



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

June 15, 1984

Docket No. 50-382

MEMORANDUM FOR: All Waterford 3 Special Review Team Members

FROM: Darrell G. Eisenhut, Director  
Division of Licensing

SUBJECT: RECENT GAMBIT NEWSPAPER ARTICLE

The June 2, 1984 issue of Gambit contained an article that included a discussion of the team effort at Waterford Unit 3. That article stated that the team is under "intense pressure" to either "gloss over" the issues or "forewarn" the utility of the nature of the allegations under review. A copy of the Gambit article is enclosed for your information.

While I am aware of no "intense pressure" to license this plant, let me reiterate to each of you that we have gone to great length to assemble a large, highly qualified, dedicated team of experts to thoroughly review this plant. It is our intention to thoroughly resolve all necessary technical issues on this plant and to directly use the results of this effort in reaching our licensing decision.

While I recognize that many of us often receive calls from various sources including Congressional staff, utility management, members of the public, intervenor groups, and more frequently GAP, it is imperative that each of you not be influenced by any such calls, comments and pressure.

Accordingly, if you feel that you have, or are receiving pressure to compromise your efforts in any way, please let me know immediately. It is my intention to fully followup on any such "pressure," be it from within the NRC, from the utility, or from other external sources.

*Darrell G. Eisenhut*  
Darrell G. Eisenhut, Director  
Division of Licensing

Enclosure:  
As stated

cc: W. Dircks, EDO  
H. Denton, NRR  
J. Collins, Region IV  
R. DeYoung, IE  
B. Hayes, OI  
G. Messenger, OIA  
D. Crutchfield, NP

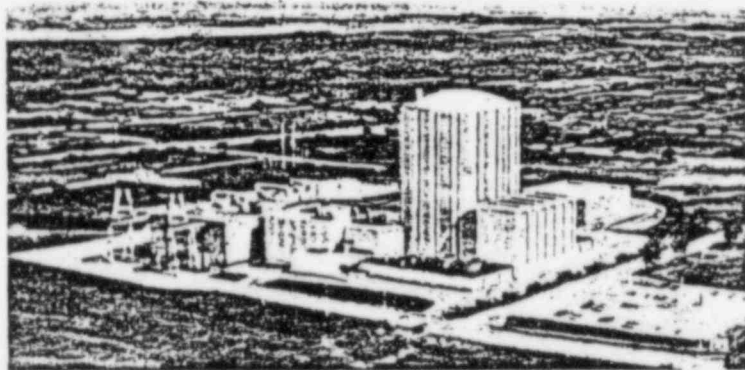
84060260464 XA  
380

JUNE 2, 1984

GAMBIT

By NON RIDENI OUR

# IS THE FIX IN AT WATERFORD III?



On May 14 the U.S. Nuclear Regulatory Commission released a report of a special inspection team's month-long inquiry into the quality of the construction work done at Louisiana Power and Light Company's troubled Waterford 3 nuclear power plant. While the report of the NRC's Construction Assessment Team (CAT) was by no means glowing, it did conclude that the "major portion" of Waterford's construction program measured up to the NRC's standards.

On the day following the release of the CAT report, May 15, the plant suffered a serious malfunction, water hammer, in Waterford's critical safety system, the emergency core cooling system (ECCS). The ECCS is the system designed to keep Waterford's reactor core cool during an emergency. Water hammer, the intense buffeting of a piping system by highly pressurized water, is considered by the NRC to be one of the most dangerous unanticipated events that can occur in an operating reactor. The May 15th water hammer incident, together with a similar incident on May 10, bent and twisted 20 or so pipe hangers and supports over a length of somewhere between 100 and 200 feet of pipe, according to NRC sources. Both incidents occurred during routine testing of the system. Although the CAT report details a series of problems discovered at the plant, it makes no mention of the potential for water hammer damage to the ECCS, which was one of the systems the team checked.

The CAT report and its cover letter are the first official words from any of the three major NRC inquiries into management and construction practices at Waterford that have been initiated since February, when the CAT inspection began. Two other investigations, both larger and more intense than the CAT inspection, began on April 2. The CAT report delineates a series of breakdowns in LP&L's management program. Those management failures, taken as a whole, portray a utility whose quality control and quality assurance programs have seldom met federal requirements.

LP&L's inability (or unwillingness) to

implement an effective quality assurance program is called the culprit, "the underlying cause," of all of Waterford's problems in the CAT report. According to the report, LP&L "has had difficulties in implementing an effective in process quality assurance program and the NRC CAT considers this as the underlying cause for the deficiencies found during this inspection."

Secondly, the report says, the company's problem in its failure to implement an effective program to ensure the quality of their workers' work was compounded: their workers' work wasn't right much of the time. Referring to the breakdown of LP&L's QA program as the source of Waterford's problems, the report concludes that one of the most fundamental of those problems was the inability of LP&L and its "contractors to convince personnel at all levels in the organization to perform their respective tasks correctly the first time."

