

Appendix A

NOTICE OF VIOLATION

Louisiana Power & Light Company
Waterford Unit 3

Docket 50-382
Permit NPF-38

During an NRC inspection conducted on June 1 through July 31, 1985, two violations of NRC requirements were identified. The violations involved failure to meet operational mode requirements and failure to conduct a proper 10 CFR 50.59 review. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the violations are listed below.

A. Failure to Meet Operational Mode Requirements

Technical Specification 4.0.4 requires that "Entry into an OPERATIONAL MODE or other specified conditions shall not be made unless the surveillance requirement(s) associated with the limiting condition for operation have been performed within the stated surveillance interval or as otherwise specified.

LP&L Operating Procedure OP-10-001, Revision 4, "General Plant Operations," requires that when entering Mode 4 (hot shutdown) both emergency diesel generators be operable.

Contrary to the above, on June 11, 1985, Waterford 3 was in Mode 5 (cold shutdown) while performing Surveillance Procedure OP-903-069, "Integrated Emergency Diesel Generator/Engineered Safety Features Test." As part of the above procedure, operations personnel were attempting to prove the operability of the Emergency Diesel Generator B automatic load sequence timer. However, operations personnel did not review the test data until 1545 hours on June 20, 1985. Waterford entered Mode 4 (hot shutdown) at 1028 hours on June 20, 1985, with Emergency Diesel Generator B inoperable due to Load Block 7 being out of tolerance.

This is a Severity Level IV violation (50-382/8520-05).

B. Failure to Conduct a Proper 10 CFR 50.59 Review

Title 10 of the Code of Federal Regulations, Part 50.59 requires, in part, that the licensee shall perform and maintain a written safety evaluation which provides the basis for the determination that the changes in the facility, as described in the Safety Analysis Report (SAR), do not involve an unresolved safety question.

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Contrary to the above, on June 25, 1985, the NRC inspector noted that LP&L Operating Procedure OP-03-014, "Control Room Heating and Ventilating," provided the normal lineup of the emergency outside air intake valves which was different than the lineup described in the Final Safety Analysis Report (FSAR.) The NRC inspector found no evidence that a proper 10 CFR 50.59 review was conducted to calculate dose rates which an operator would experience if these valves had to be manually opened from outside the control room.

This is a Severity Level IV violation (50-382/8520-04).

Based on your immediate corrective actions to revise the operating procedure and performance of a 50.59 review, no response to this item of noncompliance is required.

Pursuant to the provisions of 10 CFR 2.201, Louisiana Power & Light Company is hereby required to submit to this Office, within 30 days of the date of the letter transmitting this Notice, a written statement of explanation in reply, including for each violation: (1) the reason for the violations if admitted, (2) the corrective steps which have been taken and the results achieved, (3) the corrective steps which will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,
this 29 day of Aug. , 1985