

# ROUTING AND TRANSMITTAL SLIP

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7/2/84

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Initials

Date

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2. L. Shao

1130-55

3. D. Thatcher

4. M. Perovich, IE

EWS-358

5.

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## REMARKS

Enclosed is a copy of the response received from LPL to our June 13, 1984 letter. Please let me know by Friday 6/19/84 if you have any problems or comments on their proposal.

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PDR ADOCK 05000382  
E PDR

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)

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**LOUISIANA**  
POWER & LIGHT

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J.M. CAIN  
President and  
Chief Executive Officer

June 28, 1984

W3B84-0449

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

SUBJECT: Program Plan for Resolution of Pre-Licensing Issues

REFERENCE: NRC Letter Dated June 13, 1984, Docket No. 50-382.

Dear Mr. Eisenhut:

Louisiana Power & Light has established a major program, with significant commitment of management resources, to address the issues raised in your letter to me of June 13, 1984.

I am enclosing for your information a program plan which describes the organization of our new program and the methods of approaching resolution of the issues you have raised. Key to our program is the designation of an outside, highly qualified Task Force to assist in the development of our plans for resolution and to independently assess the adequacy of the resolutions and their safety significance. The Task Force will consist of Larry L. Humphreys, President, UNC Nuclear Industries, Inc., Saul Levine, Vice President, NUS Corporation, and Robert L. Ferguson, Chairman, UNC, assisted by suitable UNC and NUS personnel.

The Task Force will independently review LP&L's proposed resolution of the matters, and will report directly to me. Formal reports to me will be simultaneously provided to you. The Task Force's charter is set out in my June 20, 1984 letter to the Task Force, enclosed.

We have also designated a top management team dedicated to resolution of the issues and administration of our program. The team is headed by Dale E. Dobson, Waterford 3 Project Manager, reporting directly to R.S. Leddick, Senior Vice President - Nuclear, and includes management involvement of the plant operational staff. I will be personally and directly overseeing the program efforts.

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Mr. Darrell G. Eisenhut  
June 28, 1984  
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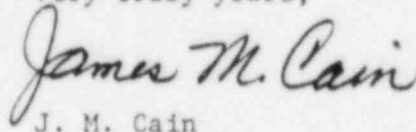
In addition, the resolution of the issues raised by your staff will be reviewed by the Waterford 3 Safety Review Committee (SRC) through a special subcommittee consisting of Kenneth W. Cook, LP&L Nuclear Support and Licensing Manager, Chairman; Joseph M. Hendrie, Consulting Engineer; Robert M. Douglass, Manager of Quality Assurance, Baltimore Gas & Electric Company; Raymond F. Burski, LP&L Engineering and Nuclear Safety Manager; and Thomas F. Gerrets, LP&L Corporate Quality Assurance Manager.

You can be assured that LP&L is totally dedicated to achieving the highest level of safety achievable in the plant, and we take very seriously the matters you have set out in your letter. I do not intend to request a fuel loading/low power license, or a full power license, until I am personally satisfied that all issues necessary for those phases of plant operation have been satisfactorily addressed to assure the public health and safety. You have my personal assurance that necessary programmatic and management changes arising from our program to resolve these issues will be immediately and effectively implemented.

The attachment to the program plan listing the LP&L approach to resolution of the individual issues has not yet been reviewed by the Task Force or the SRC, and is subject to modification as a result of reviews by those groups and your staff. The plan is intended to provide an early and high level of confidence in the successful resolution of the issues and concerns you have raised.

I welcome your comments and suggestions.

Very truly yours,

  
J. M. Cain

Enclosures:  
As Stated

cc: With Enclosure:  
See next page

Mr. Darrell G. Eisenhut, Director  
W3B84-0449  
June 28, 1984

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June 28, 1984

WATERFORD 3  
PROGRAM PLAN AND SCHEDULE

I. INTRODUCTION AND PURPOSE

This Program Plan outlines the methods by which the 23 individual issues described in the NRC letter, Docket No. 50-382, dated June 13, 1984, are to be resolved by LP&L. Further, the Plan provides a mechanism to address the cause of the issues, the generic implications and collective significance of the issues, and the programmatic and management changes designed to preclude recurrence of such issues. The Program includes the establishment of an independent Task Force to advise LP&L and evaluate LP&L's resolution of the issues, and separate review of the resolution by the Waterford 3 Safety Review Committee (SRC).

II. PROGRAM PLAN MANAGEMENT

1. The LP&L Project Manager - Nuclear is assigned responsibility for management of the overall Plan and actions outlined in paragraphs III and IV below. He will perform these tasks in a normal line management role and have access to and the support of any requisite LP&L and contractor managers and staffs on a top priority basis. He will assure effective interfaces with external groups including the SRC and the UNC/NUS Task Force described in paragraph VI below.
2. The Project Manager-Nuclear reports directly to the Senior Vice President-Nuclear, who in turn reports directly to the President and Chief Executive Officer of LP&L. Both the Senior Vice President-Nuclear and the CEO are directly and actively involved in the management of the Program.

III. RESOLUTION OF ISSUES

1. Each issue will be analyzed to determine:
  - The cause
  - The generic implication

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- The actions and schedules to correct both the specific problem and related generic concerns
  - The safety significance with respect to fuel load and low power operation, and to operation above 5% power
2. The intended manner in which each of the 23 issues are to be addressed is described in Attachment 1. It should be noted that the manner of resolution may need modification as actions necessary to resolve any related safety concerns are undertaken.

#### IV. COLLECTIVE SIGNIFICANCE AND PROGRAMMATIC CHANGES

As early as feasible in the process of formulating the information contained in paragraph III above, the LP&L Project Manager-Nuclear will:

1. assess the collective significance of the individual issues, and
2. recommend institutional or programmatic changes deemed appropriate to avoid recurrence of the types of problems underlying the issues being addressed

#### V. SAFETY REVIEW COMMITTEE

1. The Waterford 3 Safety Review Committee (SRC) has designated an SRC subcommittee to review the items outlined in paragraph III and IV above.
2. The SRC subcommittee consists of Kenneth W. Cook, LP&L Nuclear Support and Licensing Manager, Chairman; Joseph M. Hendrie, Consulting Engineer; Robert M. Douglass, Manager of Quality Assurance, Baltimore Gas and Electric Company; Raymond F. Burski, LP&L Engineering and Nuclear Safety Manager; and Thomas F. Gerrets, LP&L Corporate Quality Assurance Manager.

#### VI. INDEPENDENT ASSESSMENT

1. An independent assessment of the resolutions and determination of safety significance will be provided by a Task Force reporting directly to the CEO of LP&L. The Task Force consists of officials of UNC Nuclear Industries, Inc., Richland, Washington, and

NUS Corporation, Gaithersburg, Maryland, who will be assisted by UNC and NUS staff members, as required. The Task Force will independently assess LP&L's resolution of the issues, including the cause, generic implications and collective significance of the issues. The Task Force will also provide advice and assistance in the resolution of the issues, and will provide an independent assessment of the safety significance of the issues with respect to fuel loading and low power testing, and operation above 5% power. It will assess the adequacy of LP&L QA/QC program in light of the NRC's issues, and will recommend any institutional or programmatic changes which may be necessary to prevent recurrence of the issues.

2. The charter, identification of principals, initial functions have been formalized, as specified in Attachment 2 hereto.

#### VII. RESPONSE TO NRC

The individual issues vary considerably in both the degree of concern and complexity of resolution. Therefore, LP&L intends to forward to the NRC the proposed resolution data individually or in packages as they are completed and have undergone the degree of review specified herein. Some of the resolutions may be submitted before completion of all requisite corrective actions, which are underway or defined and scheduled for accomplishment, have been accomplished. Upon submittal, each resolution will be added as Appendix A of the Program Plan to constitute a major part of the final report.

#### VIII. SCHEDULE

Attachment 1 lists the target dates for Project Management completion of resolution data on each issue. These dates include a period of time Project Management has scheduled for completion of its review and that of by the SRC and Task Force, although these dates are difficult to predict. Target dates for development of the collective significance of the issues and recommended programmatic changes outlines in paragraph IV above are to be established by July 6, 1984.

## PROGRAM PLAN

## CURRENT ASSESSMENT OF SAFETY SIGNIFICANCE

| ISSUE & TITLE                  | DESCRIPTION OF ISSUE  | LP&L APPROACH TO RESOLUTION  | DATE | NONE FL TO 5% >5% JUSTIFICATION   |
|--------------------------------|---|--|------|---|
| 1. Inspection Personnel Issues | Verify the proper certification of site QA/QC personnel or requalify the work performed by these personnel. | <p>LP&amp;L will verify the credentials of QA managers, supervisors and personnel certifying inspectors, and auditors.</p> <p>A verification of the certification of approximately 20% of all QC inspectors is being done to assess the safety significance of the concern. A description of the certification criteria (ANSI N45.2.6-1973), as required by the Quality program, and a matrix showing certification and supporting documentation will be prepared. Further efforts, including any necessary reinspections, will be based on specific problems and root cause analyses and will be as necessary to verify the adequacy of the program and compliance with the program.</p> <p>For the QC inspectors remaining onsite, a reverification of proper certification in accordance with ANSI N45.2.6-1973 is being accomplished.</p> <p>Quality Control inspections currently being undertaken as part of other programs will be performed by QC personnel reverified as qualified under ANSI N45.2.6-1973.</p> | 7/20 | <p>A preliminary evaluation of the T-B and Mercury QC inspectors questioned by the NRC indicated they were qualified and <u>certified to perform their assigned work function.</u></p> <p>It is important to note that the inspectors for the major installers of safety related equipment and systems (e.g., Tompkins-Beckwith, Fischback &amp; Moore, Mercury, NISCO, American Bridge, J. A. Jones, and Gulf) performed no non-destructive testing (NDT). NDT was provided by GEO.</p> <p>An audit was performed on all contractors performing safety related work. An assessment of the current audit results, which do not include American Bridge and CE, indicate QC personnel were qualified and certified. Additional backup information has been requested from CE and American Bridge to complete the evaluation. The preliminary results of the audit are listed below.</p> <ol style="list-style-type: none"> <li>GEO (NDE) - 23 sampled/23 qualified</li> <li>Waldinger - 5 sampled/5 qualified</li> <li>B&amp;B - 8 sampled/8 qualified</li> <li>Sline - 15 sampled/15 qualified</li> </ol> |

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## CURRENT ASSESSMENT OF SAFETY SIGNIFICANCE

| ISSUE & TITLE                               | DESCRIPTION OF ISSUE  | LP&L APPROACH TO RESOLUTION  | DATE | NONE FL TO 5% >5% | JUSTIFICATION   |
|---|---|--|------|-------------------|---|
| 2. Missing NI Instrument Line Documentation | Verify compliance with NRC requirements for NI instrumentation installations. | LP&L will review all NI instrumentation installed during the period when class breaks were allowed (prior to April 7, 1982), identify required documentation to demonstrate correct installation and inspection, and identify the documentation available. A QA review of all safety-related NI instrumentation systems has been performed which verified that all installations were properly documented and inspected. | 7/6  |                   | To date, 90 locally mounted NI instruments have been identified as being installed prior to April 7, 1982. To date, using ASME III documentation criteria as a basis for comparison, full or partial compliance can be shown for the 12 installation at issue. Of the remaining installations 35 had no class breaks, 19 were thermocouples with no tubing, and 24 had been reclassified to N2 (i.e. not required for safe shutdown). |

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| ISSUE & TITLE                                      | DESCRIPTION OF ISSUE  | LP&L APPROACH TO RESOLUTION   | DATE | NONE | FL TO 5% > 5% | JUSTIFICATION  |
|--|---|---|------|------|---------------|--|
| 3. Instrumentation<br>Expansion Loop<br>Separation | Correct separation<br>criteria violations<br>found in system 52A and<br>provide a program for<br>review of other safety-<br>related violations and<br>take the necessary<br>corrective actions. | <p>NCR-W3-7702 covers the system 52A problems<br/>and has been dispositioned to remove the<br/>expansion loops in question thus solving<br/>the problem.</p> <p>NCR-W3-7730 was generated to track the generic<br/>concern. In order to provide some basis for<br/>determining the scope of our program, a sample<br/>of 51 instrument installations were chosen for<br/>review in area of congestion, and walkdowns of<br/>these lines were done. Thirteen violations were<br/>found out of 276 locations, although only one<br/>required rework. It was decided to perform a QC<br/>verification of all lines where the redundant<br/>tubing was run together and take the appropriate<br/>action. An interim response discussing the<br/>resolution of NCR-W3-7702 items and the status<br/>of NCR-W3-7730 reinspections will be provided<br/>as well as a schedule for completion of the<br/>reinspections.</p> | 7/13 |      |               | The walkdown to date<br>represents approximate-<br>ly 20% of the installa-<br>tions to be walked down<br>and the amount of<br>rework being identified<br>has been found to be<br>very minor (i.e. three<br>feet of tube track<br>cover). If the issue<br>had gone undetected<br>it would not have been<br>likely to cause a<br>safety concern. |

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| ISSUE & TITLE   | DESCRIPTION OF ISSUE  | LP&L APPROACH TO RESOLUTION   | DATE | NONE | FL TO 5% | >5% | JUSTIFICATION   |
|---|---|---|------|------|----------|-----|---|
| 4. Lower Tier Corrective Actions Are Not Being Upgraded to NCRs | <p>LP&amp;L shall review all FCRs, DCNs, EDNs, and T-B DNs to assure that proper corrective action was taken, including an adequate review by QA. This corrective action shall include the steps required by 10CFR50, Appendix B, Criterion XVI Corrective Action and for Construction Deficiency Reporting, 50.55(e). Also, included in this review shall be the examination of improper voiding of all other design changes or discrepancy notices that affected safety-related systems or that were misclassified as safety.</p> | <p>LP&amp;L will review the lower tier document reporting system to ensure it was structured in such a manner that procedures, integral to the Quality Program, provided a sound basis for decisions regarding the severity level of documents used to report deficiencies. The review will specifically consider QA and QC reviews of engineering/construction judgements on deficiencies as it relates to the corrective action and nonconformance requirements of 10 CFR 50 Appendix B and the reporting requirements of 10 CFR 50.55(e).</p> <p>The response will include an assessment of all the lower tier documents specifically cited by the NRC to verify the adequacy of the proceduralized safeguards in assuring that deficiencies with safety significance are being properly dispositioned and reported. There will also be an assessment of improper voiding.</p> | 7/9  |      |          |     | <p>Based on the current review, LP&amp;L expects to demonstrate that there has been adequate QA/QC involvement in all lower tier documents with regard to 10CFR50, Appendix B corrective action and non-conformance requirements. This involvement is expected to show that appropriate corrective actions, specific and generic, are identified</p> <p>Our current evaluation of the examples of lower tier documents cited by the NRC demonstrates that although a small percentage should have been upgraded to NCR's under the quality program in effect, none had adverse safety significance.</p> |

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| ISSUE & TITLE                                | DESCRIPTION OF ISSUE   | LP&L APPROACH TO RESOLUTION   | DATE | NONE FL TO 5% >5% | JUSTIFICATION  |
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| 5. Vendor Documentation Conditional Releases | The concern relates to whether shortcomings in contractor's documentation which existed at the time the material was supplied have been corrected. | A problem did exist with formal tracking of Combustion Engineering Conditional Certifications of Equipment. Records associated with CE material and equipment will be re-reviewed and conditional certifications will be identified and promptly resolved. Control of CE material and equipment differs from that of other contractors. In order to verify that a similar problem does not exist in the case of other contractors, a sample audit of other critical purchase orders will be performed. If the sample audit identifies any other problems with the handling of contractor material releases, additional reviews will be initiated. | 7/13 |                   | The CE records and other records with the exception of JA Jones and Waldinger have been reviewed. To date 8 of 14 CE conditional certifications have been changed to unconditional. No items affecting plant safety have been identified in any of the completed reviews and dispositions. |

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| ISSUE & TITLE  | DESCRIPTION OF ISSUE   | LP&L APPROACH TO RESOLUTION  | DATE | NONE | FL TO 52 | >52 | JUSTIFICATION   |
|--|--|--|------|------|----------|-----|---|
| 6. Dispositioning of Non-conformance and Discrepancy Reports | Some Ebasco and Mercury NCRs and Ebasco DRs were questionably dispositioned and LP&L shall propose a program to assure all NCRs and DRs are appropriately upgraded, adequately dispositioned and corrective action completed and that any problems detected are corrected. | <p>First, the inplace program for handling of lower tier documents such as DRs will be discussed.</p> <p>Second, the specific NCRs and DRs cited by the NRC will be evaluated for proper designation, disposition, and implementation of corrective action under the existing Quality program.</p> <p>Third, a review of all NCRs was started by LP&amp;L in January to assess the validity of the disposition, the corrective action taken, the completeness of the documentation and proper closure.</p> <p>Fourth, a field verification will be conducted on one hundred randomly selected NCRs to ensure the corrective action resolved the nonconformance.</p> <p>If any problems are detected from these steps, a plan of further corrective action will be established.</p> | 7/13 |      |          |     | <p>To date, the NCRs cited by the NRC have been evaluated. Five of the 49 are being further evaluated. Three impact hardware and two software. The balance have been shown to be adequately dispositioned. The overall review of NCRs has been completed with the exception of approximately 300. This review showed 416 of the total 7750 NCRs were questioned. 85% of these deficiencies were documentation related and were not significant. The balance will be closed.</p> <p>To date 12 of 100 NCRs have been field verified. No conclusions have been drawn as of yet.</p> |

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| ISSUE & TITLE              | DESCRIPTION OF ISSUE  | LP&L APPROACH TO RESOLUTION  | DATE | NONE FL TO 5Z >5Z | JUSTIFICATION  |
|----------------------------|---|--|------|-------------------|--|
| 7. Backfill Soil Densities | Conduct a review of all soil packages for completeness and technical adequacy. Where records are missing or technical problems are defined, take corrective action. | The backfill records are being reviewed for completion and technical adequacy, record packages are being located and any technical issues will be evaluated. | 7/13 |                   | The effect of any postulated variations in density in the fill is not of significance relative to the seismic response of the plant as designed. In addition, should there be a few missing records, a satisfactory demonstration of the quality of the backfill will be provided. |