Richard C. DeYoung, Director of the NRC's Office of Inspections and Enforcement, issued the report under a two page cover letter containing a pointed criticism, one that seems to compound the first two failures: "your apparent failure to take proper corrective actions subsequent to the identification of problem areas by Region IV." DeYoung then names five areas in which Region IV inspectors "identified" problems at Waterford and says that: "In each case, Region IV was notified that proper and preventive action had been implemented; however, the CAT inspectors identified recurring deficiencies in these five areas." The five areas are: heating, ventilating and air conditioning (HVAC) and electrical raceway seismic supports; American Bridge structural steel welding; as-built verification of piping supports and restraints; maintenance of equipment transferred to operations; and pipe to structure clearances.

Independent sources close to the NRC's special Waterford task force, one of the two investigations that began on April 2, report intense pressure from the highest echelons of the NRC staff to either gloss over a broad range of serious violations of federal regulations at Waterford and/or

forewarn LP&L top management of the specific nature of the allegations against the company and whatever supporting evidence task force investigators have developed. Such forewarning, technically called "pre-notification," has been strictly banned by NRC regulations, internal policy and, some sources believe, the Atomic Energy Act, the federal law governing NRC operations. These two points spurred an intense struggle within the Waterford task force, with roughly half the task force members bucking their superiors in Washington and refusing to follow the pre-notification orders, something they are said to believe would involve them in criminal acts.

There has been, additionally, very intense pressure on members of the task force to wrap up all their work and have their report ready for publication by June 8 — a chore close observers of the NRC and NRC insiders are calling "unheard of." Reports are normally filed roughly four to six weeks after a short, routine inspection. Reports for longer, more complex inspections frequently take months to write and file. One of the implications of the rush to publish the task force's findings, according to Billie Garde of the Government Accountability Project (GAP) in Washington, D.C., is that the conclusions may already be written before the findings are even in. GAP is a public interest law firm specializing in the nuclear power industry. The organization is currently conducting its own investigation into Waterford's problems.

Task force members, apparently under orders from on high, packed their bags and went home for good on May 25, even though the list of 39 allegations they had in hand when they arrived had grown to more than 350. According to *Gambit's* sources, task force team leaders have been ordered to have their report finished by June 8 in order to justify allowing fuel loading at Waterford either by that weekend or the following weekend. The exact reason for the early June fuel loading push is not clear, but *Gambit's* sources say the pressure to meet that deadline is "very intense."

One of the toughest problems faced by the NRC upper management faction pushing the early or mid-June fuel load date, according to *Gambit's* sources, is this: how can they justify allowing LP&L to load fuel and proceed towards full power licensing at Waterford when the problems there are described by some NRC inspectors as "far more serious" than the problems found at Zimmer and Midlands, plants which were shut down because of the breakdowns in their quality assurance programs. The flaws in Waterford's QA program uncovered by the task force are reportedly far worse than anything found at either Zimmer or Midlands, both of which have since been cancelled. A large number of Waterford's operating systems, perhaps as many as ten, will reportedly require 100% re-inspections — a time consuming and laborious process that *Gambit's* sources say will undoubtedly require at least some additional re-work as well.

An additional hurdle to be cleared before fuel loading can be reasonably justified, according to *Gambit's* sources, is the fundamental question of the integrity and competence of LP&L's management of the plant, not only currently but throughout the course of its construction. Sources close to task force investigators looking into allegations of massive and systematic records falsification in certain critical operating systems say they have

confirmed the charges in at least 80% of the cases. Beyond that, task force investigators are said to believe that they can prove that LP&L officials filed at least eight material false statements with them when the utility provided written responses to the original 39 allegations the task force presented to the company when the investigation began.

Some investigators are reportedly convinced that records were being falsified and manufactured at Waterford even while the task force investigation was proceeding. Task force inspectors would frequently search through files looking for certain records, come up empty and return to their offices. "Thirty minutes or an hour later," one source said with perhaps a touch of hyperbole, "here comes someone from LP&L delivering the missing documents. Sometimes the ink wasn't even dry yet."

Another signal that people at the top of the NRC are pushing hard to put the fix in at Waterford is the form the task force's report will take. Normal practice in a situation like this, according to Billie Garde, would require that the task force report be in the form of an inspection report, a key technical phrase. If presented as an inspection report, the document would require formal "findings" which the utility is required to respond to in writing within a specified period of time. An inspection report would also provide a mechanism for levying civil penalties against LP&L for each reported violation above a certain level of severity, a level transgressed by LP&L repeatedly at Waterford, according to *Gambit's* sources. (Despite all these machinations, apparently designed to speed Waterford towards the earliest possible operation, NRC Region IV officials are said to believe that LP&L will end up being slapped with a "big fine," something in excess of \$100,000 and perhaps several hundred thousand, over Waterford's problems.)

