



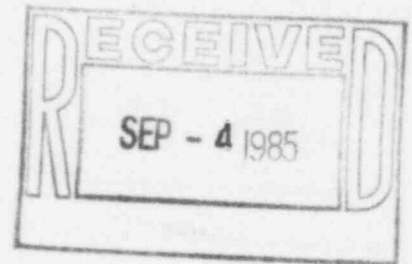
LOUISIANA
POWER & LIGHT

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September 3, 1985

W3P85-1470
A4.05

Mr. Robert D. Martin
Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011



Dear Mr. Martin:

Subject: Waterford 3 SES
Docket No. 50-382
License No. NPF-38
NRC Inspection Report 85-16

Attached are the Louisiana Power & Light Company responses to Violations numbered 8516-01, 8516-02 and 8516-03 which were cited in the subject NRC Inspection Report.

These responses are submitted under affidavit as required by Section 182 of the Atomic Energy Act of 1954, as amended.

If you have any questions on the response to the violations, please contact G.E. Wuller, Onsite Licensing, at (504) 464-3499.

Very truly yours,

K.W. Cook
Nuclear Support & Licensing Manager

KWC:GEW:sms

cc: NRC, Director, Office of I&E
G.W. Knighton, NRC-NRR
J.H. Wilson, NRC-NRR
NRC Resident Inspectors Office
B.W. Churchill
W.M. Stevenson

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LP&L Response to Violations in Inspection Report No. 85-16

1. VIOLATION NO. 8516-01

Control of Design Changes

Criterion III of 10 CFR 50, Appendix B, requires that the licensee establish measures for the identification and control of design interfaces and for coordination among participating design organizations. These measures shall include the establishment of procedures among participating design organizations for the review, approval, release, distribution, and revision of documents involving design interfaces.

LP&L Administrative Procedure PE-02-006, Revision 5, "Station Modifications," paragraph 5.13.1.4, requires that operational procedures and operational training be completed prior to considering the modification packages fully implemented.

Contrary to the above, on April 10, 1985, the NRC inspector noted that LP&L Off-Normal Operating Procedure OP-901-022, Revision 1, "High Activity in Component Cooling Water Systems," had not been revised to reflect the modification installed under Station Modification Package (SMP) 760. This SMP changed the automatic isolation of component cooling water (CCW) to the reactor coolant pump (RCP) integral seal cooler from high pressure to high temperature. In addition, the modification provided the operators with the means to reopen, from the control room, a closed CCW isolation valve. This modification had been implemented by March 3, 1985.

This is a Severity Level IV violation (50-382/8516-01).

Response To The Violation

(1) Reason for Violation

The lack of thoroughness for procedure review and failure to follow procedures are the reasons for the violation.

(2) Corrective Actions Taken and Results Achieved

LP&L Off-Normal Operating Procedure OP-901-022, High Activity in Component Cooling Water System, was modified to reflect the changes caused by Station Modification 760. The procedure reflects automatic isolation to occur on high temperature. The procedure change was approved July 16, 1985. Appropriate operations personnel have been instructed to be more thorough in their review of procedure updates.

(3) Corrective Actions That Will Be Taken

No further action is being considered.

(4) Date When Full Compliance Will Be Achieved

Compliance was achieved on July 16, 1985.

2. VIOLATION NO. 8516-02

Failure to Follow Procedure

Criterion V of 10 CFR 50, Appendix B, requires in part that activities affecting quality be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

LP&L Operating Procedure OP-7-001, Revision 4, "Boron Management System," paragraph 6.24.7 requires that when the boric acid concentrator temperature decreases to 200°F, as indicated on MC-ITIC-6381A(B), close the steam chest vent valve, BM 435 A(B) by using manual adjustment knob on Vent Valve Controller BM-ITIC-6403A(B).