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|--|--|---|------|-------------------|---|
| 8. Visual Examination of Shop Welds during Hydrostatic Testing | Document inspections of shop welds during hydro tests or otherwise verify such inspection. | LP&L will provide documentation verifying that shop welds were inspected by qualified inspectors. | 7/6  |                   | Investigations to date show that shop welds were inspected and accepted during hydrostatic tests by an Authorized Nuclear Inspector as demonstrated by reports. The ASME N-5 code data reports also confirm that there was inspection of shop welds. The methodology of the field hydrostatic tests provide additional qualification of testing. Documentation on the above will be provided. |

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|-------------------------|--|--|------|-------------------|--|
| 9. Welder Certification | Locate missing documents for instrument cabinet welds and determine if welders were appropriately certified. Take appropriate action to assure the quality of the supports if documentation cannot be located. | <p>NCR W3-7549 was generated on 2/1/84 to track this problem. No documentation was found on three of the eighteen cabinets and partial documentation found on four. All seven were reinspected and found acceptable.</p> <p>As a result of the missing documentation, a review is being performed to determine other miscellaneous cases where Jones performed welding. Documentation for the welding identified will be reviewed.</p> | 7/20 |                   | All welding evaluated to date has been found acceptable. |

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|--|---|--|------|------|----------|-----|---|
| 10. Inspector Qualification (J. A. Jones and Fegles) | Verify the proper certification of QA/QC personnel and evaluate the impact of any deficiencies found. | <p>A reassessment of the adequacy of the program to certify inspectors will be performed for approximately 20% of all QC inspectors to assess the safety significance of the concern.</p> <p>Where deficiencies are identified, the inspections made by the subject QC personnel will be reviewed and an evaluation made of the safety significance with regard to design construction and operation. The need for additional corrective action will be assessed as part of the safety evaluation.</p> | 7/13 |      |          |     | <p>Preliminary evaluations of J. A. Jones QC personnel qualifications questioned by the NRC indicate they were qualified and certified to perform their assigned work function. The sample size was twenty percent (20%). Nineteen of the 20 were qualified and one was qualified pending clarification. Additional backup information was requested from Fegles to complete our evaluation. It is important to note that the inspectors performed no non-destructive testing (NDT). NDT was provided by GEO.</p> |

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|----------------|---|---|------|-------------------|--|
| 11. Cadwelding | Provide the cadweld data for the project in such a form that it can be readily compared to the testing criteria used for the Waterford 3 project with data broken down by various categories. Provide data on welder qualification and requalification including dates. | <p>The cadweld records will be transcribed onto computer data storage including the placement number, cadweld number, bar size, bar position, visual inspection acceptance or rejection, production splice tensile test acceptance or rejection, and sister splice tensile test acceptance or rejection.</p> <p>In this form the cadweld data can be called up by any of these attributes to expedite review for specification compliance or other reason. Also, physical location of cadwelds may then be readily obtained by reference to the concrete placement lift diagrams which locate the placements.</p> <p>Data on welder qualification and requalification will be gathered and provided as part of this effort.</p> | 7/20 |                   | Prior reviews have already been accomplished under NCR W3-6234 and non-conforming conditions resolved. |

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|---------------------------------------|--|--|------|------|----------|-----|--|
| 12. Main Steamline Framing Restraints | Complete the documentation for all connections in the steam generator framing. | SCD 78 was resolved and subsequently reopened upon discovery that inspections in one area were not complete. NCR-W3-7736 issued to track resolution of the deficiency. In order to assure complete resolution of this concern, LP&L initiated both a 100% QC reinspection of steam generator framing connections as well as a review of the American Bridge work scope against the scope of SCD 78 reinspections to assure that reinspections were complete.<br><br>All connections were reinspected. Requisite bolt replacement and NCR closure is scheduled to be completed by July 6, 1984. | 7/13 |      |          |     | The safety significance of not replacing the bolts which were replaced is still under evaluation. However, the actual restraint structure is not needed until the reactor generates power and therefore the bolting is not a constraint to fuel load or operations up to 5Z power. |

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|------------------|--|--|------|------|----------|-----|---|
| 11. Missing NCRs | LP&L shall obtain the missing NCRs, explain why these NCRs were not maintained in the filing system, review them for proper voiding, and assure that when an issue is raised to an NCR, it is properly filed for tracking and closure. | <p>LP&amp;L is conducting a review of closed and voided Ebasco NCRs to determine if they are not properly indexed and filed in the QA records vault.</p> <p>The evaluation will identify all NCRs, which are indicated as closed or voided by site QA tracking mechanisms but not vaulted, and provide an explanation as to why they are missing, assure proper voiding, and assure proper filing and tracking.</p> <p>A similar evaluation is being conducted on NCRs which were issued by Ebasco QA in New York.</p> | 7/6  |      |          |     | <p>A review to date indicates that only five out of more than 7500 site-issued NCRs, which have been closed or voided, are not indexed and filed. Of the five NCRs which have not been indexed and filed, it can be demonstrated that they apparently were never issued. Sufficient documentation is on file to demonstrate the acceptability of the safety-related items described in the log entries corresponding to these five NCR numbers. The review indicates the problem stems from NCR tracking system utilized prior to mid-1979, and that since then the improved NCR tracking system has been adequate. In addition the review indicated that there were thirteen numbers that were apparently never assigned to an NCR. LP&amp;L is in process of confirming that NCRs with these numbers were never issued.</p> |

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|--|--|--|------|--------------------|--|
| 14. J. A. Jones Speed letters and EIRs | <p>During the Ebasco QA review of J. A. Jones speed letters and engineering information requests, several items that could affect plant safety were noted. Based on its sample of these actions, the staff does not expect that any of these items will significantly affect plant safety. Nevertheless, the applicant should complete the actions identified in these reviews and issues raised shall be resolved promptly.</p> | <p>First, a review has been conducted of correspondence between J. A. Jones and Ebasco via Speed letters and EIRs.</p> <p>Second, a review of such correspondence in which design changes were conveyed to J. A. Jones without reference to follow-up action to formalize the changes is being conducted to determine safety significance.</p> <p>Third, a minimum sample of ten percent of informal documents such as speed letters and EIRs by other contractors performing safety-related work who utilized these type of documents is being conducted. The need to review additional documentation will be determined based on the results of this review.</p> | 7/20 |                    | <p>To date about 1100 pieces of JA Jones correspondence have been reviewed and 271 design changes identified. Of these, 190 have been approved as acceptable, 27 are the subject of field investigations to develop information for evaluation, and the balance are under review. To date no safety problems have been defined that would require rework.</p> <p>For other contractors, the review has shown that 8 of 42 Fegles, 3 of 119 Waldinger, and 2 of 660 T-B informal documents could involve design changes. These reviews are substantially complete and evaluations are in process.</p> |

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## CURRENT ASSESSMENT OF SAFETY SIGNIFICANCE

| ISSUE & TITLE  | DESCRIPTION OF ISSUE   | LP&L APPROACH TO RESOLUTION  | DATE | NONE | FL TO 5% | >5% | JUSTIFICATION  |
|--|--|--|------|------|----------|-----|--|
| 15. Welding of "D" level Material Inside Containment | Locate the documentation for "D" level material welding and verify the adequacy of the information or perform a material analysis and NDE work, or rework the welds. | <p>LP&amp;L will conduct a review to confirm that material and weld rod records exist to establish material control for all "D" material welds; identify and verify the certification of all welders, and; provide inspection, procedures and data as well as affidavits from inspectors. Documentation will be tied to specific welds as much as possible. This will include identification of "D" material welds and compilation of:</p> <ol style="list-style-type: none"> <li>1) applicable CB&amp;I "as built" drawing numbers;</li> <li>2) identification of welds by piece mark numbers and material type (i.e. D to D, D to B, etc.);</li> <li>3) quantities for repetitions weld I.D.'s;</li> <li>4) weld type and size, and; 5) indication as to shop or field welds. LP&amp;L will evaluate the results and determine whether reinspection are required and what the scope of such a reinspection will be.</li> </ol> | 7/13 |      |          |     | <p>The CB&amp;I QA manual requirements for documentation of fit-up and final weld inspections do not apply to "D" material welding although weld inspections were performed. The work was performed by the same welders and inspected by the same welding supervisors to the same standard as the rest of the CB&amp;I work for which documentation is provided. This provides a high degree of confidence in the quality of the finished work. Additionally very low rates of rejection in NDE tests and in independent surveillances and audits indicates high work quality.</p> |

PRELIMINARY

## PROGRAM PLAN

## CURRENT ASSESSMENT OF SAFETY SIGNIFICANCE

| ISSUE & TITLE                                   | DESCRIPTION OF ISSUE  | LP&L APPROACH TO RESOLUTION  | DATE | NONE | FL TO SL | SL TO HS | JUSTIFICATION   |
|---|---|--|------|------|----------|----------|---|
| 16. Surveys and Exit Interviews of QA Personnel | The NRC was critical of the manner in which a program of interviewing site QA/QC personnel in order to identify and take appropriate action regarding their concerns was conducted. | <p>The interview forms have been personally reviewed by the Senior V.P.- Nuclear to assess whether the program met his intent and the basis for the NRC comments. Two further LP&amp;L staff actions remain.</p> <p>1) A review by the Independent Safety Evaluation Group (ISEG) primarily to assure that the concerns received during the interviews were or will be appropriately addressed and necessary corrective actions taken</p> <p>2) A determination as to the Scope and manner in which future methods of addressing issues raised by individuals are addressed.</p> | 7/9  |      |          |          | Reviews to date have not identified significant safety concerns not already identified. |

PRELIMINARY

## PROGRAM PLAN

## CURRENT ASSESSMENT OF SAFETY SIGNIFICANCE

| ISSUE & TITLE   | DESCRIPTION OF ISSUE  | LP&L APPROACH TO RESOLUTION   | DATE | NONE FL TO 5% >5% | JUSTIFICATION   |
|---|---|---|------|-------------------|---|
| 17. QC Verification of Expansion Anchor Characteristics | The NRC is concerned on whether there was sufficient QC verification of the characteristics necessary to ensure proper installation of concrete expansion anchors installed by Mercury. | The concern stems over the fact that a 1982 revision of an inspection form does not list the requisite QC inspection attributes. The initial review of this matter indicates that the requisite QC reviews were made as required by the drawings which accompanied the inspection forms. This was substantiated by a thorough review of Mercury quality records. LP&L will prepare a response discussing the incorporation of drawings into the procedure, training of Mercury personnel, the QC review and substantiation of records and a root cause evaluation of the problem. | 7/6  |                   | Initial reviews show that the requisite characteristics were part of the procedure (incorporated by drawings). This provides reasonable assurance that QC verification was adequate. Previously there were 896 re-inspections made of installed expansion anchor characteristics to confirm records validity. |

PRELIMINARY

## PROGRAM PLAN

## CURRENT ASSESSMENT OF SAFETY SIGNIFICANCE

| ISSUE & TITLE  | DESCRIPTION OF ISSUE  | LP&L APPROACH TO RESOLUTION   | DATE | NONE FL TO 5% >5% | JUSTIFICATION   |
|--|---|---|------|-------------------|---|
| 18. Documentation of Walkdowns of Non-Safety Related Equipment | Documentation should be provided that clearly shows what equipment was reviewed during the walkdowns and on what bases it was concluded that the installation was acceptable. | The response to this issue discusses the manner in which design and installation considered the effects of interactions of non-seismic with safety-related systems during an SSE. Documentation attesting to the scope, conduct and results of the review will be provided. | 7/5  |                   | <p>The design and construction of Waterford-3 considered interactions of non-seismic Mechanical, Electrical, HVAC, Civil and Instrumentation equipment with safety-related equipment.</p> <p>The walkdown verified that such interactions do not constitute a safety concern.</p> |

PRELIMINARY



## PROGRAM PLAN

## CURRENT ASSESSMENT OF SAFETY SIGNIFICANCE

| ISSUE & TITLE                                | DESCRIPTION OF ISSUE  | LP&L APPROACH TO RESOLUTION  | DATE | NONE | FL TO SZ | >SZ | JUSTIFICATION   |
|--|---|--|------|------|----------|-----|---|
| 19. Water in Basemat Instrumentation Conduit | Review all conduit that penetrates the basemat and terminates above the top of the basemat to assure that these potential direct access paths of water are properly sealed. | <p>A walkdown was performed which identified 19 places where wetness due to seepage from conduits was found. These cases will be addressed by removing the existing seals and replacing them with a light density silicone elastomer which has the capability to stop the seepage. This work will be performed at the convenience of LP&amp;L since the slow seepage through the seals is not a flooding hazard but rather a nuisance to maintenance.</p> <p>Temporary conduits which enter the basemat from outside, and which once allowed passage of ground water in quantities that required periodic pumping, have now all been pressure grouted and their temporary blackout pits filled with concrete and no longer serve as a leak path for ground water.</p> <p>The one piezometer standpipe which remains in service will also be grouted since it monitors a deep aquifer of no present interest.</p> | 7/6  |      |          |     | There was never a path for ground water to flow in sufficient quantity to flood the auxiliary building basement, even before the seals were installed and before the temporary conduits were grouted. The floor drain and sump pump system was more than adequate to handle the quantity of water which entered the building during construction, and is adequate to handle the much reduced quantity presently observed. |

PRELIMINARY

## PROGRAM PLAN

## CURRENT ASSESSMENT OF SAFETY SIGNIFICANCE

| ISSUE & TITLE   | DESCRIPTION OF ISSUE   | LP&L APPROACH TO RESOLUTION  | DATE | NONE FL TO SL >SL | JUSTIFICATION  |
|---|--|--|------|-------------------|--|
| 20. Construction Materials Testing (CMT) Personnel Qualification Records. | Verify the proper certification of construction materials testing personnel. | LP&L is reviewing the supporting documentation for the corrective action of NCR-W3-F7-116 to ensure the adequacy of the corrective action. Additional supporting information will be sought as necessary in order to confirm adequate qualifications. Evaluation will be made of the adequacy of certifications for individual personnel and if certifications are judged inadequate, the implied safety concerns that are raised will be addressed. | 7/13 |                   | Corrective action taken as a result of an LP&L Task Force verification effort on GEO documentation for CMT personnel qualifications (See NCR W3-F7-116). |

PRELIMINARY

## PROGRAM PLAN

## CURRENT ASSESSMENT OF SAFETY SIGNIFICANCE

| ISSUE & TITLE   | DESCRIPTION OF ISSUE  | LP&L APPROACH TO RESOLUTION  | DATE | NONE FL TO 5% >5% | JUSTIFICATION  |
|---|---|--|------|-------------------|--|
| 21. LP&L Construction System Status and Transfer Reviews. | A concern exists over whether construction deficiencies were properly dispositioned or identified during the process of transferring systems from construction to plant operations. | A review of transfer correspondence on the systems which were the cause of this concern will be performed. A review will be conducted to verify that deficiencies in transferred systems had no impact on testing. | 7/6  |                   | A review of 100% of turnover/transfer correspondence showed no additional correspondence was outstanding beyond that previously identified. Deficiencies identified on the outstanding correspondence (13 SUS) have been reviewed by LP&L start-up/operations and it was determined that there was no impact on testing. |

PRELIMINARY

## PROGRAM PLAN

## CURRENT ASSESSMENT OF SAFETY SIGNIFICANCE

| ISSUE & TITLE  | DESCRIPTION OF ISSUE   | LP&L APPROACH TO RESOLUTION  | DATE | NONE | FL TO 52 | >52 | JUSTIFICATION  |
|--|--|--|------|------|----------|-----|--|
| 22. Welder Qualification (Mercury) and Fillet Material Control (Site Wide) | <p>Verify welder qualifications or assure the quality of all welds.</p> <p>Provide engineering justification for the allowance of "rebake" temperatures and holding times that differ from the requirements of the ASME and AWS Codes.</p> | <p>LP&amp;L has conducted a review of all Mercury welders. The review confirmed that the documentation to support their proper qualification is available. Baking/rebaking is not allowed on the site and the complete answer will describe the site procedures and applicable code requirements and show that handling of filler material meets the required codes.</p> | 7/6  |      |          |     | <p>Documentation to support the proper qualification of all Mercury welders is available. NCR-W3-7724 was opened to document qualifications sheet errors for 3 welders.</p> <p>No code deviations exist.</p> |

PRELIMINARY

## PROGRAM PLAN

## CURRENT ASSESSMENT OF SAFETY SIGNIFICANCE

| ISSUE & TITLE  | DESCRIPTION OF ISSUE  | LP&L APPROACH TO RESOLUTION  | DATE | NONE | FL TO 52 | >52 | JUSTIFICATION  |
|--|---|--|------|------|----------|-----|--|
| 23. QA Program Breakdown between Ebasco and Mercury. | Determine the cause of the breakdown, the adequacy of the corrective action, and provide assurance on the adequacy of the operational QA Program. | <p>LP&amp;L will review corrective action commitments made on the NRC enforcement action and provide a detailed evaluation of the actions taken. A review of the audit programs will be performed to evaluate frequency and followup of required corrective actions of the program. The independent management assessments will be reviewed with actions taken.</p> <p>LP&amp;L will provide an assessment of the overall QA program to provide assurance that the QA program can function adequately during operations.</p> | 7/13 |      |          |     | The Mercury reviews have been completed with the exception of SCD-61 "Linear Crack in Stainless Steel Tubing"(currently under reevaluation). The review indicates that there are no open items affecting plant safety. |