Instead of conducting the task force investigation as an inspection, however, top echelon NRC officials issued an order when the investigation was more than half complete directing the task force coordinator and team leaders to write their reports as a supplemental safety evaluation report (SSER), a far less stringent technical form. The SSER form by-passes the requirement to report findings, does not require the utility to file a formal response and does not provide a legally binding mechanism for the levying of civil penalties for serious violations. The order to shift the task force report's form from an inspection to an SSER was reportedly given after some task force investigators refused to disclose their findings to LP&L executives in defiance of direct orders to do so from above. The argument was said to have been made then that if the task force effort was pursued as a supplemental safety evaluation instead of as an inspection there would be no violation of NRC procedures or regulations if task force investigators disclosed their findings to LP&L's management.

When some task force investigators reportedly continued to refuse to tell LP&L what they were uncovering, the executive director of the NRC staff, William J. Dircks, issued a staff memorandum on May 2 reversing the NRC's historical stance on pre-notification or early disclosure. Dircks' memo outlined a new NRC policy directing staff inspectors and investigators to turn over all allegations they received to the utility against whom the allegation is made, except under certain specified conditions. According to the new Dircks policy, the utility would then investigate the charges and report back to the NRC — subject to possible NRC verification. Some mem-

bers of the Waterford task force, according to *Gambit's* sources, have continued to refuse to disclose their findings to LP&L. A member of Dircks' staff who helped formulate the May 2, Tom Rheem, denied that the new policy would allow utilities to cover their tracks when charged with violations of NRC rules and regs.

These issues are all reflections of a sharp policy dispute within the NRC and congress over the future course of U.S. nuclear power regulation. Although Waterford is only one of several "near term" nukes whose future turns on the outcome of this high-stakes bureaucratic and political struggle, there is gathering evidence that what happens here may become the model for other seriously troubled plants — a possibility that has some close observers deeply concerned. The Waterford task force is the largest such effort ever organized by the NRC. While it has been presented as a massive and unprecedented NRC investigation into what may be the most seriously flawed nuclear construction project yet uncovered, some *Gambit* sources believe that there is a major effort under way to transmute the process through executive fiat into campaign to usher Waterford into full power operation long before it is safe to do so.

Two of those critics are GAP's Billie Garde and Gary Groesch of Citizens for Safe Energy, the New Orleans-based intervenor group that is seeking to stop Waterford in its tracks on the grounds that it is too dangerous to operate. Groesch and Garde expect to file a motion with the NRC in the near future questioning the integrity and competence of LP&L's management to safely operate the plant. A similar motion was honored earlier this month by the Atomic Safety and Licensing Appeals Board when the operators of Three Mile Island sought a permit to restart one of their reactors. The Appeals Board ruled in that case that TMI's operators, several of whose executives were convicted of criminal falsification of safety-related records, had demonstrated so little competence and integrity that they could not be trusted to protect the public health and safety in the operation of a nuclear power plant. Groesch and Garde will apparently contend that LP&L has demonstrated a similar lack of competence and integrity.

The NRC's third major investigation into Waterford, being conducted by a ten person team from the Office of Investigations, will furnish Groesch and Garde with an enormous amount of ammunition to make that argument when their report is finally published, according to *Gambit's* sources. The Office of Investigations is responsible for probing allegations made to the NRC that have possible criminal implications. They are currently conducting at least six investigations into Waterford which are not expected to be complete for several months. Sources close to that investigation claim that they have already collected a bagful of smoking guns regarding the systematic falsification of safety-related records at Waterford. Top level NRC officials in Washington have reportedly been warned by Waterford's OI investigators that if they allow LP&L to load fuel according to the schedule currently being pushed, that they will wind up being seriously embarrassed when the OI report is finally published.

Louisiana Attorney General Billy Guste, meanwhile, has opened his own investigation into the NRC's doings at Waterford. Guste's investigators notified NRC officials on May 25th of their interest in the case, putting them on notice that where applicable the laws of Louisiana may be brought to bear on their conduct at Waterford.



**LOUISIANA**  
POWER & LIGHT

317 BARONNE STREET  
NEW ORLEANS, LOUISIANA

P.O. BOX 60340

70160

• (504) 595-2204

August 27, 1984

J.M. CAIN  
President and  
Chief Executive Officer

W3B84-0475

Director of Nuclear Reactor Regulation  
ATTN: Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

SUBJECT: Waterford 3 SES  
Partial Response to Items  
from Waterford Review Team

REFERENCES: 1) Letter, D.G. Eisenhut to J.M. Cain,  
"Waterford 3 Review," dated June 13, 1984  
2) Letter W3B84-0473, R.S. Leddick to D.G. Eisenhut,  
"Program Plan for Resolution of Pre-Licensing  
Issues" dated August 20, 1984

Dear Mr. Eisenhut:

The purpose of this letter is to submit Louisiana Power & Light's responses to issues 5, 7, and 21 as set forth in your June 13, 1984 letter (Reference 1). The responses follow the approach set forth in Attachment 1 to the Program Plan sent to you by LP&L on August 20, 1984 (Reference 2).

