determine compliance with TS and FSAR requirements.

The NRC inspectors discussed with licensee representatives the status of those gaseous effluent monitors which are to be recalibrated with radioactive gases within 6 months after issuance of the operating license. The licensee was in the process of recalibration of effluent radiation monitors in accordance with procedures, M1-TEM-001, "Primary Calibration of Radiation Monitor (PRM-1R-0100.1S or .2S) Gas Channel," Revision 0, April 1, 1985, and M1-TEM-002, "Radiation Monitor (PRM-1R-0648)" Revision 1, May 15, 1985. The NRC inspectors stated that they would review the results of these recalibration when completed.

No violations or deviations were identified.

9. Exit Interview

The NRC inspectors met with licensee representatives identified in paragraph 1 and the NRC resident inspector at the conclusion of the inspection on May 24, 1985. The NRC inspectors summarized the scope and findings of the inspection.