PRELIMINARY



**LOUISIANA**  
**POWER & LIGHT**

317 BARONNE STREET • P.O. BOX 60340  
NEW ORLEANS, LOUISIANA 70160

• (504) 585-2204

June 20, 1984

J.M. CAIN  
President and  
Chief Executive Officer

W3B84-0445

Mr. Saul Levine  
NUS Corporation  
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Gaithersburg, Maryland 20878

Mr. Robert L. Ferguson  
UNC Nuclear Industries, Inc.  
1200 Jadwin, Suite 425  
Richland, Washington 99352

Mr. Larry L. Humphries  
UNC Nuclear Industries, Inc.  
P.O. Box 490  
Richland, Washington 99352

SUBJECT: Pre-Licensing Issue Assessment  
Task Force Charter

REFERENCE: Discussions in the Offices of Shaw, Pittman,  
Potts & Trowbridge, Washington, D.C., June 13, 1984

Dear Messrs: Levine, Ferguson and Humphries:

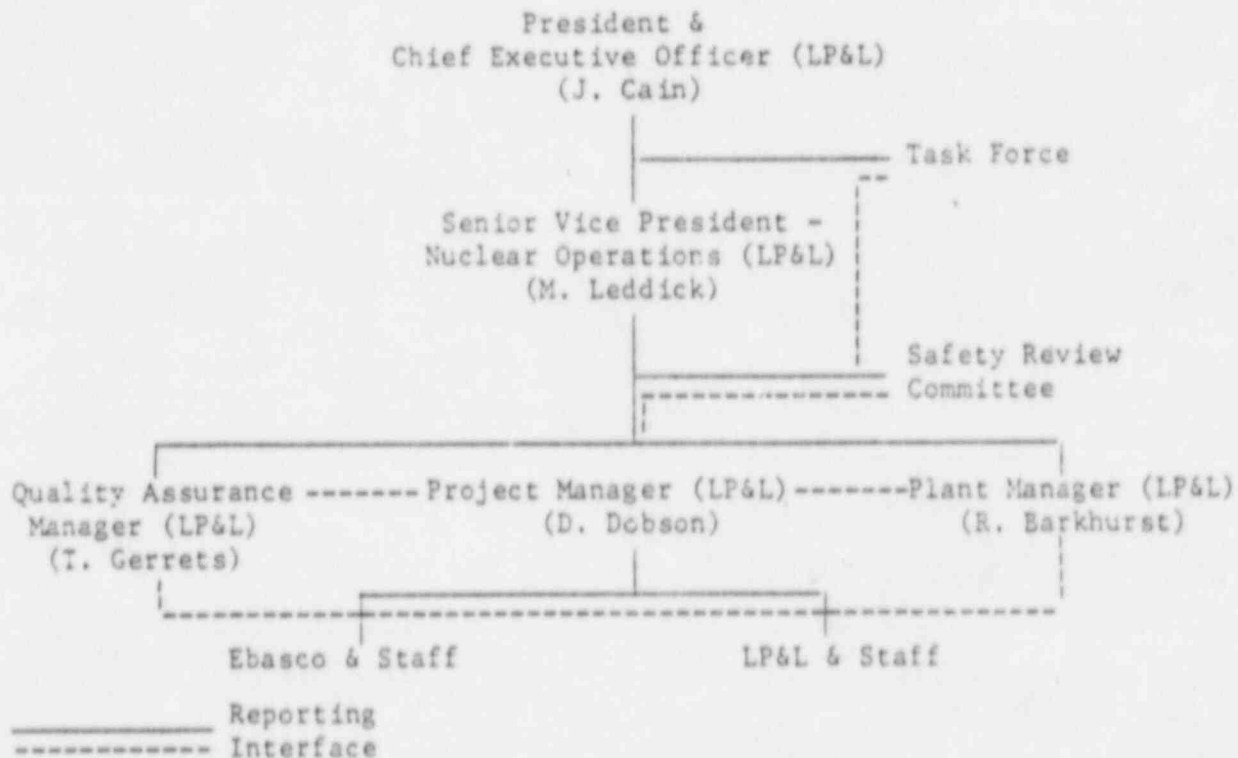
Pursuant to discussions in the referenced meeting, this formalizes agreements reached between us as to the charter of the subject Task Force.

The roles of UNC and NUS will be to act as a task force in providing assessment and advice in responding to the NRC letter of June 13, 1984. It is important to emphasize that both UNC and NUS will maintain sufficient independence in order to provide to me as Chief Executive Officer of LP&L an independent professional assessment regarding the functions listed below. Your assessments will be formalized and sent to the Director of the Office of Nuclear Reactor Operations at the same time they are provided to me.

- The Program Plan and implementation schedule requested in the NRC letter.
- The adequacy of responses and resolutions (including validation of data and sources, as appropriate) of the matters set out in the NRC letter.

- The safety significance of the matters listed in the NRC letter with respect to:
  - Fuel load and testing up to 5% power
  - Operation above 5% power
- The adequacy of the past QA/QC program in light of the matters listed in the NRC letter, and the resolution of such matters.
- Recommend institutional or programmatic changes that are deemed appropriate during plant operation in light of the lessons learned as a result of the matters set forth in the NRC letter, and the LP&L responses hereto.

The following abbreviated organization chart is provided to clearly depict that the Task Force is to have access to and interface with all necessary elements of the Waterford staff but is to report directly to me.



Very truly yours,

*J.M. Cain*  
J.M. Cain

JMC:DED:pb

cc: G. Charnoff, R.S. Leddick, D.E. Dobson





**LOUISIANA**  
POWER & LIGHT

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*Eisenhut*  
*D. Crutchfield*  
*How is it going?*  
*De*  
*72*  
J.M. CAIN  
President and  
Chief Executive Officer

June 28, 1984

W3B84-0449

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

SUBJECT: Program Plan for Resolution of Pre-Licensing Issues

REFERENCE: NRC Letter Dated June 13, 1984, Docket No. 50-382.

Dear Mr. Eisenhut:

Louisiana Power & Light has established a major program, with significant commitment of management resources, to address the issues raised in your letter to me of June 13, 1984.

I am enclosing for your information a program plan which describes the organization of our new program and the methods of approaching resolution of the issues you have raised. Key to our program is the designation of an outside, highly qualified Task Force to assist in the development of our plans for resolution and to independently assess the adequacy of the resolutions and their safety significance. The Task Force will consist of Larry L. Humphreys, President, UNC Nuclear Industries, Inc., Saul Levine, Vice President, NUS Corporation, and Robert L. Ferguson, Chairman, UNC, assisted by suitable UNC and NUS personnel.

The Task Force will independently review LP&L's proposed resolution of the matters, and will report directly to me. Formal reports to me will be simultaneously provided to you. The Task Force's charter is set out in my June 20, 1984 letter to the Task Force, enclosed.

We have also designated a top management team dedicated to resolution of the issues and administration of our program. The team is headed by Dale E. Dobson, Waterford 3 Project Manager, reporting directly to R.S. Leddick, Senior Vice President - Nuclear, and includes management involvement of the plant operational staff. I will be personally and directly overseeing the program efforts.

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Mr. Darrell G. Eisenhut  
June 28, 1984  
W3B84-0449  
Page 2

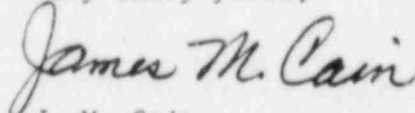
In addition, the resolution of the issues raised by your staff will be reviewed by the Waterford 3 Safety Review Committee (SRC) through a special subcommittee consisting of Kenneth W. Cook, LP&L Nuclear Support and Licensing Manager, Chairman; Joseph M. Hendrie, Consulting Engineer; Robert M. Douglass, Manager of Quality Assurance, Baltimore Gas & Electric Company; Raymond F. Burski, LP&L Engineering and Nuclear Safety Manager; and Thomas F. Gerrets, LP&L Corporate Quality Assurance Manager.

You can be assured that LP&L is totally dedicated to achieving the highest level of safety achievable in the plant, and we take very seriously the matters you have set out in your letter. I do not intend to request a fuel loading/low power license, or a full power license, until I am personally satisfied that all issues necessary for those phases of plant operation have been satisfactorily addressed to assure the public health and safety. You have my personal assurance that necessary programmatic and management changes arising from our program to resolve these issues will be immediately and effectively implemented.

The attachment to the program plan listing the LP&L approach to resolution of the individual issues has not yet been reviewed by the Task Force or the SRC, and is subject to modification as a result of reviews by those groups and your staff. The plan is intended to provide an early and high level of confidence in the successful resolution of the issues and concerns you have raised.

I welcome your comments and suggestions.

Very truly yours,

  
J. M. Cain

Enclosures:  
As Stated

cc: With Enclosure:  
See next page

Mr. Darrell G. Eisenhut, Director  
W3B84-0449  
June 28, 1984

Page 3

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June 28, 1984

WATERFORD 3  
PROGRAM PLAN AND SCHEDULE

I. INTRODUCTION AND PURPOSE

This Program Plan outlines the methods by which the 23 individual issues described in the NRC letter, Docket No. 50-382, dated June 13, 1984, are to be resolved by LP&L. Further, the Plan provides a mechanism to address the cause of the issues, the generic implications and collective significance of the issues, and the programmatic and management changes designed to preclude recurrence of such issues. The Program includes the establishment of an independent Task Force to advise LP&L and evaluate LP&L's resolution of the issues, and separate review of the resolution by the Waterford 3 Safety Review Committee (SRC).

II. PROGRAM PLAN MANAGEMENT

1. The LP&L Project Manager - Nuclear is assigned responsibility for management of the overall Plan and actions outlined in paragraphs III and IV below. He will perform these tasks in a normal line management role and have access to and the support of any requisite LP&L and contractor managers and staffs on a top priority basis. He will assure effective interfaces with external groups including the SRC and the UNC/NUS Task Force described in paragraph VI below.
2. The Project Manager-Nuclear reports directly to the Senior Vice President-Nuclear, who in turn reports directly to the President and Chief Executive Officer of LP&L. Both the Senior Vice President-Nuclear and the CEO are directly and actively involved in the management of the Program.

III. RESOLUTION OF ISSUES

1. Each issue will be analyzed to determine:
  - The cause
  - The generic implication

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- The actions and schedules to correct both the specific problem and related generic concerns
  - The safety significance with respect to fuel load and low power operation, and to operation above 5% power
2. The intended manner in which each of the 23 issues are to be addressed is described in Attachment 1. It should be noted that the manner of resolution may need modification as actions necessary to resolve any related safety concerns are undertaken.

#### IV. COLLECTIVE SIGNIFICANCE AND PROGRAMMATIC CHANGES

As early as feasible in the process of formulating the information contained in paragraph III above, the LP&L Project Manager-Nuclear will:

1. assess the collective significance of the individual issues, and
2. recommend institutional or programmatic changes deemed appropriate to avoid recurrence of the types of problems underlying the issues being addressed

#### V. SAFETY REVIEW COMMITTEE

1. The Waterford 3 Safety Review Committee (SRC) has designated an SRC subcommittee to review the items outlined in paragraph III and IV above.
2. The SRC subcommittee consists of Kenneth W. Cook, LP&L Nuclear Support and Licensing Manager, Chairman; Joseph M. Hendrie, Consulting Engineer; Robert M. Douglass, Manager of Quality Assurance, Baltimore Gas and Electric Company; Raymond F. Burski, LP&L Engineering and Nuclear Safety Manager; and Thomas F. Gerrets, LP&L Corporate Quality Assurance Manager.

#### VI. INDEPENDENT ASSESSMENT

1. An independent assessment of the resolutions and determination of safety significance will be provided by a Task Force reporting directly to the CEO of LP&L. The Task Force consists of officials of UNC Nuclear Industries, Inc., Richland, Washington, and

NUS Corporation, Gaithersburg, Maryland, who will be assisted by UNC and NUS staff members, as required. The Task Force will independently assess LP&L's resolution of the issues, including the cause, generic implications and collective significance of the issues. The Task Force will also provide advice and assistance in the resolution of the issues, and will provide an independent assessment of the safety significance of the issues with respect to fuel loading and low power testing, and operation above 5% power. It will assess the adequacy of LP&L QA/QC program in light of the NRC's issues, and will recommend any institutional or programmatic changes which may be necessary to prevent recurrence of the issues.

2. The charter, identification of principals, initial functions have been formalized, as specified in Attachment 2 hereto.

#### VII. RESPONSE TO NRC

The individual issues vary considerably in both the degree of concern and complexity of resolution. Therefore, LP&L intends to forward to the NRC the proposed resolution data individually or in packages as they are completed and have undergone the degree of review specified herein. Some of the resolutions may be submitted before completion of all requisite corrective actions, which are underway or defined and scheduled for accomplishment, have been accomplished. Upon submittal, each resolution will be added as Appendix A of the Program Plan to constitute a major part of the final report.

#### VIII. SCHEDULE

Attachment 1 lists the target dates for Project Management completion of resolution data on each issue. These dates include a period of time Project Management has scheduled for completion of its review and that of by the SRC and Task Force, although these dates are difficult to predict. Target dates for development of the collective significance of the issues and recommended programmatic changes outlines in paragraph IV above are to be established by July 6, 1984.



## PROGRAM PLAN

## CURRENT ASSESSMENT OF SAFETY SIGNIFICANCE

| ISSUE & TITLE                  | DESCRIPTION OF ISSUE  | LP&L APPROACH TO RESOLUTION  | DATE | NONE FL TO 5% >5% JUSTIFICATION   |
|--------------------------------|---|--|------|---|
| 1. Inspection Personnel Issues | Verify the proper certification of site QA/QC personnel or requalify the work performed by these personnel. | <p>LP&amp;L will verify the credentials of QA managers, supervisors and personnel certifying inspectors, and auditors.</p> <p>A verification of the certification of approximately 20% of all QC inspectors is being done to assess the safety significance of the concern. A description of the certification criteria (ANSI N45.2.6-1973), as required by the Quality program, and a matrix showing certification and supporting documentation will be prepared. Further efforts, including any necessary reinspections, will be based on specific problems and root cause analyses and will be as necessary to verify the adequacy of the program and compliance with the program.</p> <p>For the QC inspectors remaining onsite, a reverification of proper certification in accordance with ANSI N45.2.6-1973 is being accomplished.</p> <p>Quality Control inspections currently being undertaken as part of other programs will be performed by QC personnel reverified as qualified under ANSI N45.2.6-1973.</p> | 7/20 | <p>A preliminary evaluation of the T-B and Mercury QC inspectors questioned by the NRC indicated they were qualified and <u>certified to perform their assigned work function.</u></p> <p>It is important to note that the inspectors for the major installers of safety related equipment and systems (e.g., Tompkins-Beckwith, Fischback &amp; Moore, Mercury, NISCO, American Bridge, J. A. Jones, and Gulf) performed no non-destructive testing (NDT). NDT was provided by GEO.</p> <p>An audit was performed on all contractors performing safety related work. An assessment of the current audit results, which do not include American Bridge and CE, indicate QC personnel were qualified and certified. Additional backup information has been requested from CE and American Bridge to complete the evaluation. The preliminary results of the audit are listed below.</p> <ol style="list-style-type: none"> <li>1. GEO (NDE) - 23 sampled/23 qualified</li> <li>2. Waldinger - 5 sampled/5 qualified</li> <li>3. B&amp;B - 8 sampled/8 qualified</li> <li>4. Sline - 15 sampled/15 qualified</li> </ol> |

PRELIMINARY

## PROGRAM PLAN

## CURRENT ASSESSMENT OF SAFETY SIGNIFICANCE

| ISSUE & TITLE                               | DESCRIPTION OF ISSUE  | LP&L APPROACH TO RESOLUTION  | DATE | NONE | FL TO 5% | >5% | JUSTIFICATION   |
|---|---|--|------|------|----------|-----|---|
| 2. Missing NI Instrument Line Documentation | Verify compliance with NRC requirements for NI instrumentation installations. | LP&L will review all NI instrumentation installed during the period when class breaks were allowed (prior to April 7, 1982), identify required documentation to demonstrate correct installation and inspection, and identify the documentation available. A QA review of all safety-related NI instrumentation systems has been performed which verified that all installations were properly documented and inspected. | 7/6  |      |          |     | To date, 90 locally mounted NI instruments have been identified as being installed prior to April 7, 1982. To date, using ASME III documentation criteria as a basis for comparison, full or partial compliance can be shown for the 12 installation at issue. Of the remaining installations 35 had no class breaks, 19 were thermocouples with no tubing, and 24 had been reclassified to N2 (i.e. not required for safe shutdown). |

PRELIMINARY



## PROGRAM PLAN

## CURRENT ASSESSMENT OF SAFETY SIGNIFICANCE

| ISSUE & TITLE                                      | DESCRIPTION OF ISSUE  | LP&L APPROACH TO RESOLUTION   | DATE | NONE FL TO 5Z 75Z | JUSTIFICATION  |
|--|---|---|------|-------------------|--|
| 3. Instrumentation<br>Expansion Loop<br>Separation | Correct separation<br>criteria violations<br>found in system 52A and<br>provide a program for<br>review of other safety-<br>related violations and<br>take the necessary<br>corrective actions. | <p>NCR-W3-7702 covers the system 52A problems<br/>and has been dispositioned to remove the<br/>expansion loops in question thus solving<br/>the problem.</p> <p>NCR-W3-7730 was generated to track the generic<br/>concern. In order to provide some basis for<br/>determining the scope of our program, a sample<br/>of 51 instrument installations were chosen for<br/>review in area of congestion, and walkdowns of<br/>these lines were done. Thirteen violations were<br/>found out of 276 locations, although only one<br/>required rework. It was decided to perform a QC<br/>verification of all lines where the redundant<br/>tubing was run together and take the appropriate<br/>action. An interim response discussing the<br/>resolution of NCR-W3-7702 items and the status<br/>of NCR-W3-7330 reinspections will be provided<br/>as well as a schedule for completion of the<br/>reinspections.</p> | 7/13 |                   | The walkdown to date<br>represents approximate-<br>ly 20% of the installa-<br>tions to be walked down<br>and the amount of<br>rework being identified<br>has been found to be<br>very minor (i.e. three<br>feet of tube track<br>cover). If the issue<br>had gone undetected<br>it would not have been<br>likely to cause a<br>safety concern. |