The responses have been reviewed and verified by LP&L QA in accordance with procedure QASP 19-13. The designated subcommittee of the Waterford Safety Review Committee also has reviewed the adequacy of the responses for resolving the issues raised. The subcommittee scope of responsibility does not include independent validation of the facts.

The Task Force has indicated by separate correspondence (enclosed) that it is satisfied with the logic of the responses, however, they have not yet completed their independent validation of the facts. The Task Force has committed to notifying me and the NRC immediately should they find significant deviations in the course of their validation. In the event of such notification, LP&L will amend individual responses as may be necessary.

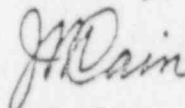
~~8409010047~~

Mr. Darrell G. Eisenhut, Director  
W3B84-0475  
August 27, 1984

Page 2

We request that you commence actions you deem necessary to lead to the resolution of these individual issues. Responses to the remaining issues will be submitted as they are prepared. We have revised our schedule for these submittals and currently expect to submit the majority of the remaining responses by mid-September.

Sincerely,

A handwritten signature in cursive script, appearing to read "J.M. Cain".

J.M. Cain

JMC:DA:pbs

Attachments



Mr. Darrell G. Eisenhut, Director  
W3B84-0475  
August 27, 1984

Page 3

cc: Mr. R.S. Leddick

Mr. D.E. Dobson

Mr. R.F. Burski

Mr. K.W. Cook

Mr. T.F. Gerrets

Mr. A.S. Lockhart

Mr. R.P. Barkhurst

Mr. L. Constable  
USNRC - Waterford 3

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

Mr. D. Crutchfield  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Mr. G. Knighton, Chief  
Licensing Branch No. 3  
Division of Licensing  
Washington, D.C. 20555

Mr. M. Peranich  
Waterford 3 Investigation and  
Evaluation Inquiry Report Team  
Leader  
4340 E.W. Hwy. MS-EWS-358  
Bethesda, MD 20114

Mr. D. Thatcher  
Waterford 3 Instrumentation & Control  
Leader  
5650 Nicholson Ln.  
Rockville, MD

Mr. L. Shao  
Waterford 3 Civil/Structure Team  
Leader  
5650 Nicholson Ln.  
Rockville, MD

Mr. J. Harrison  
Waterford 3 QA Team Leader  
Region III  
700 Roosevelt Rd.  
Glen Ellyn, IL 60137

Mr. J.E. Gagliardo  
Director Of Waterford 3 Task  
Force  
Region IV  
611 Ryan Plaza Suite 1000  
Arlington, TX 76011

Mr. S. Levine  
NUS Corporation  
910 Clopper Road  
Gaithersburg, MD 20878

Mr. R.L. Ferguson  
UNC Nuclear Industries  
P.O. Box 490  
Richland, WA 99352

Mr. L.L. Humphreys  
UNC Nuclear Industries  
1200 Jadwin, Suite 425  
Richland, WA 99352

Mr. G. Charnoff  
Shaw, Pittman, Potts &  
Trowbridge  
1800 M. St. N.W.  
Washington, D.C. 20555

Dr. J. Hendrie  
50 Bellport Lane  
Bellport, NY 11713

Mr. R. Douglass  
Baltimore Gas & Electric  
8013 Ft. Smallwood Road  
Baltimore, MD 21226

Mr. M.K. Yates, Project Manager  
Ebasco Services, Inc.  
Two World Trade Center, 80th  
New York, NY 10048

Mr. R. Christesen, President  
Ebasco Services, Inc.  
Two World Trade Center  
New York, NY 10048



910 CLIPPER ROAD  
THURSDAY, MARYLAND 20378-1369  
11 228-6000

NUS-W3-A710  
August 23, 1984

Mr. J. M. Cain  
President and Chief Executive Officer  
Louisiana Power and Light Company  
317 Barrone Street  
New Orleans, Louisiana 70160

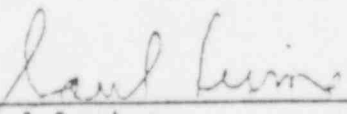
Reference: Letter from D. G. Eisenhut, Director, Division of Licensing,  
USNRC to J. M. Cain, President and Chief Executive Officer,  
LP&L, Waterford 3 Review, June 13, 1984

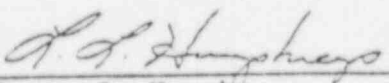
Dear Mr. Cain:

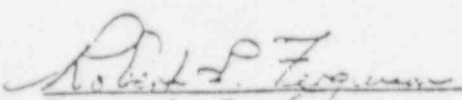
We understand that you plan to submit LP&L responses to the NRC covering  
Issues 5, 7 and 21 of the referenced letter.

The Task Force has no objection to this course of action. We have studied  
these issues and find the logic stated in the LP&L responses to be adequate.  
You should note that the Task Force has not yet completed its independent  
validation of the facts presented in the responses. We will notify you and  
the NRC immediately if we find significant deviations in the course of our  
continuing validation effort. Of course, as you know, our work on all 23  
issues and their collective significance is continuing and will culminate  
in a formal report to you.