Contrary to the above, after shutting down the boric acid concentrator (BAC) on March 29, 1985, the auxiliary operator failed to close boron management valve BM 435 A(B). This valve is only opened during periods of BMC operation to allow venting of noncondensable gases from the BAC steam chest to the radioactive system collection header. On April 3, 1985, a flow transient in the chemical volume control system (CVCS) letdown line caused a pressure spike downstream of the letdown orifice valves. CVCS relief valve CVC 115 opened as required reducing the pressure below the CVC 115 set point; however, the valve failed to properly insert resulting in approximately 1 gpm reactor coolant system (RCS) leakage to the radioactive system collection header. The header was physically aligned to one of the holdup tanks. The existing backpressure in the tank forced the RCS leakage into the BAC steam chest. The contaminated water then flowed to the gland seal leakoff tank (condensate return unit) and back into the condenser. From the condenser, the contaminated condensate made its way into the polisher and steam generator via the normal secondary steam flow path.

This is a Severity IV violation (50-382/8516-02).

Response To The Violation

(1) Reason for Violation

Operator error in failure to follow procedure is the reason for the violation.

(2) Corrective Actions Taken and Results Achieved

Station Modification No. 461 was implemented on August 7, 1985. This modification removed the cross connection between the Boric Acid Concentrator Auxiliary Steam and the Holdup Tank Relief Header.

(3) Corrective Actions Which Will Be Taken

An Operations Department Standing Instruction was generated to emphasize the need for proper use of procedures.

(4) Date When Full Compliance Will Be Achieved

No further action is contemplated.

3. VIOLATION NO. 8516-03

Fire Protection

Criterion V of 10 CFR 50, Appendix B requires, in part, that activities affecting quality be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

LP&L Fire Protection Procedure FP-1-015, Revision 1, "Fire Protection System Impairments," paragraph 4.2, required that the shift supervisor/control room supervisor (SS/CRS) evaluate the fire impairment impact of Technical Specification and insure that applicable ACTION statements are complied with. In addition, the SS/CRS is required to complete a fire protection impairment form and note the same in index log. Paragraph 3.2 of this procedure defines an impairment as "any condition that inhibits a fire appliance from properly performing its design function due to failure of components or deviations from the design position."

Contrary to the above, on May 15, 1985, the NRC inspector noted that fire door (D-221) to Boric Acid Concentrator Room B had been removed from service and that no evidence of a completed fire appliance impairment form or that the operability of the fire detector on at least one side of the inoperable assembly had been verified.

This is a Severity Level IV violation (50-382/8516-03)

Response To The Violation

(1) Reason for Violation

Failure to strictly adhere to procedural steps is the reason for the violation.

(2) Corrective Action Taken and Results Achieved

The shift supervisor/control room supervisor were unaware of Door 221 being impaired prior to notification by the inspector. As soon as the inspector notified them, the control room personnel evaluated the fire impairment. Also, the Operations Superintendent instructed operations personnel to be more cognizant of fire doors and the subsequent impairment upon removal from service.

(3) Corrective Action That Will Be Taken

No further actions are contemplated.

(4) Date When Full Compliance Will Be Achieved

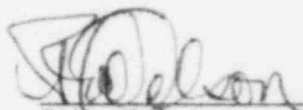
All actions are complete.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

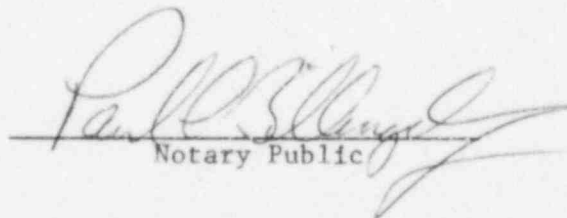
In the matter of

Louisiana Power & Light Company
Waterford 3 Steam Electric Station)
)
) Docket No. 50-382AFFIDAVIT

R.M. Nelson, being duly sworn, hereby deposes and says that he is Licensing Manager-Nuclear of Louisiana Power & Light Company; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached response to the Notice of Violation, Appendix A for NRC Inspection Report 85-16; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.

R.M. Nelson
Licensing Manager-NuclearSTATE OF LOUISIANA)
) ss
PARISH OF ST.CHARLES)

Subscribed and sworn to before me, a Notary Public in and for the Parish and State above named this 3rd day of September, 1985.


Notary PublicMy Commission expires at death.