PRELIMINARY

## PROGRAM PLAN

## CURRENT ASSESSMENT OF SAFETY SIGNIFICANCE

| ISSUE & TITLE   | DESCRIPTION OF ISSUE  | LP&L APPROACH TO RESOLUTION   | DATE | NONE | FL | TO 5% | >5% | JUSTIFICATION   |
|---|---|---|------|------|----|-------|-----|---|
| 4. Lower Tier Corrective Actions Are Not Being Upgraded to NCRs | <p>LP&amp;L shall review all FCRs, DCNs, EDNs, and T-B DNs to assure that proper corrective action was taken, including an adequate review by QA. This corrective action shall include the steps required by 10CFR50, Appendix B, Criterion XVI Corrective Action and for Construction Deficiency Reporting, 50.55(e). Also, included in this review shall be the examination of improper voiding of all other design changes or discrepancy notices that affected safety-related systems or that were misclassified as safety.</p> | <p>LP&amp;L will review the lower tier document reporting system to ensure it was structured in such a manner that procedures, integral to the Quality Program, provided a sound basis for decisions regarding the severity level of documents used to report deficiencies. The review will specifically consider QA and QC reviews of engineering/construction judgements on deficiencies as it relates to the corrective action and nonconformance requirements of 10 CFR 50 Appendix B and the reporting requirements of 10 CFR 50.55(e).</p> <p>The response will include an assessment of all the lower tier documents specifically cited by the NRC to verify the adequacy of the proceduralized safeguards in assuring that deficiencies with safety significance are being properly dispositioned and reported. There will also be an assessment of improper voiding.</p> | 7/9  |      |    |       |     | <p>Based on the current review, LP&amp;L expects to demonstrate that there has been adequate QA/QC involvement in all lower tier documents with regard to 10CFR50, Appendix B corrective action and non-conformance requirements. This involvement is expected to show that appropriate corrective actions, specific and generic, are identified</p> <p>Our current evaluation of the examples of lower tier documents cited by the NRC demonstrates that although a small percentage should have been upgraded to NCR's under the quality program in effect, none had adverse safety significance.</p> |

PRELIMINARY

## PROGRAM PLAN

## CURRENT ASSESSMENT OF SAFETY SIGNIFICANCE

| ISSUE & TITLE                                | DESCRIPTION OF ISSUE   | LP&L APPROACH TO RESOLUTION   | DATE | NONE FL TO 5% >5% | JUSTIFICATION  |
|--|--|---|------|-------------------|--|
| 5. Vendor Documentation Conditional Releases | The concern relates to whether shortcomings in contractor's documentation which existed at the time the material was supplied have been corrected. | A problem did exist with formal tracking of Combustion Engineering Conditional Certifications of Equipment. Records associated with CE material and equipment will be re-reviewed and conditional certifications will be identified and promptly resolved. Control of CE material and equipment differs from that of other contractors. In order to verify that a similar problem does not exist in the case of other contractors, a sample audit of other critical purchase orders will be performed. If the sample audit identifies any other problems with the handling of contractor material releases, additional reviews will be initiated. | 7/13 |                   | The CE records and other records with the exception of JA Jones and Waldinger have been reviewed. To date 8 of 14 CE conditional certifications have been changed to unconditional. No items affecting plant safety have been identified in any of the completed reviews and dispositions. |

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## PROGRAM PLAN

## CURRENT ASSESSMENT OF SAFETY SIGNIFICANCE

| ISSUE & TITLE  | DESCRIPTION OF ISSUE   | LP&L APPROACH TO RESOLUTION  | DATE | NONE FL TO SZ > SZ | JUSTIFICATION   |
|--|--|--|------|--------------------|---|
| 6. Dispositioning of Non-conformance and Discrepancy Reports | Some Ebasco and Mercury NCRs and Ebasco DRs were questionably dispositioned and LP&L shall propose a program to assure all NCRs and DRs are appropriately upgraded, adequately dispositioned and corrective action completed and that any problems detected are corrected. | <p>First, the Inplace program for handling of lower tier documents such as DRs will be discussed.</p> <p>Second, the specific NCRs and DRs cited by the NRC will be evaluated for proper designation, disposition, and implementation of corrective action under the existing Quality program.</p> <p>Third, a review of all NCRs was started by LP&amp;L in January to assess the validity of the disposition, the corrective action taken, the completeness of the documentation and proper closure.</p> <p>Fourth, a field verification will be conducted on one hundred randomly selected NCRs to ensure the corrective action resolved the nonconformance.</p> <p>If any problems are detected from these steps, a plan of further corrective action will be established.</p> | 7/13 |                    | <p>To date, the NCRs cited by the NRC have been evaluated. Five of the 49 are being further evaluated. Three impact hardware and two software. The balance have been shown to be adequately dispositioned. The overall review of NCRs has been completed with the exception of approximately 300. This review showed 416 of the total 7750 NCRs were questioned. 85% of these deficiencies were documentation related and were not significant. The balance will be closed.</p> <p>To date 12 of 100 NCRs have been field verified. No conclusions have been drawn as of yet.</p> |

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## CURRENT ASSESSMENT OF SAFETY SIGNIFICANCE

| ISSUE & TITLE              | DESCRIPTION OF ISSUE  | LP&L APPROACH TO RESOLUTION  | DATE | NONE | FL TO 5Z | >5Z | JUSTIFICATION  |
|----------------------------|---|--|------|------|----------|-----|--|
| 7. Backfill Soil Densities | Conduct a review of all soil packages for completeness and technical adequacy. Where records are missing or technical problems are defined, take corrective action. | The backfill records are being reviewed for completion and technical adequacy, record packages are being located and any technical issues will be evaluated. | 7/13 |      |          |     | The effect of any postulated variations in density in the fill is not of significance relative to the seismic response of the plant as designed. In addition, should there be a few missing records, a satisfactory demonstration of the quality of the backfill will be provided. |

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| ISSUE & TITLE  | DESCRIPTION OF ISSUE   | LP&L APPROACH TO RESOLUTION   | DATE | NONE FL TO 5% >5% | JUSTIFICATION   |
|--|--|---|------|-------------------|---|
| 8. Visual Examination of Shop Welds during Hydrostatic Testing | Document inspections of shop welds during hydro tests or otherwise verify such inspection. | LP&L will provide documentation verifying that shop welds were inspected by qualified inspectors. | 7/6  |                   | Investigations to date show that shop welds were inspected and accepted during hydrostatic tests by an Authorized Nuclear Inspector as demonstrated by reports. The ASME N-5 code data reports also confirm that there was inspection of shop welds. The methodology of the field hydrostatic tests provide additional qualification of testing. Documentation on the above will be provided. |

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| ISSUE & TITLE           | DESCRIPTION OF ISSUE   | LP&L APPROACH TO RESOLUTION   | DATE | NONE | FL TO 5Z | >5Z | JUSTIFICATION  |
|-------------------------|--|---|------|------|----------|-----|--|
| 9. Welder Certification | Locate missing documents for instrument cabinet welds and determine if welders were appropriately certified. Take appropriate action to assure the quality of the supports if documentation cannot be located. | NCR W3-7549 was generated on 2/1/84 to track this problem. No documentation was found on three of the eighteen cabinets and partial documentation found on four. All seven were reinspected and found acceptable.<br><br>As a result of the missing documentation, a review is being performed to determine other miscellaneous cases where Jones performed welding. Documentation for the welding identified will be reviewed. | 7/20 |      |          |     | All welding evaluated to date has been found acceptable. |

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| ISSUE & TITLE  | DESCRIPTION OF ISSUE  | LPAL APPROACH TO RESOLUTION  | DATE | NONE | FL TO 5Z | >5Z | JUSTIFICATION  |
|--|---|--|------|------|----------|-----|--|
| 10. Inspector Qualification (J. A. Jones and Fegles) | Verify the proper certification of QA/QC personnel and evaluate the impact of any deficiencies found. | <p>A reassessment of the adequacy of the program to certify inspectors will be performed for approximately 20% of all QC inspectors to assess the safety significance of the concern.</p> <p>Where deficiencies are identified, the inspections made by the subject QC personnel will be reviewed and an evaluation made of the safety significance with regard to design construction and operation. The need for additional corrective action will be assessed as part of the safety evaluation.</p> | 7/13 |      |          |     | Preliminary evaluations of J. A. Jones QC personnel qualifications questioned by the NRC indicate they were qualified and certified to perform their assigned work function. The sample size was twenty percent (20%). Nineteen of the 20 were qualified and one was qualified pending clarification. Additional backup information was requested from Fegles to complete the evaluation. It is important to note that the inspectors performed no non-destructive testing (NDT). NDT was provided by GEO. |

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| ISSUE & TITLE  | DESCRIPTION OF ISSUE  | LP&L APPROACH TO RESOLUTION   | DATE | NONE | PL TO 5% | >5% | JUSTIFICATION  |
|----------------|---|---|------|------|----------|-----|--|
| 11. Cadwelding | Provide the cadweld data for the project in such a form that it can be readily compared to the testing criteria used for the Waterford 3 project with data broken down by various categories. Provide data on welder qualification and requalification including dates. | <p>The cadweld records will be transcribed onto computer data storage including the placement number, cadweld number, bar size, bar position, visual inspection acceptance or rejection, production splice tensile test acceptance or rejection, and sister splice tensile test acceptance or rejection.</p> <p>In this form the cadweld data can be called up by any of these attributes to expedite review for specification compliance or other reason. Also, physical location of cadwelds may then be readily obtained by reference to the concrete placement lift diagrams which locate the placements.</p> <p>Data on welder qualification and requalification will be gathered and provided as part of this effort.</p> | 7/70 |      |          |     | Prior reviews have already been accomplished under NCR W3-6234 and non-conforming conditions resolved. |

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|---------------------------------------|--|--|------|------|----------|-----|--|
| 12. Main Steamline Framing Restraints | Complete the documentation for all connections in the steam generator framing. | SCD 78 was resolved and subsequently reopened upon discovery that inspections in one area were not complete. NCR-W3-7736 issued to track resolution of the deficiency. In order to assure complete resolution of this concern, LP&L initiated both a 100% QC reinspection of steam generator framing connections as well as a review of the American Bridge work scope against the scope of SCD 78 reinspections to assure that reinspections were complete.<br><br>All connections were reinspected. Requisite bolt replacement and NCR closure is scheduled to be completed by July 6, 1984. | 7/13 |      |          |     | The safety significance of not replacing the bolts which were replaced is still under evaluation. However, the actual restraint structure is not needed until the reactor generates power and therefore the bolting is not a constraint to fuel load or operations up to 5% power. |

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|------------------|--|--|------|------|----------|-----|---|
| 13. Missing NCRs | LP&L shall obtain the missing NCRs, explain why these NCRs were not maintained in the filing system, review them for proper voiding, and assure that when an issue is raised to an NCR, it is properly filed for tracking and closure. | <p>LP&amp;L is conducting a review of closed and voided Ebasco NCRs to determine if they are not properly indexed and filed in the QA records vault.</p> <p>The evaluation will identify all NCRs, which are indicated as closed or voided by site QA tracking mechanisms but not vaulted, and provide an explanation as to why they are missing, assure proper voiding, and assure proper filing and tracking.</p> <p>A similar evaluation is being conducted on NCRs which were issued by Ebasco QA in New York.</p> | 7/6  |      |          |     | <p>A review to date indicates that only five out of more than 7500 site-issued NCRs, which have been closed or voided, are not indexed and filed. Of the five NCRs which have not been indexed and filed, it can be demonstrated that they apparently were never issued. Sufficient documentation is on file to demonstrate the acceptability of the safety-related items described in the log entries corresponding to these five NCR numbers. The review indicates the problem stems from NCR tracking system utilized prior to mid-1979, and that since then the improved NCR tracking system has been adequate. In addition the review indicated that there were thirteen numbers that were apparently never assigned to an NCR. LP&amp;L is in process of confirming that NCRs with these numbers were never issued.</p> |

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| ISSUE & TITLE                          | DESCRIPTION OF ISSUE   | LP&L APPROACH TO RESOLUTION  | DATE | NONE | FL TO 5% | >5% | JUSTIFICATION  |
|--|--|--|------|------|----------|-----|--|
| 14. J. A. Jones Speed letters and EIRs | <p>During the Ebasco QA review of J. A. Jones speed letters and engineering information requests, several items that could affect plant safety were noted. Based on its sample of these actions, the staff does not expect that any of these items will significantly affect plant safety. Nevertheless, the applicant should complete the actions identified in these reviews and issues raised shall be resolved promptly.</p> | <p>First, a review has been conducted of correspondence between J. A. Jones and Ebasco via Speed letters and EIRs.</p> <p>Second, a review of such correspondence in which design changes were conveyed to J. A. Jones without reference to follow-up action to formalize the changes is being conducted to determine safety significance.</p> <p>Third, a minimum sample of ten percent of informal documents such as speed letters and EIRs by other contractors performing safety-related work who utilized these type of documents is being conducted. The need to review additional documentation will be determined based on the results of this review.</p> | 7/20 |      |          |     | <p>To date about 1100 pieces of JA Jones correspondence have been reviewed and 271 design changes identified. Of these, 190 have been approved as acceptable, 27 are the subject of field investigations to develop information for evaluation, and the balance are under review. To date no safety problems have been defined that would require rework.</p> <p>For other contractors, the review has shown that 8 of 42 Fegles, 3 of 119 Waldinger, and 2 of 660 T-B informal documents could involve design changes. These reviews are substantially complete and evaluations are in process.</p> |

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|--|--|--|------|-------------------|--|
| 15. Welding of "D" level Material Inside Containment | Locate the documentation for "D" level material welding and verify the adequacy of the information or perform a material analysis and NDE work, or rework the welds. | <p>LP&amp;L will conduct a review to confirm that material and weld rod records exist to establish material control for all "D" material welds; identify and verify the certification of all welders, and; provide inspection, procedures and data as well as affidavits from inspectors. Documentation will be tied to specific welds as much as possible. This will include identification of "D" material welds and compilation of:</p> <ol style="list-style-type: none"> <li>1) applicable CB&amp;I "as built" drawing number;</li> <li>2) identification of welds by piece mark numbers and material type (i.e. D to D, D to B, etc.);</li> <li>3) quantities for repetitious weld I.D.'s;</li> <li>4) weld type and size, and; 5) indication as to shop or field welds. LP&amp;L will evaluate the results and determine whether reinspections are required and what the scope of such a reinspection will be.</li> </ol> | 7/13 |                   | <p>The CB&amp;I QA manual requirements for documentation of fit-up and final weld inspections do not apply to "D" material welding although weld inspections were performed. The work was performed by the same welders and inspected by the same welding supervisors to the same standard as the rest of the CB&amp;I work for which documentation is provided. This provides a high degree of confidence in the quality of the finished work. Additionally very low rates of rejection in NDE tests and in independent surveillances and audits indicates high work quality.</p> |

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|---|---|--|------|------|----------|-----|---|
| 16. Surveys and Exit Interviews of QA Personnel | The NRC was critical of the manner in which a program of interviewing site QA/QC personnel in order to identify and take appropriate action regarding their concerns was conducted. | <p>The Interview forms have been personally reviewed by the Senior V.P.- Nuclear to assess whether the program met his intent and the basis for the NRC comments. Two further LP&amp;L staff actions remain.</p> <p>1) A review by the Independent Safety Evaluation Group (ISEG) primarily to assure that the concerns received during the interviews were or will be appropriately addressed and necessary corrective actions taken</p> <p>2) A determination as to the Scope and manner in which future methods of addressing issues raised by individuals are addressed.</p> | 7/9  |      |          |     | Reviews to date have not identified significant safety concerns not already identified. |

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|   |   |   |      |                   |  |  |   |
| 17. QC Verification of Expansion Anchor Characteristics | The NRC is concerned on whether there was sufficient QC verification of the characteristics necessary to ensure proper installation of concrete expansion anchors installed by Mercury. | The concern stems over the fact that a 1982 revision of an inspection form does not list the requisite QC inspection attributes. The initial review of this matter indicates that the requisite QC reviews were made as required by the drawings which accompanied the inspection forms. This was substantiated by a thorough review of Mercury quality records. LP&L will prepare a response discussing the incorporation of drawings into the procedure, training of Mercury personnel, the QC review and substantiation of records and a root cause evaluation of the problem. | 7/6  |                   |  |  | Initial reviews show that the requisite characteristics were part of the procedure (incorporated by drawings). This provides reasonable assurance that QC verification was adequate. Previously there were 896 re-inspections made of installed expansion anchor characteristics to confirm records validity. |

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| ISSUE & TITLE  | DESCRIPTION OF ISSUE  | LP&I APPROACH TO RESOLUTION   | DATE | NONE FL TO 5% >5% | JUSTIFICATION   |
|--|---|---|------|-------------------|---|
| 18. Documentation of Walkdowns of Non-Safety Related Equipment | Documentation should be provided that clearly shows what equipment was reviewed during the walkdowns and on what bases it was concluded that the installation was acceptable. | The response to this issue discusses the manner in which design and installation considered the effects of interactions of non-seismic with safety-related systems during an SSE. Documentation attesting to the scope, conduct and results of the review will be provided. | 7/6  |                   | <p>The design and construction of Waterford-3 considered interactions of non-seismic Mechanical, Electrical, HVAC, Civil and instrumentation equipment with safety-related equipment.</p> <p>The walkdown verified that such interactions do not constitute a safety concern.</p> |