Sincerely,

  
Saul Levine  
Vice President and  
Group Executive  
Consulting Group, NUS

  
Larry L. Humphreys  
President  
UNC Operations Division

  
Robert L. Ferguson  
Chairman  
UNC Nuclear Industries

SL/cn

RESPONSE

ITEM NO.: 21

TITLE: LP&L QA Construction System Status and Transfer Reviews

NRC DESCRIPTION OF CONCERN:

The Inquiry Team assessment of the Ebasco QA disposition of LP&L QA Construction documentation and walk-through hardware findings for a sample of the sixty-seven systems transferred to LP&L operations resulted in NRC questions on the adequacy of Ebasco and LP&L QA Construction disposition of those findings. As a result of the NRC questions LP&L and Ebasco QA initiated a review to ensure that all LP&L QA Construction findings were adequately dispositioned. Ebasco QA had identified 15 systems or subsystems (Nos. 18-3, 36-1, 36-3, 43B, 43B9, 46C, 46E, 46H, 55A, 59, 69B, 71B2, 72A and 91E) where the LP&L findings may not have been properly dispositioned during the transfer of these systems to LP&L operations.

Based on the above, LP&L is requested to complete the review of all significant LP&L status and transfer review findings, such as undersized welds and other hardware walk-through and documentation findings. This review should ensure that these findings have been properly closed out or identified to LP&L operations for their closeout. For any LP&L open findings not properly identified on the status or transfer letters to LP&L operations, LP&L should determine whether this condition adversely affected the testing conducted for those systems.

DISCUSSION:

LP&L has completed its review of Construction QA system documentation and walkthrough hardware comments to ensure that these comments have been adequately dispositioned. This review included both "Status" and "Transfer" comments. All significant comments have been properly closed out or identified to LP&L Plant Staff on the Master Tracking System (MTS).

The term "Status" refers to the point at which a Startup System (SUS) becomes the responsibility of LP&L Startup. The system may not be 100% complete, but it is considered complete enough to facilitate testing by LP&L Startup. The LP&L Construction QA Status review determines whether or not the documentation accurately reflects the status of the system and whether the documentation is acceptable. The organizational elements involved in this phase are Construction, QA and Startup. Per the established startup program, Plant Staff is only involved in the Transfer phase.

The term "Transfer" refers to the conveyance of jurisdiction of a SUS from LP&L Startup to Plant Staff following construction completion and preoperational testing. The LP&L Construction QA final review and acceptance of the system documentation is a prerequisite to acceptance of the system by Plant Staff and is documented in a Construction QA letter to LP&L Startup for inclusion in the system transfer package.



During the transfer review process, comments generated by LP&L Construction QA are returned to Ebasco QA for resolution. The majority of the comments pertain to documentation deficiencies. However, any comments that are hardware impacting (i.e., requiring rework or engineering evaluation) are processed using Deficiency Notices (DN's) or Nonconformance Reports (NCR's) and are identified and tracked by the Master Tracking System (MTS) until they are formally closed. If deficiencies are still open when the LP&L Construction QA Transfer letter is issued to LP&L Startup, they are referenced in the letter. This is done in order to allow the Plant Staff to make informed decisions regarding acceptance of system jurisdiction and to assure continuity of deficiency awareness through the transfer process. The Construction QA letter is updated by the Startup Transfer Group to the time the system is submitted to Plant Staff for transfer and is included in the transfer package.

Under the above process, resolution of all significant LP&L Construction QA comments should be accomplished prior to transfer of each system.

Comments not impacting on hardware need not be resolved prior to transfer. At the time of the Inquiry Team assessment, LP&L and Ebasco were in the midst of the transfer review process. The listing of 15 systems given to the NRC during the Inquiry Team assessment included those systems preliminarily identified as having LP&L QA comments to which Ebasco had not yet responded. This listing should be corrected as follows: System 43B9 should be system 46B, system 69B should be system 60B, and system 56A was left out and should be added. Further investigation revealed that systems 46C and 72A had been adequately responded to by Ebasco QA. The remaining 13 systems had outstanding comments. These have been responded to and have been accepted by LP&L QA. Of the 13 systems, 7 were classified as "accepted with comments". This means that LP&L QA accepted the system with comments that were not considered to be hardware impacting and, therefore, need not have been responded to by Ebasco QA prior to system transfer. Of the remaining 6 systems, 46E had not yet been submitted for transfer. Three other systems (43B, 36-1 and 36-3), which had comments concerning undersized welds, were submitted for transfer on the assumption that the referenced welds had been reinspected and were accepted under the resolution of SCD 74 (which addresses such undersized welds generically). The referenced welds have now been reinspected and are acceptable. The last two systems (46B and 59) of the six were transferred because the comments were resolved prior to the LP&L Construction QA letter being written. The formal response from Ebasco had not been transmitted.