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| ISSUE & TITLE                                 | DESCRIPTION OF ISSUE  | LP&L APPROACH TO RESOLUTION   | DATE | NONE | FL TO 5% | >5% | JUSTIFICATION   |
|---|---|---|------|------|----------|-----|---|
| 19. Water in Basement Instrumentation Conduit | Review all conduit that penetrates the basement and terminates above the top of the basement to assure that these potential direct access paths of water are properly sealed. | <p>A walkdown was performed which identified 19 places where wetness due to seepage from conduits was found. These cases will be addressed by removing the existing seals and replacing them with a light density silicone elastomer which has the capability to stop the seepage. This work will be performed at the convenience of LP&amp;L since the slow seepage through the seals is not a flooding hazard but rather a nuisance to maintenance.</p> <p>Temporary conduits which enter the basement from outside, and which once allowed passage of ground water in quantities that required periodic pumping, have now all been pressure grouted and their temporary blockout pits filled with concrete and no longer serve as a leak path for ground water.</p> <p>The one piezometer standpipe which remains in service will also be grouted since it monitors a deep aquifer of no present interest.</p> | 7/6  |      |          |     | There was never a path for ground water to flow in sufficient quantity to flood the auxiliary building basement, even before the seals were installed and before the temporary conduits were grouted. The floor drain and sump pump system was more than adequate to handle the quantity of water which entered the building during construction, and is adequate to handle the much reduced quantity presently observed. |

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| ISSUE & TITLE   | DESCRIPTION OF ISSUE   | LP&L APPROACH TO RESOLUTION  | DATE | NONE | FL TO 52 | >52 | JUSTIFICATION  |
|---|--|--|------|------|----------|-----|--|
| 20. Construction Materials Testing (CMT) Personnel Qualification Records. | Verify the proper certification of construction materials testing personnel. | LP&L is reviewing the supporting documentation for the corrective action of NCR-W3-F7-116 to ensure the adequacy of the corrective action. Additional supporting information will be sought as necessary in order to confirm adequate qualifications. Evaluation will be made of the adequacy of certifications for individual personnel and if certifications are judged inadequate, the implied safety concerns that are raised will be addressed. | 7/13 |      |          |     | Corrective action taken as a result of an LP&L Task Force verification effort on GEO documentation for CMT personnel qualifications (See NCR W3-F7-116). |

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| ISSUE & TITLE   | DESCRIPTION OF ISSUE  | LP&L APPROACH TO RESOLUTION  | DATE | NONE | FL TO 5% | >5% | JUSTIFICATION  |
|---|---|--|------|------|----------|-----|--|
| 21. LP&L Construction System Status and Transfer Reviews. | A concern exists over whether construction deficiencies were properly dispositioned or identified during the process of transferring systems from construction to plant operations. | A review of transfer correspondence on the systems which were the cause of this concern will be performed. A review will be conducted to verify that deficiencies in transferred systems had no impact on testing. | 7/6  |      |          |     | A review of 100% of turnover/transfer correspondence showed no additional correspondence was outstanding beyond that previously identified. Deficiencies identified on the outstanding correspondence (13 SUS) have been reviewed by LP&L start-up/operations and it was determined that there was no impact on testing. |

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|--|---|---|------|------|----------|-----|---|
| 22. Welder Qualification (Mercury) and Filler Material Control (Site Wide) | Verify welder qualifications or assure the quality of all welds.<br><br>Provide engineering justification for the allowance of "rebake" temperatures and holding times that differ from the requirements of the ASME and AWS Codes. | LP&L has conducted a review of all Mercury welders. The review confirmed that the documentation to support their proper qualification is available. Baking/rebaking is not allowed on the site and the complete answer will describe the site procedures and applicable code requirements and show that handling of filler material meets the required codes. | 7/6  |      |          |     | Documentation to support the proper qualification of all Mercury welders is available. NCR-W3-7724 was opened to document qualifications sheet errors for 3 welders.<br><br>No code deviations exist. |

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| ISSUE & TITLE  | DESCRIPTION OF ISSUE  | LP&L APPROACH TO RESOLUTION  | DATE | NONE | FL TO 5Z | 5Z TO 5Z | JUSTIFICATION  |
|--|---|--|------|------|----------|----------|--|
| 23. QA Program Breakdown between Ebasco and Mercury. | Determine the cause of the breakdown, the adequacy of the corrective action, and provide assurance on the adequacy of the operational QA Program. | <p>LP&amp;L will review corrective action commitments made on the NRC enforcement action and provide a detailed evaluation of the actions taken. A review of the audit programs will be performed to evaluate frequency and followup of required corrective actions of the program. The independent management assessments will be reviewed with actions taken.</p> <p>LP&amp;L will provide an assessment of the overall QA program to provide assurance that the QA program can function adequately during operations.</p> | 7/13 |      |          |          | The Mercury reviews have been completed with the exception of SCD-61 "Linear Crack in Stainless Steel Tubing"(currently under reevaluation). The review indicates that there are no open items affecting plant safety. |

PRELIMINARY



**LOUISIANA**  
**POWER & LIGHT**

317 BARONNE STREET • P.O. BOX 60340  
NEW ORLEANS, LOUISIANA 70160

• (504) 585-2204

June 20, 1984

J.M. CAIN  
President and  
Chief Executive Officer

W3B84-0445

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1200 Jadwin, Suite 425  
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Mr. Larry L. Humphries  
UNC Nuclear Industries, Inc.  
P.O. Box 490  
Richland, Washington 99352

SUBJECT: Pre-Licensing Issue Assessment  
Task Force Charter

REFERENCE: Discussions in the Offices of Shaw, Pittman,  
Potts & Trowbridge, Washington, D.C., June 13, 1984

Dear Messrs: Levine, Ferguson and Humphries:

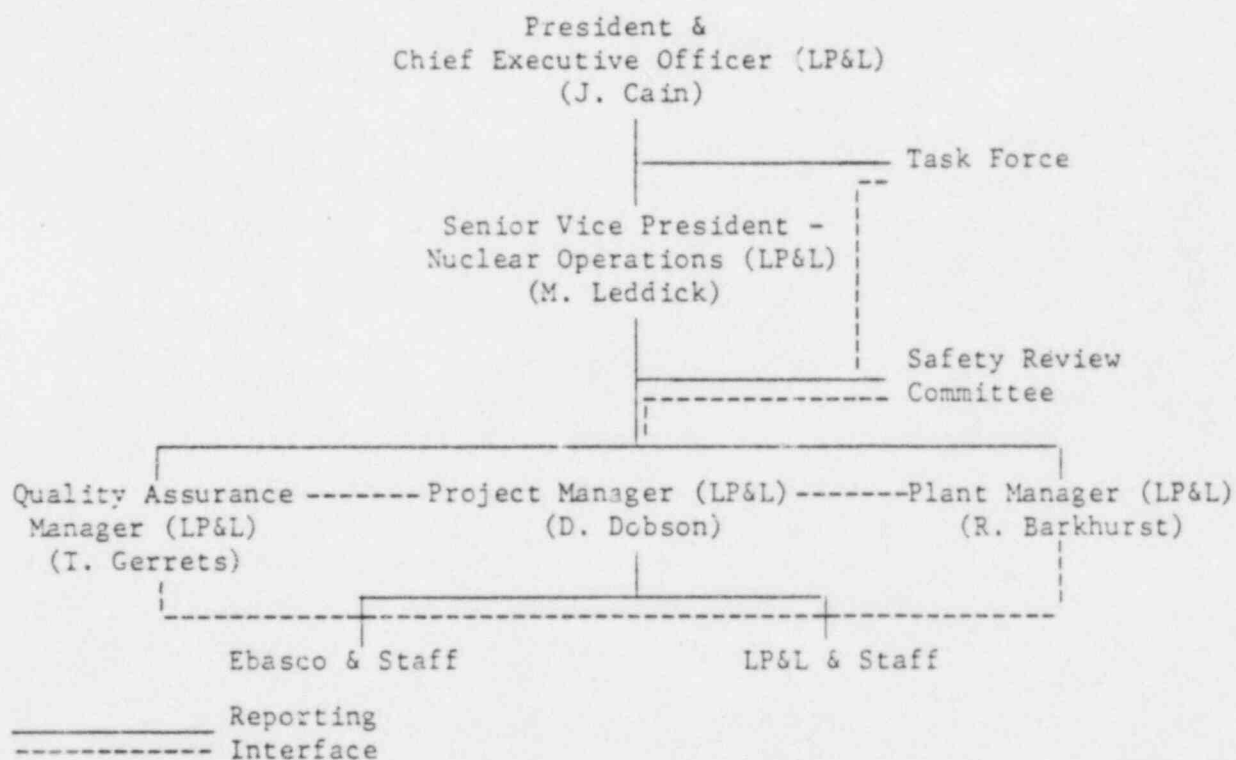
Pursuant to discussions in the referenced meeting, this formalizes agreements reached between us as to the charter of the subject Task Force.

The roles of UNC and NUS will be to act as a task force in providing assessment and advice in responding to the NRC letter of June 13, 1984. It is important to emphasize that both UNC and NUS will maintain sufficient independence in order to provide to me as Chief Executive Officer of LP&L an independent professional assessment regarding the functions listed below. Your assessments will be formalized and sent to the Director of the Office of Nuclear Reactor Operations at the same time they are provided to me.

- The Program Plan and implementation schedule requested in the NRC letter.
- The adequacy of responses and resolutions (including validation of data and sources, as appropriate) of the matters set out in the NRC letter.

- The safety significance of the matters listed in the NRC letter with respect to:
  - Fuel load and testing up to 5% power
  - Operation above 5% power
- The adequacy of the past QA/QC program in light of the matters listed in the NRC letter, and the resolution of such matters.
- Recommend institutional or programmatic changes that are deemed appropriate during plant operation in light of the lessons learned as a result of the matters set forth in the NRC letter, and the LP&L responses hereto.

The following abbreviated organization chart is provided to clearly depict that the Task Force is to have access to and interface with all necessary elements of the Waterford staff but is to report directly to me.



Very truly yours,

*J.M. Cain*  
J.M. Cain

JMC:DED:pb

cc: G. Charnoff, R.S. Leddick, D.E. Dobson



MIDDLE SOUTH  
UTILITIES SYSTEM

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DMC  
8/6

July 27, 1984

J.M. CAIN  
President and  
Chief Executive Officer

W3B84-0459

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

SUBJECT: Waterford 3 SES  
Revised Program Plan

Dear Mr. Eisenhut:

The purpose of this letter is to submit to you for your review and comment LP&L's revised program for resolution of the twenty-three (23) issues described in your letter of June 13, 1984. The enclosed program has been reviewed by the Safety Review Committee (SRC) Subcommittee and by the Task Force whose functions were described to you in my letter of June 28, 1984. Please note that our approach to resolution and our assessment of the 23 issues in the revised program plan reflect our current views and are subject to change based on NRC staff comments and our completion of these issues.

The SRC Subcommittee has been reconstituted and now consists of Ken Cook, Bob Douglass, Ray Burski and Joe Hendrie.

The schedule for submittal of our response to each issue is being discussed by our staffs. The majority of the responses are in near final form and I hope to have all responses as well as our assessment of the collective significance and the intended programmatic changes submitted by mid-August.

Sincerely,

*J.M. Cain*  
J.M. Cain

JMC:DA:pbs

Attachments

~~DOPE  
84 08020033~~

208  
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Mr. Darrell Eisenhut, Director  
W3B84-0459  
July 27, 1984

Page 2

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July 23, 1984

WATERFORD 3  
PROGRAM PLAN AND SCHEDULE

I. INTRODUCTION AND PURPOSE

This Program Plan outlines the methods by which the 23 individual issues described in the NRC letter, Docket No. 50-382, dated June 13, 1984, are to be resolved by LP&L. Further, the Plan provides a mechanism to address the cause of the issues, the generic implications and collective significance of the issues, and the programmatic and management changes designed to preclude recurrence of such issues. The Program includes a separate review of the resolutions by the Waterford 3 Safety Review Committee (SRC) Subcommittee and the establishment of an independent Task Force to advise LP&L and evaluate LP&L's resolution of the issues.

II. PROGRAM PLAN MANAGEMENT

1. The LP&L Project Manager - Nuclear is assigned responsibility for management of the overall Plan and actions outlined in paragraphs III and IV below. He will perform these tasks in a normal line management role and have access to and the support of any requisite LP&L and contractor managers and staffs on a top priority basis. He will assure effective interfaces with external groups including the SRC and the UNC/NUS Task Force described in paragraph VI below.
2. The Project Manager - Nuclear reports directly to the Senior Vice President - Nuclear, who in turn reports directly to the President and Chief Executive Officer of LP&L. Both the Senior Vice President - Nuclear and the CEO are directly and actively involved in the management of the Program.

III. RESOLUTION OF ISSUES

1. Each issue will be analyzed to determine:
  - The cause
  - The generic implication
  - The actions and schedules to correct both the specific problem and related generic concerns
  - The safety significance with respect to fuel load and low power operation, and to operation above 5% power

2. The intended manner in which each of the 23 issues are to be addressed is described in Attachment 1. It should be noted that the manner of resolution may need modification as actions necessary to resolve any related safety concerns are undertaken or additional sources of information become available.

#### IV. COLLECTIVE SIGNIFICANCE AND PROGRAMMATIC CHANGES

As early as feasible in the process of formulating the information contained in paragraph III above, the LP&L Project Manager - Nuclear will:

1. assess the collective significance of the individual issues, and
2. recommend institutional or programmatic changes deemed appropriate to avoid recurrence of the types of problems underlying the issues being addressed.

#### V. SAFETY REVIEW COMMITTEE

1. The Waterford 3 Safety Review Committee (SRC) has designated an SRC subcommittee to review the items outlined in paragraph III and IV above.
2. The SRC subcommittee consists of Kenneth W. Cook, LP&L Nuclear Support and Licensing Manager, Chairman; Joseph M. Hendrie, Consulting Engineer; Robert M. Douglass, Manager of Quality Assurance, Baltimore Gas and Electric Company; and Raymond F. Burski, LP&L Engineering and Nuclear Safety Manager.

#### VI. INDEPENDENT ASSESSMENT

1. An independent assessment of the resolutions and determination of safety significance will be provided by a Task Force reporting directly to the CEO of LP&L. The Task Force consists of officials of UNC Nuclear Industries, Inc., Richland, Washington, and NUS Corporation, Gaithersburg, Maryland, who will be assisted by UNC and NUS staff members, as required. The Task Force will independently assess LP&L's resolution of the issues, including the cause, generic implications and collective significance of the issues. The Task Force will also provide advice and assistance in the resolution of the issues, and will provide an independent assessment of the safety significance of the issues with respect to fuel loading and low power testing, and operation above 5% power. It will assess the adequacy of LP&L QA/QC program in light of the NRC's issues, and will recommend any institutional or programmatic changes which may be necessary to prevent recurrence of the issues.

2. The charter, identification of principals, initial functions have been formalized, as specified in Attachment 2 hereto.

#### VII. RESPONSE TO NRC

The individual issues vary considerably in both the degree of concern and complexity of resolution. Therefore, LP&L intends to forward to the NRC the proposed resolution data individually or in packages as they are completed and have undergone the degree of review specified herein. Some of the resolutions may be submitted before completion of all requisite corrective actions, which are underway or defined and scheduled for accomplishment, have been accomplished. Upon submittal, each resolution will be added as Appendix A of the Program Plan to constitute a major part of the final report.

#### VIII. SCHEDULE

The goal of LP&L is to submit by mid-August 1984, the resolution of all issues, our assessment of the collective significance of those issues, and the programmatic changes deemed necessary to avoid recurrence of those issues which indicate such changes are appropriate.