LP&L has performed an overall review of hardware and software comments generated during Status and Transfer of safety-related systems. This review of comments was to determine if there were generic implications or significant trends. There were no generic problems or trends identified other than those previously processed in accordance with Waterford-3 Site QA Program requirements (e.g. SCDs 57, 60 and 74). This review is documented in the File Memo W3K84-1148, dated 5/14/84.

Ebasco QA conducted a surveillance (SMR-84-6-1, dated 6/20/84) of their Status files which verified that Ebasco QA had submitted complete responses to all LP&L QA comments. No additional outstanding correspondence was found during this review. This was confirmed by LP&L QA.

In conclusion, LP&L found no significant open comments that were not included in the Status or Transfer letters to LP&L Startup which would have adversely affected the testing conducted for these systems. In addition, no significant comments were found which were not resolved or identified on the MTS per existing procedure at the time it was recommended to the Plant Manager that the SUS be accepted. 16 E 17-E

#### CAUSE:

The NRC was concerned that Construction QA comments were not being resolved in a timely fashion. The process of closing status comments was in progress at the time of the inquiry team assessment, but had not been completed.

In all cases except for undersized welds, resolution in fact was not untimely. In the case concerning undersized welds, comment responses arguably should have been provided prior to transfer. Comment responses on undersized welds were not required prior to transfer due to a misunderstanding as to the need for system specific weld reinspection because it was believed that these welds were covered by SCD-74.

#### GENERIC IMPLICATIONS:

None.

#### SAFETY SIGNIFICANCE:

A review by LP&L Startup and Plant Staff of the comments, other than those processed as DNs or NCRs, for the systems listed in the NRC concern determined that none were significant or would have impacted testing or system operation. 23 E

#### CORRECTIVE ACTION PLAN/SCHEDULE:

As shown above, the Status and Transfer reviews have been satisfactorily closed-out. Furthermore, the Plant Staff will be promptly notified if and when any significant problems are subsequently identified on a system. The identification and notification will be accomplished via the CIWA (Condition Identification Work Authorization) process. 24 E

#### ATTACHMENTS:

- 1) Disposition of System Status and Transfer Reviews
- 2) Description of System Status and Transfer Reviews

#### REFERENCES:

All letters referenced in Attachment 1.

## ATTACHMENT 1

DISPOSITION OF SYSTEM STATUS AND TRANSFER REVIEWS\*

<u>JS</u>	<u>LP&amp;L COMMENTS</u>	<u>EBASCO RESPONSE</u>	<u>LP&amp;L ACCEPTANCE</u>
18-3	W3K-83-0648 (5/18/83)	W3-QAIRC-0572 (6/20/83)	W3K84-0853 (6/22/83)
		W3-QAIRC-1405 (5/9/84)	W3K84-1271 (5/28/84)
36-1	W3K-83-0197 (2/17/83)	W3-QAIRC-0342 (2/24/83)	W3K84-1654 (7/19/84)
	<i>W3K-83-0197</i>	W3-QAIRC-1439 (6/7/84) ✓	W3K84-1654 (7/19/84) ✓
		W3-QAIRC-1439 S1 (7/19/84) ✓	W3K84-1654 (7/19/84) ✓
36-3	W3K-82-183 (2/16/83)	W3-QAIRC-0339 (2/22/83)	W3K84-1560 (7/5/84) —
	<i>W3K-82-183</i>	W3-QAIRC-1440 (6/7/84) ✓	W3K84-1560 (7/5/84) —
	W3K-83-210 (2/18/83)	W3-QAIRC-1448 (6/13/84)	W3K84-1560 (7/5/84) ✓
43B	W3K-83-0195 (2/17/83)	W3-QAIRC-0346 (2/25/83)	W3K84-1561 (7/5/84) —
	<i>W3K-83-0195</i>	W3-QAIRC-1441 (6/7/84) ✓	W3K84-1561 (7/5/84) —
46B	W3K-83-0613 (5/10/83)	W3-QAIRC-0556 (6/14/83)	W3K84-1250 (6/4/84)
	<i>stated as used for transfer, formal before follow-up</i>	W3-QAIRC-1450 (6/17/84)	W3K84-1250 (6/4/84)
	W3K-83-210 (2/18/83)	W3-QAIRC-1396 (5/4/84)	W3K84-1250 (6/4/84)
46C	W3K-83-0196 (2/17/83)	W3-QAIRC-0348 (2/28/83)	W3K84-1562 (7/6/84)
		W3-QAIRC-1399 (5/4/84)	W3K84-1562 (7/6/84)
46E	W3K-83-728 (5/31/83)	W3-QAIRC-0544 (6/10/83)	W3K84-1599 (7/12/84)
	<i>stated as not submitted for transfer.</i>	Q.S.E.-1001 (4/11/84)	None Required
		W3-QA-28118 (4/17/84)	W3K84-1599 (7/12/84)
	W3K-83-0342 (3/17/83)	W3-QAIRC-0436 (4/14/83)	W3K84-1599 (7/12/84)
		W3-QAIRC-1372 (4/17/84)	W3K84-1599 (7/12/84)
	W3K-83-0343 (3/18/83)	W3-QAIRC-1442 (6/7/84) ✓	W3K84-1599 (7/12/84)
46H	W3K-83-0450 (4/8/83)	W3-QAIRC-0483 (5/13/83)	W3K84-1453 (6/22/84)
	<i>not hardware</i>	W3-QAIRC-0483 S1 (6/21/84) ✓	W3K84-1453 (6/22/84)
A	W3K-83-0688 (5/26/83)	W3-QAIRC-0545 (6/10/83)	W3K84-0769 (4/2/84)
	<i>not hardware</i>	W3-QAIRC-1392 (5/4/84)	W3K84-1378 (6/7/84)

ATTACHMENT 1  
(continued)

<u>JS</u>	<u>LP&amp;L COMMENTS</u>	<u>EBASCO RESPONSE</u>	<u>LP&amp;L ACCEPTANCE</u>
56A	W3K-83-0477 (4/11/83)	W3-QAIRC-0480 (5/12/83)	W3K84-1563 (7/5/84)
		W3-QAIRC-1400 (5/4/84)	W3K84-1563 (7/5/84)
59	W3K-83-1353 (9/14/83)	W3-QAIRC-1403 (5/4/84)	W3K84-1421 (6/15/84)
60B	W3K-83-1936 (12/7/83)	W3-QAIRC-1395 (5/4/84)	W3K84-1564 (7/6/84)
71B2	W3K-83-1140 (8/5/83)	W3-QAIRC-1393 (5/4/84)	W3K84-1565 (7/6/84)
72A	W3K-82-0733 (11/2/82)	W3-QAIRC-0192 (12/1/82)	W3K84-1377 (6/12/84)
91E	W3K-83-1859 (11/29/83)	W3-QAIRC-1112 (1/9/84)	W3K84-1568 (7/6/84)
		W3-QAIRC-1112 S1 (5/9/84)	W3K84-1568 (7/6/84)

\* This listing gives the letter numbers with issuance dates in parenthesis.

ATTACHMENT 2  
DESCRIPTION OF SYSTEM US AND TRANSFER REVIEWS

SUS	LP&L Letter	EBASCO Letter	INCOMPLETE RESPONSES Finding	Resolution/Answer
Walkdown 18-3	W3K-83-648 (5/18/83)	W3-QAIRC-1405 (5/9/84)	1. FW-5,6,18 and 19 not per As-built. 2. 22" separation on tubing instead of 24". 3. Flareless connectors not right.	1. Nonproblem per ASP-IV-79 2. FCR-ICP-672 written to accept this condition. 3. Reworked 12/22/83 per CIWA83E165
Walkdown 36-1	W3K-83-197 (2/17/83)	W3-QAIRC-1439 (6/7/84)	T-B undersized welds.	Generic problem addressed under SCD 74 at time of Finding.
Walkdown 36-3	W3K-82-183 (2/16/83)	W3-QAIRC-1440 (6/7/83)	1/4" fillet welds-potentially undersized.	Non-problem. This is acceptable per the ASME Code.
Walkdown 36-3	W3K-83-210 (2/18/83)	W3-QAIRC-1448 (6/13/84)	T-B undersized welds.	Generic problem addressed under SCD 74 at time of Finding.
Walkdown 43B	W3K-83-195 (2/17/83)	W3-QAIRC-1441 (6/7/84)	T-B undersized welds.	Generic problem addressed under SCD 74 at time of Finding.
Review 46B	W3K-83-613 (5/10/83)	W3-QAIRC-1450 (6/17/84)	AS-IC-1127-No spool number.	Line number wrong. Line was AC-IC-1177 and Iso. was revised to add spool number.
Walkdown 46B	W3K-83-557 (5/3/83)	W3-QAIRC-1396 (5/4/84)	OCR 1311 and 1223 had tubing with incorrect slope.	Tubing reworked by Mercury at time of Finding.
46C	W3K-83-196 (2/17/83)	W3-QAIRC-348 (2/28/83)	Non-problem. All Findings were responded to in Letter W3-QAIRC-348 (2/28/83).	
Walkdown 46E	W3K-83-728 (5/31/83)	W3-QA-28118 (4/17/84)	1. Loose Clamps. 2. High points in tubing. 3. Valve tag incorrect.	Findings 1 and 2 were added to the Area Walkdown Punchlists. 3. Reinspection found valve to be correctly tagged.
Review 46E	W3K-83-342 (3/17/83)	W3-QAIRC-1372 (4/17/84)	Various document deficiencies.	All deficiencies resolved prior to Ebasco issuing QA Transfer Letter W3-QAIRC-364RR on 11/3/83 for T-B.
Walkdown 46E	W3K-83-343 (3/18/83)	W3-QAIRC-1442 (6/7/84)	T-B undersized welds and various other problems.	SCD-74 and NCR-7680



ATTACHMENT 2  
(continued)