# PROGRAM PLAN

| ISSUE & TITLE                  | DESCRIPTION OF ISSUE  | LP&L APPROACH TO RESOLUTION  | CURRENT ASSESSMENT |
|--------------------------------|---|--|--------------------|
| 1. Inspection Personnel Issues | Verify the proper certification of site QA/QC personnel or requalify the work performed by these personnel. | <p>A verification program has been established to review the professional credentials of 100% of the site QA/QC personnel, including supervisors and managers. The discussion that follows applies to all contractors except J.A. Jones, Fegles and GEO, which are addressed in Issues 1D and 2D. Criteria for certification or qualification of QA/QC personnel will be based on QA program requirements and contractual commitments.</p> <p>The adequacy of credentials to support certifications and qualifications is being reviewed. Criteria have been established to sort personnel files into 3 groups:</p> <ul style="list-style-type: none"> <li>A. Qualifications deemed adequate</li> <li>B. Inadequate documentation to perform evaluation</li> <li>C. Qualifications questionable.</li> </ul> <p>Other site files will then be researched and contractors contacted for personnel in groups B and C to verify their acceptability. In addition, background investigations will be performed for a sample of personnel in all groups, including essentially all Mercury personnel and a large sample of Tompkins- Beckwith personnel. If certification of an individual can not be justified, he will be placed in a fourth group designated group D (Qualification inadequate). Appropriate site nonconformance documentation will be initiated to document evaluation of safety significance and corrective actions, including reinspections of work performed as necessary.</p> <p>For Ebasco, LP&amp;L, and other site construction related QA/QC personnel remaining on site, a reverification of proper certification is being accomplished in accordance with ANSI-N45.2.6-1973. Quality Control functions currently being undertaken as part of the walkdowns in progress are being performed by personnel reverified as qualified under ANSI-N45.2.6-1973.</p> | To Be Determined   |

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| ISSUE & TITLE                               | DESCRIPTION OF ISSUE  | LP&L APPROACH TO RESOLUTION   | CURRENT ASSESSMENT  |
|---|---|---|---|
| 2. Missing NI Instrument Line Documentation | Verify compliance with NRC requirements for NI instrumentation installations. | <p>Prior to the NRC inspection, the Ebasco Quality Assurance Installation Records Group had reviewed the ASME Section III portions of the NI instrument installations. Full documentation on the installations under the scope of this review is available.</p> <p>The scope of this concern has been narrowed to 12 installations, 4 welded and 8 threaded. The documentation on the ANSI B31.1 portions of these instrument installations that were installed with class breaks (i.e. ASME Section III to ANSI B31.1) has also now been reviewed and is summarized as follows:</p> <ol style="list-style-type: none"> <li>1. Final visual inspection documentation is now available.</li> <li>2. Ten installations have documented hydrostatic tests. The remaining two are HVAC welded connections and do not require hydrostatic testing.</li> <li>3. Material traceability to the point of installation is not available, however, Certificates of Conformance to specification requirements are available.</li> <li>4. Welder identifications are not available in all cases. However, all Mercury welders were required by procedure to demonstrate qualification for the appropriate welding process prior to being issued weldrod.</li> <li>5. Nondestructive testing data is not required for these installations.</li> </ol> <p>We have considered other design changes related to the classification of NI instrument loops and have concluded that a similar situation has not occurred.</p> | The combination of the reviews described has provided assurance that documentation is available to assure the quality installation of all NI instruments. |

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| 3. Instrumentation<br>Expansion Loop<br>Separation | Correct separation criteria violations found in system 52A and provide a program for review of other safety-related systems for separation violations and take the necessary corrective actions. | <p>NCR-W3-7702 covers the system 52A problems and has been dispositioned to remove the expansion loops in question and replace with straight tubing.</p> <p>NCR-W3-7730 was generated to track the generic concern of tubing separation. In order to provide a basis for determining the scope of our approach, a sample of 45 additional instrument installations was reinspected. Those chosen were in congested areas where separation violations would have the highest probability of occurrence. Thirteen deficiencies were found out of 276 locations, and were evaluated. None required rework.</p> <p>A QC verification of all other lines (approximately 64) with redundant tubing runs in proximity of each other will be performed.</p> | <p>Although separation violations have been found, none so far identified would affect plant safety had they been left uncorrected.</p> <p>This provides a high level of confidence that other design considerations and walkdowns (i.e. pipe rupture/jet impingement analysis, non-seismic over seismic criteria and walkdowns) in combination with the tubing separation criteria have provided adequate protection for the instrument installations.</p> <p>A final determination of safety significance will be made upon completion of the reinspection.</p> |

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| 4. Lower Tier Corrective Actions Are Not Being Upgraded to NCRs | <p>LP&amp;L shall review all FCRs, DCNs, EDNs, and T-B DNs to assure that proper corrective action was taken, including an adequate review by QA. This corrective action shall include the steps required by 10CFR50, Appendix B, Criterion XVI Corrective Action and for Construction Deficiency Reporting, 50.55(e). Also, included in this review shall be the examination of improper voiding of all other design changes or discrepancy notices that affected safety-related systems or that were misclassified as safety.</p> | <p>LP&amp;L has to date reviewed all FCRs, DCNs, EDNs and Tompkins-Beckwith DNs cited by the NRC in the Description of Concern, as well as all voided EDNs.</p> <p>LP&amp;L's review has established that only two of the fourteen cited FCRs/DCNs and three of the 22 cited EDNs and T-B DNs should have required an NCR. In each case however, there was no safety significance as regards 10CFR50.55e and 10CFR21. None of the voided EDNs required an NCR that was not generated.</p> <p>The response to this concern will provide an assessment of the lower tier document reporting system. It will verify that it was structured in such a manner that procedures, integral to the Quality Program, provided a sound basis for decisions regarding the severity level of documents used to report deficiencies. The assessment specifically considers QA and QC reviews of engineering/construction judgements on deficiencies as it relates to the corrective action and nonconformance requirements of 10 CFR 50 Appendix B and the reporting requirements of 10 CFR 50.55(e).</p> <p>A random sample of approximately 700 FCRs, DCNs, EDNs and T-B DNs will be formally reviewed to determine if any should in fact have been reported as NCRs. Any so judged will then be reviewed for reportability under 10CFR50.55e and 10CFR21.</p> <p>The results of this review will dictate whether there is a need to expand the sample size.</p> | <p>The current review has demonstrated that there has been adequate QA/QC involvement in all lower tier documents with regard to 10CFR50, Appendix B corrective action and non-conformance requirements. This involvement ensures that appropriate corrective actions, specific and generic, are identified.</p> <p>Our current evaluation of the examples of lower tier documents cited by the NRC demonstrates that although a small percentage should have been upgraded to NCR's under the quality program in effect, none had safety significance.</p> <p>Thus, LP&amp;L has confidence that the sample review will provide additional evidence that the projects' system of "checks &amp; balances" ensures that, despite isolated cases of judgemental or interpretative errors, all lower tier documents, as well as FCRs and DCNs receive adequate evaluation for safety significance.</p> |

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| 5. Vendor Documentation Conditional Releases | The concern relates to whether shortcomings in contractor's documentation, particularly Combustion Engineering's, which existed at the time the material was supplied have been corrected. | <p>Records associated with CE material and equipment were re-reviewed and Conditional Certifications identified. An assessment of the potential for the existence of other manufacturing open items not being tracked in the Master Tracking System (MTS) was conducted. It led to the conclusion that the potential for a similar situation existed only in areas where problems are identified off-site relating to material to be shipped to the site. As a result of this concern the following areas are being evaluated:</p> <ul style="list-style-type: none"> <li>* Concerns noted by vendor QA Reps on Release for shipment forms.</li> <li>* NCRs controlled by Ebasco's Home Office</li> <li>* Material received at the site under manufacture, deliver and erect type contracts.</li> </ul> <p>To date 8 of 14 CE Conditional Certifications have been changed to unconditional. The remaining 6 will have Unconditional Certifications by 9/15/84. The issues that required resolution deal with technical manuals and have no effect on equipment operation.</p> <p>The review conducted on the other three areas of potential concern is nearing completion.</p> | <p>The existence of Conditional Certifications on CE equipment reflected incomplete Purchase Orders, not hardware or software deficiencies.</p> <p>No items of safety significance have been found thus far on the other three areas of concern.</p> |

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| 6. Dispositioning of Non-conformance and Discrepancy Reports | <p>JUL 27 1984</p> <p>Some Ebasco and Mercury NCRs and Ebasco DRs were questionably dispositioned and LP&amp;L shall propose a program to assure all NCRs and DRs are appropriately upgraded, adequately dispositioned and corrective action completed and that any problems detected are corrected.</p> | <p>First, the in-place program for handling of lower tier documents such as DRs will be discussed.</p> <p>Second, the specific NCRs and DRs cited by the NRC have been evaluated for proper designation, disposition, and implementation of corrective action under the existing quality program. Six of the fifty NCRs were determined to not have been adequately dispositioned and are under evaluation.</p> <p>Third, a program review of Ebasco NCRs was started by LP&amp;L in January, 1984 to assess the validity of the disposition, the corrective action taken, the completeness of the documentation, and their proper closure. Approximately 460(6%) of the more than 7700 NCRs reviewed have been identified as having potential deficiencies in the above attributes. These are being evaluated. The deficiencies that have thus far been evaluated have no safety significance.</p> <p>Fourth, a field verification will be conducted on a random sample of 122 (over 25%) of the potentially deficient Ebasco NCRs to ensure that the hardware and/or software corrective action has been completed.</p> <p>Finally, the Mercury NCR's and Ebasco DR's cited by the NRC have been reviewed against the attributes mentioned in the concern. Information from this review is currently being evaluated.</p> | <p>To date none of the potentially deficient NCRs that have been reviewed and evaluated have safety significance.</p> <p>A final determination of safety significance will be made upon completion of the evaluations of potentially deficient NCRs and the field verification.</p> |

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| 7. Backfill Soil<br>Densities | Conduct a review of all<br>soil packages for<br>completeness and<br>technical adequacy.<br>Where records are<br>missing or technical<br>problems are defined,<br>take corrective action. | <p>A review of backfill records (i.e. backfill soil density laboratory test data and inspection reports) was initiated to determine completeness and technical adequacy. A three stage program for the evaluation of soil backfill densities was implemented to (a) locate all backfill soil data, (b) review the test records for completeness and utilize these for the construction of relative density overlay plots, and (c) evaluate documentation and overlays for compliance with specification requirements.</p> <p>It was determined that a complete set of soils test data exists at the site, and that the field and laboratory testing and insitu relative density of the class A backfill were in compliance with specification requirements.</p> <p>A review for completeness of the remainder of the soil package data for attributes other than density, which includes all inspection reports, is presently being performed.</p> | The soil density is in compliance<br>with specification requirements. |

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| 8. Visual Examination of Shop Welds during Hydrostatic Testing | Document inspections of shop welds during hydro tests or otherwise verify such inspection. | <p>Shop welds were inspected and accepted during hydrostatic tests by an Authorized Nuclear Inspector.</p> <p>The ASME N-5 code data reports also confirmed that there was inspection of shop welds.</p> <p>The methodology of the field hydrostatic tests provided additional assurance that shop welds were inspected.</p> | No deficiency exists. |

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| 9. Welder Certification | <p>Locate missing documents for instrument cabinet welds and determine if welders were appropriately certified. Take appropriate action to assure the quality of the supports if documentation cannot be located.</p> | <p>NCR W3-7549 was generated on 2/1/84 to track this problem. No documentation was found on three of the eighteen cabinets and partial documentation found on four. All seven were reinspected and found acceptable after evaluation by Engineering.</p> <p>As a result of the missing documentation, a review is being performed to determine other miscellaneous cases where J.A. Jones performed welding. Documentation for the welding identified will be reviewed.</p> | <p>All welding evaluated to date has been found acceptable. A final determination of safety significance will be made upon completion of the review.</p> |

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| 10. Inspector Qualification (J. A. Jones and Fegles) | Verify the proper certification of QA/QC personnel and evaluate the impact of any deficiencies found. | <p>A verification program has been established to review the professional credentials of 100% of the site QA/QC personnel for J.A. Jones and Fegles, including supervisors and managers. Criteria for certification or qualification of QA/QC personnel will be based on QA program requirements and contractual commitments.</p> <p>The adequacy of credentials to support certifications and qualifications is being reviewed. Criteria have been established to sort personnel files into 3 groups:</p> <ul style="list-style-type: none"> <li>A. Qualifications deemed adequate</li> <li>B. Inadequate documentation to perform evaluation</li> <li>C. Qualifications questionable</li> </ul> <p>Other site files will then be researched, and J.A. Jones and Fegles contacted for personnel in groups B and C to verify their acceptability. In addition, background investigations will be performed for a sample of personnel in all groups. If certification of an individual cannot be justified, he will be placed in a fourth group designated group D (Qualification inadequate). Appropriate site nonconformance documentation will be initiated to document evaluation of safety significance and corrective actions, including reinspection of work performed as necessary.</p> | To Be Determined   |

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| 11. Cadwelding | Provide the cadweld data for the project in such a form that it can be readily compared to the testing criteria used for the Waterford 3 project with data broken down by various categories. Provide data on welder qualification and requalification including dates. | <p>The cadweld records have been transcribed onto computer data storage. This includes the placement area, cadweld number, cadwelder, bar size, bar position, visual test, production test, sister test, cadwelder qualification dates and inspector name and qualification dates.</p> <p>In this form the cadweld data can be called up by any of these attributes to expedite review for specification compliance or other reason. Also, physical location of cadwelds may then be readily obtained by reference to the concrete placement lift diagrams which locate the placements.</p> <p>Prior reviews have already been accomplished under NCR W3-6234 (opened 5/16/83) and nonconforming conditions resolved. A re-evaluation is being conducted now that the cadweld data is in a more systematic, auditable format.</p> | Based on the previous disposition of NCR W3-6234, there is no reason to anticipate any significant deficiency. |

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| 12. Main Steamline<br>Framing Restraints | Complete the document-<br>ation for all<br>connections in the<br>steam generator framing. | <p>SCD 78 was resolved and subsequently reopened upon discovery that inspections in the steam generator framing were not complete. NCR-W3-7736 was issued to track resolution of the deficiency. A 100% QC reinspection of steam generator framing connections as well as a review of the American Bridge work-scope against the scope of SCD 78 reinspections was performed.</p> <p>This verified that only steam generator framing connections were omitted from the original scope of SCD 78. All corrective action has been completed.</p> | All corrective action has been completed in accordance with the criteria stated in the SCD 78 Documentation Package. |

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| 13. Missing NCRs | <p>LP&amp;L shall obtain the missing NCR's, explain why these NCR's were not maintained in the filing system, review them for proper voiding, and assure that when an issue is raised to an NCR, it is properly filed for tracking and closure.</p> | <p>The concern specifically stated that there were 10 NCR numbers missing from the QA vault and card index file. This is correct and is due to the fact that all of these NCRs were voided or cancelled prior to issuance as indicated in the manual log that was maintained at that time. The purpose of the card index file is to locate NCRs which are actually on file in the vault, not those that were voided or never issued.</p> <p>However, in response to the NRC's general statement that "Others were also noted to be missing from the Ebasco QA Vault", LP&amp;L has:</p> <p>*Reviewed for accountability all Ebasco Site and New York Office issued closed or voided NCRs for accountability (8200 total NCRs).</p> <p>*Provided substantiating evidence on those NCRs indicated as void in the logs.</p> <p>*Provided substantiating evidence that NCR numbers in the sequence indicated not to have been assigned to an NCR is correct.</p> | <p>As a result of the review, all NCRs not on file in the QA vault were either found, located or probably not issued.</p> |

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| 14. J. A. Jones Speed letters and EIRs | <p>During the Ebasco QA review of J. A. Jones speed letters and engineering information requests, several items that could affect plant safety were noted. Based on its sample of these actions, the staff does not expect that any of these items will significantly affect plant safety. Nevertheless, the applicant should complete the actions identified in these reviews and issues raised shall be resolved promptly.</p> | <p>First, a review has been conducted of correspondence between J. A. Jones and Ebasco via Speed letters and EIRs. Second, correspondence which conveyed design changes to J. A. Jones without reference to follow-up action to formalize the changes was conducted to determine safety significance.</p> <p>Of approximately 1100 J.A. Jones documents reviewed, 271 appear to convey design changes. These 271 have been evaluated and researched on a case-by-case basis and determined to be acceptable as is even though they represent a procedure violation. No safety problems have been identified.</p> <p>Third, a minimum of 10% of engineering information requests generated by other safety-related contractors was sampled to determine if they used design changes conveyed by such informal documents. The sample size was expanded depending on the results of the initial review.</p> <p>Fourth, any design changes identified are being reviewed for safety significance.</p> <p>The initial review of the other safety related contractors has been completed. No safety related problems have been identified to date.</p> <p>Additional sampling is being performed on three contractors.</p> | <p>No problems of safety significance were found in the J.A. Jones correspondence. The review of other contractors is nearing completion and no problems of safety significance have been found to date.</p> |

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| 15. Welding of "D" level Material Inside Containment | Locate the documentation for "D" level material welding and verify the adequacy of the information or perform a material analysis and NDE work, or rework the welds. | <p>The CB&amp;I QA manual requirements for documentation of fit-up and final weld inspections do not apply, per their manual, to "D" material welds. This documentation is therefore not available for all "D" material welds.</p> <p>The "D" material welds were performed by the same welders and inspected by the same welding supervisors and to the same standards as the rest of the CB&amp;I work for which documentation is provided. Considering this, and the quality of CB&amp;I work on this project, it is not expected that any quality problem exists with "D" material welds. LP&amp;L will, however, in accordance with a formal QA procedure:</p> <ul style="list-style-type: none"> <li>* Strip paint off of a 5% sample of "D" material welds for which no documentation is available and provide full visual inspection.</li> <li>* Reinspect another 5% sample of "D" material welds without stripping paint.</li> </ul> <p>The results of this reinspection will determine if there is a need to expand the sample size.</p> <p>To address the NRC's specific concerns, Ebasco has evaluated the containment spray piping weld attachments. All containment spray piping weld attachments were installed and documented by Tompkins-Beckwith except for two. The results so far demonstrate that failure of these two welds will not preclude the piping from performing its design basis function. Ebasco is presently finalizing the analysis by redistributing the loads to other supports under the assumption that the two "D" level attachments do not exist.</p> | Preliminary results from the ongoing inspection indicate that the "D" material welds are acceptable. A final determination of safety significance will be made upon completion of the reinspection. |

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| 16. Surveys and Exit Interviews of QA Personnel | LP&L should develop and implement a formal program for handling issues raised by individuals. One of the first tasks to be dealt with by the program should be the review of the responses previously provided to the QA survey and during the exit interviews. | LP&L has secured the services of Quality Technology Company (QTC) to implement an enhanced program to conduct exit interviews of personnel departing the site. QTC will also review the interviews conducted to date to assess whether the corrective actions for the concerns identified thereon are appropriate. Procedures have been approved which assure management involvement. | Reviews to date have not identified safety concerns not already identified. |

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| 17. QC Verification of Expansion Anchor Characteristics | The NRC is concerned whether there was sufficient QC verification of the characteristics necessary to ensure proper installation of concrete expansion anchors installed by Mercury. | <p>The review of this matter indicates that six of the seven cited QC reviews were made as required by the drawings which were referenced on the inspection forms. This was substantiated by a thorough review of Mercury quality records. LP&amp;L will prepare a response discussing the incorporation of drawings into the procedure, training of Mercury personnel, the QC review and substantiation of records and evaluation of the cause of the problem.</p> <p>The seventh attribute cited by the NRC is spacing between anchor and embedded plate. The response will refer to Ebasco design drawings which allow anchor plates to overlap and be welded to embedded plates. It will also provide the results of an analysis performed on worst case situations of Mercury anchor plates butting up against embedded plates of different sizes which demonstrates that the anchor and embedded plates are still capable of withstanding the original design loads.</p> <p>Based on the above discussion and our review, no additional reinspection is believed necessary.</p> <p>No revision is necessary to procedure SP-666 since this procedure is no longer in use at the site.</p> | The review of Mercury QA records conducted by Ebasco prior to LP&L turnover, the resultant field verifications, and the directions provided by the documents referenced in the Mercury Expansion Anchor Procedure provide assurance that QC verification was adequate. |