SUS	LP&L Letter	EBASCO Letter	INCOMPLETE RESPONSES Finding	Resolution/Answer
Review 46H	W3K-83-450 (4/8/83)	W3-QAIRC-483S1 (6/21/84)	Wrong washers installed.	Ebasco rework forms were initiated at time of Finding. Rework was complete on 5/25/83.
Walkdown 55A	W3K-83-688 (5/26/83)	W3-QAIRC-1392 (5/6/84)	Various tubing problems.	W3-NCR-7147 and 7146 were written on 10/12/83 to address these problems. Both were closed on 11/7/83.
Walkdown 56A	W3K-83-477 (4/14/83)	W3-QAIRC-1400 (5/4/84)	1. Coupling not shown on Iso. 2. SW6R1 to 90° El. not flange.	1. Iso. revised per FCR-MP-219. 2. Correct. FW6R2 was to flange.
Walkdown 59	W3K-83-1353 (9/14/83)	W3-QAIRC-1403 (5/4/84)	1. FW not per CIWA814747. 2. No documentation for CIWAs 82A705 and 825039.	1. DN-SQ-745 (written 9/15/83) and CIWA83C259 were written at time of Finding to rework the FW. 2. CIWA82A705 was part of NCR-4552 and CIWA825039 was Non-Safety and in the CIWA Vault.
Review 60B	W3K-83-1936 (12/7/83)	W3-QAIRC-1395 (5/4/84)	OCR 2036 and 2037 had open 9.1s and 9.2s.	OCR-2036 was resolved 5/24/83. OCR-2037 was resolved 11/12/83.
Walkdown 71B2	W3K-83-1140 (8/5/83)	W3-QAIRC (5/4/84)	Various	NCR-7111 was written 10/6/83 to address Findings. L-CIWA004871 was written to perform rework. NCR closed 3/27/84.
72A	W3K-82-733 (11/2/82)	W3-QAIRC-192 (12/1/82)	Non-problem. All Findings were responded to in Letter W3-QAIRC-192 (12/1/82).	
Review 91E	W3K-83-1859 (11/29/83)	W3-QAIRC-1112S1 (5/9/84)	Various F&M documentation deficiencies.	Documentation problems were resolved mainly by obtaining additional information from F&M.

*INSP. REPORT File*

Letter for Robert DeYoung from Robert Tedesco  
December 11, 1973

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION: WATERFORD STEAM ELECTRIC  
STATION, UNIT 3

Memorandum for R. L. Baer from Walter Haass  
October 19, 1978

SUBJECT: ACCEPTANCE REVIEW: WATERFORD STEAM ELECTRIC STATION,  
QUALITY ASSURANCE, CONDUCT OF OPERATIONS, AND INITIAL  
PLANT REST PROGRAMS

Letter for John Collins, RIV from R. S. Leddick  
November 21, 1983

SUBJECT: WATERFORD SES UNIT NO. 3

Letter for John Collins, RIV  
April 8, 1983

SUBJECT: Waterford SES UNIT NO. 3

Letter for Jim Forte  
April 4, 1983

Letter for John Collins  
April 8, 1983

Memorandum for Richard D. DeYoung from James K. Joosten  
June 8, 1983

SUBJECT: WATERFORD QA

Memorandum for Mark Peranich from James Snizek  
June 21, 1-83

SUBJECT: WATERFORD QA - ALLEGATIONS

Letter for Ron Ridenhour from J. M. Felton  
July 28, 1983

SUBJECT: RESPONSE TO FOIA-83-226

Letter for James Cain from Richard DeYoung  
August 4, 1983

Note to Files

September 20, 1983

SUBJECT: AUGUST 25, 1983 MEETING WITH LOUISIANA POWER AND LIGHT  
(WATERFORD)

Letter for Richard DeYoung from R. Sheddick  
September 29, 1983

SUBJECT: WATERFORD 3 SES  
DOCKET NO. 50-382

Preliminary Review of LP&L Response

Regulatory Information Distribution System (RIDS)

Memorandum (Note for M. Peranich from R. Shewmaker  
July 12, 1983  
SUBJECT: ADDITIONAL INFORMATION

Letter for James Cain from Richard DeYoung  
January 16, 1984

Regulatory Information Distribution System (RIDS)

Memorandum for Mark Peranich from L. C. Shao  
June 4, 1984  
SUBJECT: EVALUATION OF UNDERSIZED WELDS IN WATERFORD 3

Note for Dennis Crutchfield from M. Peranich  
SUBJECT: WATERFORD INQUIRY TEAM INSPECTION REPORT

Notice of Significant Licensee Meeting  
July 17, 1984

Inter-Office Correspondence  
August 1, 1984  
SUBJECT: WATERFORD SES UNIT NO. 3

ITEM 21. FILE

Ebasco list - 15 systems

Safety Related System Transfer Status

NCR W3-F7

Constable to Peranich - (3 pages) - System Transfer to Plant Staff

LP&L Organization Chart - March 26, 1984

Memo, J. M. Cain to D. G. Eisenhut, August 27, 1984