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| 18. Documentation of Walkdowns of Non-Safety Related Equipment | Documentation should be provided that clearly shows what equipment was reviewed during the walkdowns and on what bases it was concluded that the installation was acceptable. | Documentation attesting to the scope, conduct and results of the walkdowns will be provided.<br><br>The response to this issue will also establish that in our opinion, the design and installation adequately considered the effects of interactions of non-seismic with safety-related systems during an SSE. | The design and construction of Waterford-3 considered interactions of non-seismic Mechanical, Electrical, HVAC, Civil and Instrumentation equipment with safety-related equipment.<br><br>The walkdown verified that such interactions do not constitute a safety concern. |

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| 19. Water in Basement Instrumentation Conduit | Review all conduit that penetrates the basement and terminates above the top of the basement to assure that these potential direct access paths of water are properly sealed. | <p>A walkdown was performed which identified 28 places where wetness due to seepage from conduits was found and 12 places where evidence of past leaking from conduits was found. Neither the present slow seepage thru some of the seals nor the seepage that would result from a gross failure of the seals presents a flooding hazard. The decision to replace the seals will be based strictly on operational and maintenance considerations. Any replacement seals will consist of a light density silicone elastomer which has the capability to stop the seepage.</p> <p>Temporary conduits which enter the basement from outside, and which once allowed passage of ground water in quantities that required periodic pumping, have now all been pressure grouted and their temporary blackout pits filled with concrete and no longer serve as a leak path for ground water.</p> <p>Two piezometers still in use utilize one riser which will be sealed with a light density silicone elastomer. The standpipe of one piezometer no longer in use will be pressure grouted.</p> | There was never a path for ground water to flow in sufficient quantity to flood the auxiliary building basement, even before the seals were installed and before the temporary conduits were grouted. The floor drain and sump pump system was more than adequate to handle the quantity of water which entered the building during construction, and is adequate to handle the much reduced quantity presently observed. |

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| ISSUE & TITLE   | DESCRIPTION OF ISSUE   | LP&L APPROACH TO RESOLUTION   | CURRENT ASSESSMENT  |
|---|--|---|---|
| 20. Construction Materials Testing (CMT) Personnel Qualification Records. | Verify the proper certification of construction materials testing personnel. | <p>GEO has been contacted to assist in providing additional background information or justification for certification of QA/QC personnel identified as part of NCR #W3-F7-116.</p> <p>A verification program has been established to review the professional credentials of 100% of the GEO CMT site QA/QC personnel, including supervisors and managers. Criteria for certification or qualification of QA/QC personnel will be based on QA program requirements and GEO's contractual requirements.</p> <p>The adequacy of credentials to support certifications and qualifications is being reviewed. Criteria has been established to sort personnel files into 3 groups.</p> <p>A. Qualifications deemed adequate.<br/> B. Inadequate documentation to perform evaluation.<br/> C. Qualifications questionable</p> <p>Other site files will then be researched, and GEO contacted for personnel in groups B and C to verify their acceptability. In addition, background investigations will be performed for a sample of personnel in all groups. If certification of an individual can not be justified, he will be placed in a fourth group designated Group D (Qualification inadequate). Appropriate site nonconformance documentation will be initiated to document evaluation of safety significance and corrective actions, including reinspection of work performed as necessary.</p> <p>For GEO QC Inspectors remaining on site, a reverification is being completed of proper certification in accordance with ANSI-N45.2.6-1973.</p> | <p>The initial evaluation of this concern indicated "no safety significance" based on evaluation of nonconformance report #W3-F7-116. We are again reviewing the qualifications of QA/QC personnel on the nonconformance report and others to reconfirm our initial evaluation.</p> |

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PROGRAM PLAN

| ISSUE & TITLE   | DESCRIPTION OF ISSUE   | LP&L APPROACH TO RESOLUTION   | CURRENT ASSESSMENT  |
|---|--|---|---|
| 21. LP&L Construction System Status and Transfer Reviews. | A concern exists over whether construction deficiencies were properly closed out or identified during the process of transferring systems from construction to plant operations. | <p>A review of transfer correspondence on the systems which were the cause of this concern has been performed. A review has also been conducted to verify that deficiencies in transferred systems had no impact on testing.</p> <p>A review was also conducted of hardware and software comments generated during status and transfer of safety-related systems.</p> | <p>A review of 100% of turnover/transfer correspondence showed no additional correspondence was outstanding beyond that previously identified. Deficiencies identified on the outstanding correspondence (13 SUS) have been reviewed by LP&amp;L start-up/operations and it was determined that there was no impact on testing.</p> |

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PROGRAM PLAN

| ISSUE & TITLE  | DESCRIPTION OF ISSUE   | LP&L APPROACH TO RESOLUTION  | CURRENT ASSESSMENT  |
|--|--|--|---|
| 22. Welder Qualification (Mercury) and Filler Material Control (Site Wide) | <p>Verify welder qualifications or assure the quality of all welds.</p> <p>Provide engineering justification for the allowance of "rebake" temperatures and holding times that differ from the requirements of the ASME and AWS Codes.</p> | <p>The welder documentation is available which demonstrates that the welders were properly qualified.</p> <p>The response summarizes the site requirements for handling of welding electrodes and demonstrates that ASME code requirements are met; and that AWS D1.1 code requirements, through a documented deviation to the holding oven temperature, are also met.</p> | <p>All welders were found to be properly qualified. NCR-W3-7724 addressed and resolved qualification sheet errors for 3 welders (clerical errors which were committed after the welders left site).</p> <p>Code requirements for receiving shipping, storage and issuing and control of welding electrodes were met.</p> <p>The only deviation from explicit code requirements was a documented reduction in specified holding oven temperatures.</p> |

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PROGRAM PLAN

| ISSUE & TITLE  | DESCRIPTION OF ISSUE  | LP&L APPROACH TO RESOLUTION  | CURRENT ASSESSMENT  |
|--|---|--|---|
| 23. QA Program Breakdown between Ebasco and Mercury. | LP&L shall provide an assessment of the overall QA program and determine cause of the breakdown, together with corrective action to prevent recurrence. This overall assessment is necessary to provide assurance that the QA program can function adequately when the plant proceeds into operation. | <p>First, LP&amp;L is conducting a thorough review of the corrective actions associated with the 1982 NRC enforcement actions and civil penalty to determine the adequacy of follow-up related to corrective action commitments.</p> <p>Second, LP&amp;L is conducting a thorough review of its QA audit program which has been in effect since July 1982. Particular attention will be placed on audits related to Mercury activities. This review will include an evaluation of the methods used for determining cause of identified problems and the systems used to assure effective follow-up and continued compliance with corrective action commitments.</p> <p>Third, LP&amp;L is performing an overall assessment of the LP&amp;L QA construction program based on the results of the above reviews to identify lessons learned and to determine if any improvements are required to assure adequacy of future operational QA program activities.</p> <p>The above actions are ongoing. Based on efforts to date, it is believed that LP&amp;L can demonstrate that the extensive management and quality assurance actions taken by LP&amp;L, Ebasco and Mercury subsequent to June, 1982, were appropriate; that most of the problems identified were part of the corrective actions on work previously done and are not indicative of continued inferior performance; and that the partial program breakdown did not persist.</p> | To date the specific issues involve inadequate or inconsistent closure documentation, and not hardware impacting concerns. Thus far the review indicates that there are no open items affecting plant safety. |

JUL 27 1984



**LOUISIANA**  
**POWER & LIGHT**

317 SARONNE STREET • P.O. BOX 60340  
NEW ORLEANS, LOUISIANA 70160

• (504) 585-2204

June 20, 1984

J.M. CAIN  
President and  
Chief Executive Officer

W3B84-0445

Mr. Saul Levine  
NUS Corporation  
910 Clopper Road  
Gaithersburg, Maryland 20878

Mr. Robert L. Ferguson  
UNC Nuclear Industries, Inc.  
1200 Jadwin, Suite 425  
Richland, Washington 99352

Mr. Larry L. Humphries  
UNC Nuclear Industries, Inc.  
P.O. Box 490  
Richland, Washington 99352

SUBJECT: Pre-Licensing Issue Assessment  
Task Force Charter

REFERENCE: Discussions in the Offices of Shaw, Pittman,  
Potts & Trowbridge, Washington, D.C., June 13, 1984

Dear Messrs: Levine, Ferguson and Humphries:

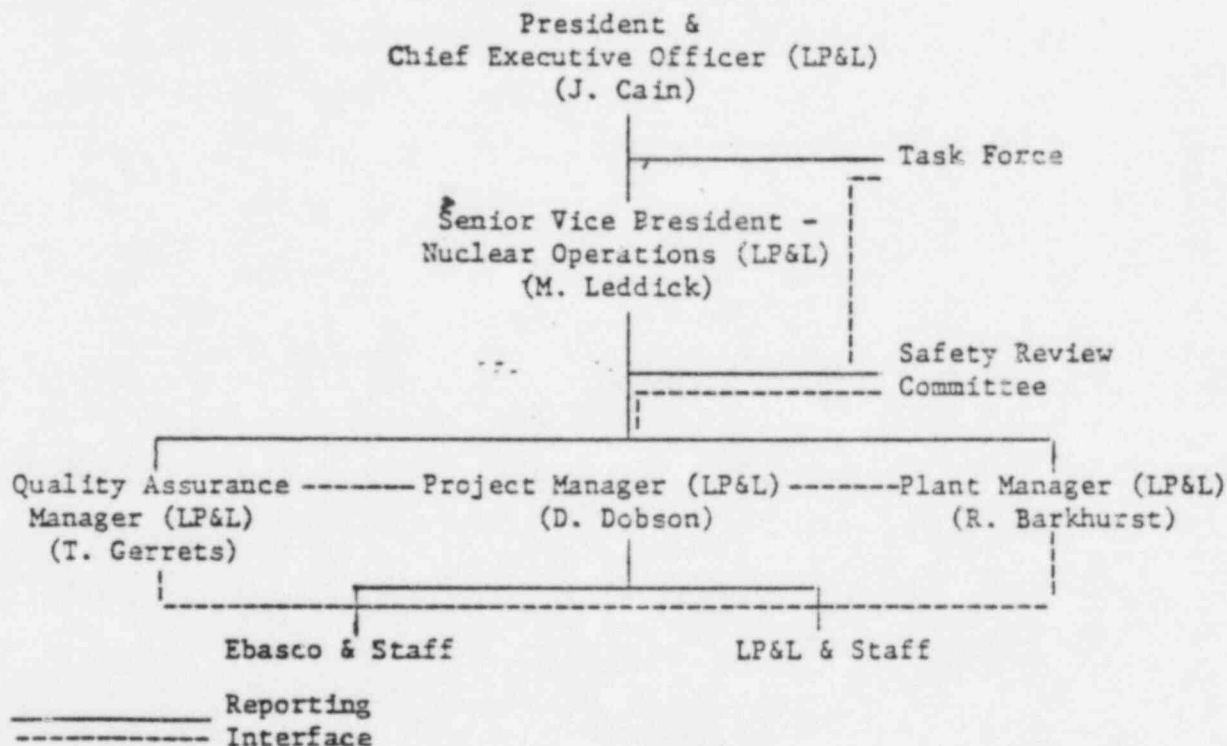
Pursuant to discussions in the referenced meeting, this formalizes agreements reached between us as to the charter of the subject Task Force.

The roles of UNC and NUS will be to act as a task force in providing assessment and advice in responding to the NRC letter of June 13, 1984. It is important to emphasize that both UNC and NUS will maintain sufficient independence in order to provide to me as Chief Executive Officer of LP&L an independent professional assessment regarding the functions listed below. Your assessments will be formalized and sent to the Director of the Office of Nuclear Reactor Operations at the same time they are provided to me.

- The Program Plan and implementation schedule requested in the NRC letter.
- The adequacy of responses and resolutions (including validation of data and sources, as appropriate) of the matters set out in the NRC letter.

- The safety significance of the matters listed in the NRC letter with respect to:
  - Fuel load and testing up to 5% power
  - Operation above 5% power
- The adequacy of the past QA/QC program in light of the matters listed in the NRC letter, and the resolution of such matters.
- Recommend institutional or programmatic changes that are deemed appropriate during plant operation in light of the lessons learned as a result of the matters set forth in the NRC letter, and the LP&L responses hereto.

The following abbreviated organization chart is provided to clearly depict that the Task Force is to have access to and interface with all necessary elements of the Waterford staff but is to report directly to me.



Very truly yours,

*J.M. Cain*  
J.M. Cain

JMC:DED:pb

cc: G. Charnoff, R.S. Leddick, D.E. Dobson

| ISSUE & TITLE                  | DESCRIPTION OF ISSUE  | LP&L APPROACH TO RESOLUTION  | NONE FL TO 5% 5% JUSTIFICATION |
|--------------------------------|---|--|--------------------------------|
| 1. Inspection Personnel Issues | Verify the proper certification of site QA/QC personnel or requalify the work performed by these personnel. | <p>The professional credentials of 100% of the site QA/QC personnel, including supervisors and managers will be verified. Acceptance criteria for certification or qualification of QA/QC personnel will be researched from Contractors' contractual commitments, and QA program requirements.</p> <p>A task force has been established to review the adequacy of credentials to support certifications and qualifications. Acceptance criteria has been established to sort personnel files into 3 groups:</p> <ul style="list-style-type: none"><li>A. Qualifications deemed adequate</li><li>B. Inadequate documentation to perform evaluation</li><li>C. Qualifications questionable.</li></ul> <p>Task team members will then research other site files, contact contractors, and/or initiate background investigations for personnel in groups B and C to verify their acceptability. If they are unable to justify certification of an individual he will be placed in group D (Qualification inadequate). Appropriate site nonconformance documentation will be initiated to document evaluation of safety significance, and corrective actions including re-inspections of work performed as necessary.</p> <p>For QC inspectors remaining on site, a reverification of proper certification has been accomplished in accordance with ANSI-N45.2.6-1973. Quality Control functions currently being undertaken as part of other programs will be performed by personnel reverified as qualified under ANSI-N45.2.6-1973.</p> |                                |

**DRAFT**

JULY 17, 1984

|   |   |  | CURRENT ASSESSMENT OF SAFETY SIGNIFICANCE |          |    |   |
|---|---|--|---|----------|----|---|
| ISSUE & TITLE                               | DESCRIPTION OF ISSUE  | LP&L APPROACH TO RESOLUTION  | NONE                                      | FL TO 5% | 5% | JUSTIFICATION   |
| 2. Missing N1 Instrument Line Documentation | Verify compliance with NRC requirements for N1 instrumentation installations. | LP&L has reviewed all N1 instrumentation installed during the period when class breaks were allowed (prior to April 7, 1982). LP&L has established that documentation exists to verify the adequacy of the B31.1 portions of N1 Instrumentation installations. In some cases, additional inspections were performed. |   |          |    | The combination of the reviews described has provided assurance that documentation is available to assure the quality installation of all N1 instruments. |

The documentation for the ASME portions of the N1 installations were reviewed by the Ebasco Records Review Group prior to the inspection.

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JULY 17, 1984

| ISSUE & TITLE                                      | DESCRIPTION OF ISSUE  | LP&L APPROACH TO RESOLUTION  | NONE FL TO 5% 5% JUSTIFICATION  |
|--|---|--|---|
| 3. Instrumentation<br>Expansion Loop<br>Separation | Correct separation<br>criteria violations<br>found in system 52A and<br>provide a program for<br>review of other safety-<br>related violations and<br>take the necessary<br>corrective actions. | <p>NCR-W3-7702 covers the system 52A problems<br/>and has been dispositioned to remove the<br/>expansion loops in question.</p> <p>NCR-W3-7730 was generated to track the generic<br/>concern. In order to provide some basis for<br/>determining the scope of our program, a sample<br/>of 51 instrument installations were chosen for<br/>review in areas of congestion, and walkdowns of<br/>these lines were done. Thirteen deficiencies were<br/>found out of 276 locations, and were evaluated.<br/>None required rework.</p> <p>A QC verification of all lines where redundant<br/>tubing runs in proximity of each other will be<br/>performed. An interim response discussing the<br/>resolution of NCR-W3-7702 items and the status<br/>of NCR-W3-7730 reinspections will be provided<br/>as well as a schedule for completion of the<br/>reinspections.</p> | <p>The walkdown to date<br/>represents approximate-<br/>ly 20% of the installa-<br/>tions to be walked down.</p> <p>This provides a high<br/>level of confidence<br/>that other design<br/>considerations and<br/>walkdowns (i.e. pipe<br/>rupture/jet impingement<br/>analysis, non-seismic<br/>over seismic criteria<br/>and walkdowns) in<br/>combination with the<br/>tubing separation<br/>criteria has provided<br/>adequate protection<br/>for the instrument<br/>installations.</p> |

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JULY 17, 1984



| ISSUE & TITLE   | DESCRIPTION OF ISSUE  | LP&L APPROACH TO RESOLUTION  | NONE FL TO 5% 5% JUSTIFICATION  |
|---|---|--|---|
| 4. Lower Tier Corrective Actions Are Not Being Upgraded to NCRs | <p>LP&amp;L shall review all FCRs, DCNs, EDNs, and T-B DNs to assure that proper corrective action was taken, including an adequate review by QA. This corrective action shall include the steps required by 10CFR50, Appendix B, Criterion XVI Corrective Action and for Construction Deficiency Reporting, 50.55(e). Also, included in this review shall be the examination of improper voiding of all other design changes or discrepancy notices that affected safety-related systems or that were misclassified as safety.</p> | <p>LP&amp;L has reviewed the lower tier document reporting system and verified it was structured in such a manner that procedures, integral to the Quality Program, provided a sound basis for decisions regarding the severity level of documents used to report deficiencies. The review specifically considered QA and QC reviews of engineering/construction judgements on deficiencies as it relates to the corrective action and nonconformance requirements of 10 CFR 50 Appendix B and the reporting requirements of 10 CFR 50.55(e).</p> <p>The response will include an assessment of all the lower tier documents specifically cited by the NRC to verify the adequacy of the proceduralized safeguards in assuring that deficiencies with safety significance are being properly dispositioned and reported. There will also be an assessment of improper voiding.</p> <p>In addition, a random 2% sample of FCRs, DCNs, EDNs and T-B DNs will be formally reviewed to determine if any should in fact have been reported as NCRs. Any so judged will then be reviewed for reportability under 10CFR450.55e and 10CFR21.</p> | <p>The current review has demonstrated that there has been adequate QA/QC involvement in all lower tier documents with regard to 10CFR50, Appendix B corrective action and non-conformance requirements. This involvement ensures that appropriate corrective actions, specific and generic, are identified</p> <p>Our current evaluation of the examples of lower tier documents cited by the NRC demonstrates that although a small percentage should have been upgraded to NCR's under the quality program in effect, none had adverse safety significance.</p> <p>Thus, LP&amp;L has a high confidence that the sample review will provide additional evidence that the projects' system of "checks &amp; balances" ensures that, despite isolated cases of judgemental or interpretative errors, all lower tier documents, as well as FCRs and DCNs receive adequate evaluation for safety significance.</p> |

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JULY 17, 1984

| ISSUE & TITLE                                  | DESCRIPTION OF ISSUE   | LP&L APPROACH TO RESOLUTION   | NONE FL TO 5% 5% JUSTIFICATION   |
|--|--|---|--|
| 5 Vendor Documentation<br>Conditional Releases | The concern relates to whether shortcomings in contractor's documentation which existed at the time the material was supplied have been corrected. | A problem did exist with formal tracking of Combustion Engineering Conditional Certifications of Equipment. Records associated with CE material and equipment will be re-reviewed and conditional certifications will be identified and promptly resolved. Control of CE material and equipment differs from that of other contractors. In order to verify that a similar problem does not exist in the case of other contractors, a sample audit of other critical purchase orders will be performed. If the sample audit identifies any other problems with the handling of contractor material releases, additional reviews will be initiated. | The CE records and other records with the exception of JA Jones have been reviewed. To date 8 of 14 CE conditional certifications have been changed to unconditional. No items affecting plant safety have been identified in any of the completed reviews and dispositions. |

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JULY 17, 1984

| ISSUE & TITLE  | DESCRIPTION OF ISSUE   | LP&L APPROACH TO RESOLUTION  | NONE FL TO 5% 5% JUSTIFICATION  |
|--|--|--|---|
| 6. Dispositioning of Non-conformance and Discrepancy Reports | Some Ebasco and Mercury NCRs and Ebasco DRs were questionably dispositioned and LP&L shall propose a program to assure all NCRs and DRs are appropriately upgraded, adequately dispositioned and corrective action completed and that any problems detected are corrected. | <p>First, the inplace program for handling of lower tier documents such as DRs will be discussed.</p> <p>Second, the specific NCRs and DRs cited by the NRC will be evaluated for proper designation, disposition, and implementation of corrective action under the existing Quality program.</p> <p>Third, a review of all NCRs was started by LP&amp;L in January to assess the validity of the disposition, the corrective action taken, the completeness of the documentation and proper closure will be discussed.</p> <p>Fourth, a field verification will be conducted on one hundred randomly selected NCRs to ensure the corrective action resolved the nonconformance will be discussed.</p> <p>If any problems are detected from these steps, a plan of further corrective action will be established.</p> | <p>To date, (7/16/83), the NCRs cited by the NRC have been evaluated. Six of the 50 are being further evaluated. Three impact hardware and two software. The balance have been shown to be adequately dispositioned. The overall review of NCRs has been completed with the exception of approximately 31. This review showed 472 of the total 7750 NCRs were questioned. 85% of these deficiencies were documentation which were non significant. The balance will be closed.</p> <p>Among the 100 randomly selected (from the 472) for field verification, all but three have been assembled into packages containing the necessary information for field verification. None of the packages have completed hardware/software verification and documentation evaluation as yet.</p> |

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| ISSUE & TITLE    | DESCRIPTION OF ISSUE   | LP&L APPROACH TO RESOLUTION                                     | NONE FL TO 5% 5% | JUSTIFICATION   |
|------------------|--|---|------------------|---|
| 13. Missing NCRs | LP&L shall obtain the missing NCR's, explain why these NCR's were not maintained in the filing system, review them for proper voiding, and assure that when an issue is raised to an NCR, it is properly filed for tracking and closure. | LP&L has conducted a review for accountability of Ebasco NCR's. |                  | LP&L has reviewed for accountability all closed or voided Ebasco Site and New York Office issued NCRs. The review concludes that all are accounted for. Those not maintained on file in the vault were either voided or never issued.<br><br>In summary, sufficient documentation exists to account for all closed and voided NCRs. |

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JULY 17, 1984

| ISSUE & TITLE  | DESCRIPTION OF ISSUE   | LP&L APPROACH TO RESOLUTION   | NONE | FL TO 5% | 5% | JUSTIFICATION   |
|--|--|---|------|----------|----|---|
| 22. Welder Qualification (Mercury) and Filler Material Control (Site Wide) | <p>Verify welder qualifications or assure the quality of all welds.</p> <p>Provide engineering justification for the allowance of "rebake" temperatures and holding times that differ from the requirements of the ASME and AWS Codes.</p> | <p>The missing welder documentation is available which demonstrates that the welders were properly qualified.</p> <p>Baking/rebaking is not allowed on the site. Site procedures for receiving, storage, issuing and control of filler material meets the required codes.</p> |      |          |    | <p>All welders were found to be properly qualified. NCR-W3-7724 addressed and resolved qualifications sheet errors for 3 welders (clerical errors which were committed after the welders left site).</p> <p>No code deviations exist.</p> |

# DRAFT

JULY 17, 1984

## PROGRAM PLAN

## CURRENT ASSESSMENT OF SAFETY SIGNIFICANCE

| ISSUE & TITLE  | DESCRIPTION OF ISSUE  | LP&L APPROACH TO RESOLUTION   | CURRENT ASSESSMENT OF SAFETY SIGNIFICANCE |          |    | JUSTIFICATION  |
|--|---|---|---|----------|----|--|
|  |   |   | NONE                                      | FL TO 5% | 5% |  |
| 23. QA Program Breakdown between Ebasco and Mercury. | Provide an assessment of the overall QA program and determine the cause of the breakdown in the case of Mercury, together with the corrective action to prevent recurrence. | <p>LP&amp;L and Ebasco recognize that certain aspects of the respective QA programs were not fully effective. Evaluations are underway in these areas to establish cause and corrective action. Lessons learned from the evaluation will be applied to other aspects of the respective programs.</p> <p>LP&amp;L will review all of the above in light of the entire QA program and make an overall assessment of its adequacy.</p> |   |          |    | To date the specific issues involve inadequate or inconsistent closure documentation, and not hardware impacting concerns. The review indicates that there are no open items affecting plant safety. |

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JULY 17, 1984

July 17, 1984

T.B./Mercury

J.B. No high school diploma / No experience → rose to level 3 in Mercury - hybrid 73 : 78 procedures to qualify inspectors

LP's worries about a prof liar  
Contractor ya.

J.B. doesn't verify resumes, not their policy.

LP's are now doing 100%

Mercury → had answers to test (ANSI) before tested

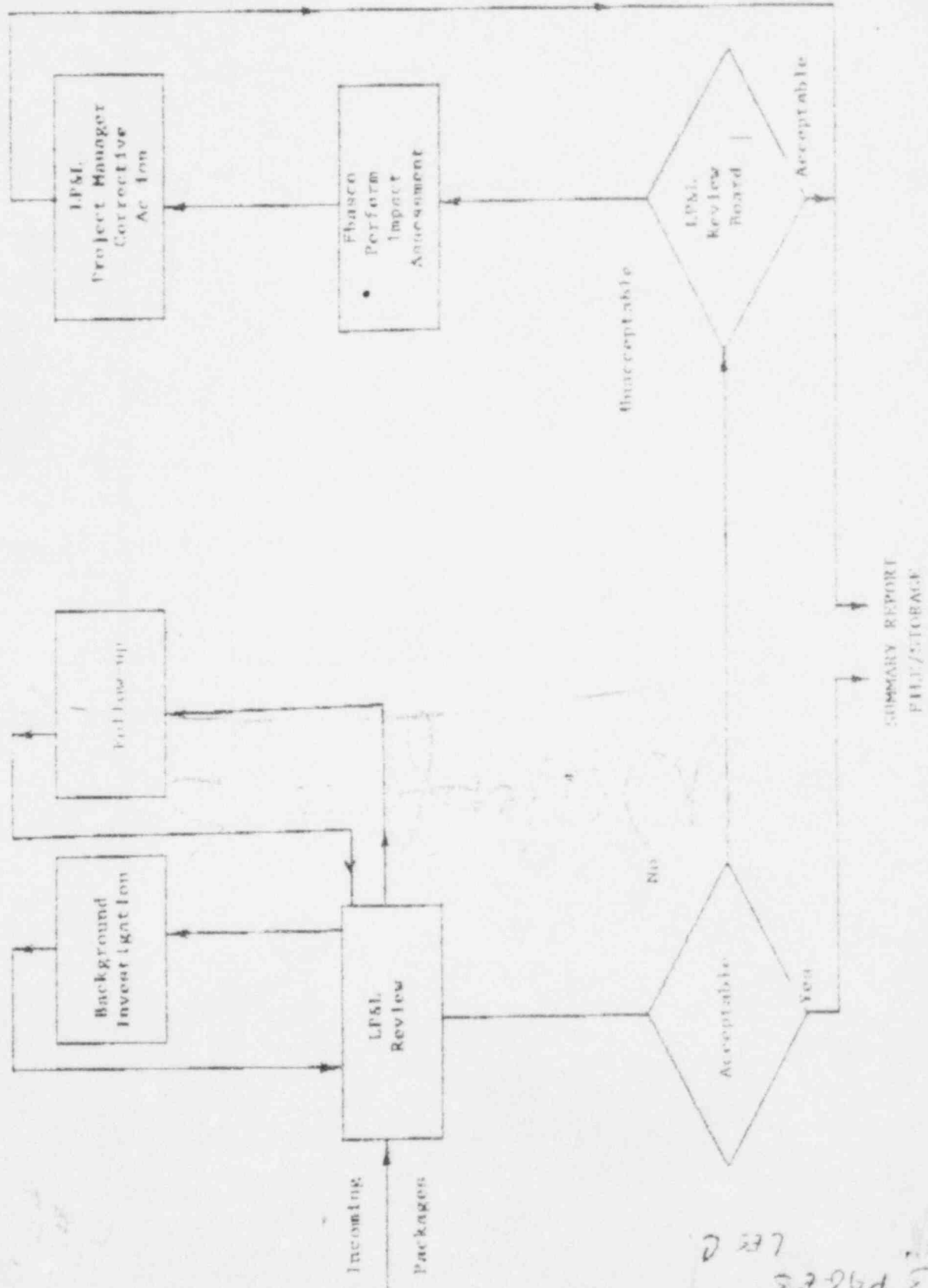
at Byron it took 1 year (6 months for paper chase) then reinspect started.  
George Marcus

Mercury NCRs loaded



We might need a meeting to discuss upgrading of FCRs, etc.,  
to NCRs — sometimes judgement call

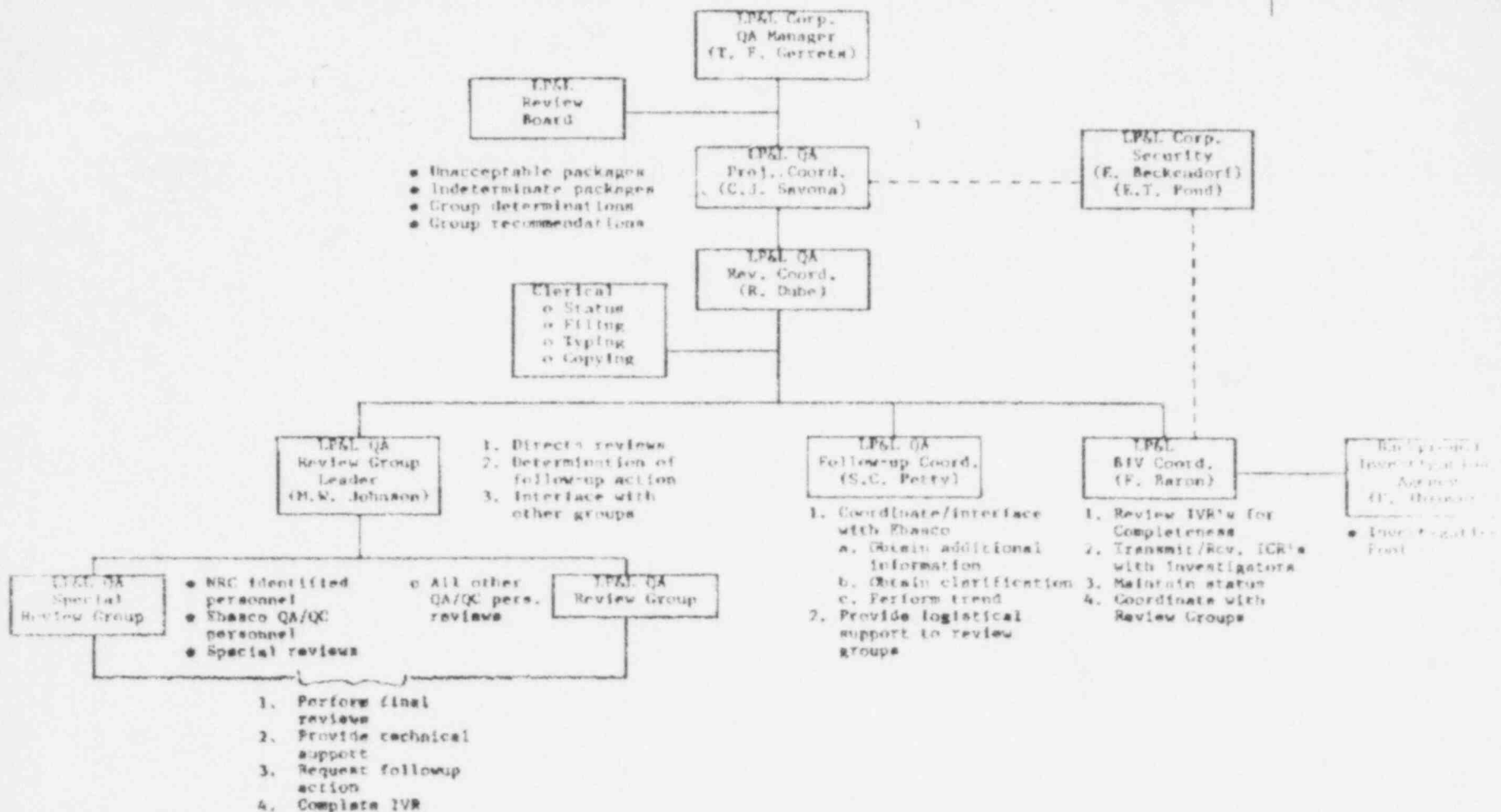
EDNs & ENs did not receive review for upgrading



10 D GRATCHFIELD  
3 PAGES  
LEE C



LP&L ORGANIZATION  
CONTRACTOR QA/QC VERIFICATION PROJECT



# QA/QC QUALIFICATIONS STATUS

CONF 5/9/64

| OPERATOR            | A   | B   | C  | D | TOTAL | IN-SERVICE<br>SCORE | REWORK |    |    |   | REMARKS                           |
|---------------------|-----|-----|----|---|-------|---------------------|--------|----|----|---|-----------------------------------|
|                     |     |     |    |   |       |                     | A      | B  | C  | D |                                   |
| ADRIAN ROSE         | 13  | 1   |    |   | 14    | 14                  | 14     | 14 | 14 | 8 |                                   |
| DAN THISTLETON      | 14  | 11  | 14 |   | 39    | 39                  |        |    |    |   |                                   |
| CRIST               | 28  | 8   |    |   | 36    | 36                  |        |    |    |   | one out not for                   |
| OPERATING INSPECTOR | 33  | 6   |    |   | 40    | 40                  |        |    |    |   |                                   |
| ELTON               | 2   | 13  | 3  |   | 18    | 18                  |        |    |    |   |                                   |
| CHUBBY W. BUCK      | 81  | 5   | 2  |   | 88    | 88                  |        |    |    |   | 11 out not for                    |
| GEORGE              | 21  | 66  | 51 | 2 | 140   | 140                 |        |    |    |   | 5 - 40 out not for<br>10 - 40 out |
| JOE CRON            | 20  | 95  |    |   | 115   | 115                 |        |    |    |   |                                   |
| JOE LUTHER          | 25  |     |    |   | 25    | 25                  |        |    |    |   | 4 out not for                     |
| J. A. DAVIS         | 7   | 53  | 16 |   | 76    | 76                  |        |    |    |   | 4 out not for                     |
| NEEDLE              | 75  | 51  | 55 | 6 | 187   | 187                 |        |    |    |   | 1 - 40 out not for                |
| ALTON               | 1   | 26  | 1  |   | 28    | 28                  |        |    |    |   | one out not for                   |
| ROGER               |     |     |    |   |       |                     |        |    |    |   |                                   |
| STUB                | 38  | 4   | 19 |   | 61    | 61                  |        |    |    |   |                                   |
| THOMAS-MOORE        | 97  | 3   | 20 |   | 120   | 120                 |        |    |    |   | one out not for                   |
| WALTON              | 30  | 7   | 1  |   | 38    | 38                  |        |    |    |   |                                   |
| SHANE               | 273 | 277 | 12 |   | 562   | 562                 |        |    |    |   | 13 out not for                    |
| THOMAS MOORE        | 21  |     |    |   | 21    | 21                  |        |    |    |   |                                   |
|                     |     |     |    |   | 715   | 715                 |        |    |    |   |                                   |