



ENTERGY

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Director

Nuclear Safety

Waterford 3

W3F1-94-0047

A4.05

PR

May 11, 1994

U.S. Nuclear Regulatory Commission

ATTN: Document Control Desk

Washington, D.C. 20555

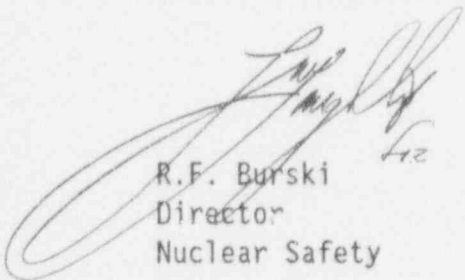
Subject: Waterford 3 SES
Docket No. 50-382
License No. NPF-38
NRC Inspection Report 94-05
Reply to Notice of Violation

Gentlemen:

In accordance with 10CFR2.201, Entergy Operations, Inc. hereby submits in Attachment 1, the response to the violation identified in Appendix A of the subject Inspection Report.

If you have any questions concerning these responses, please contact C.J. Thomas at (504) 739-6531.

Very truly yours,



R.F. Burski
Director
Nuclear Safety

RFB/CJT/tjs
Attachment

cc: L.J. Callan (NRC Region IV), D.L. Wigginton (NRC-NRR),
R.B. McGehee, N.S. Reynolds,
NRC Resident Inspectors Office (WADM526)

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ATTACHMENT 1

ENTERGY OPERATIONS, INC. RESPONSE TO THE VIOLATION IDENTIFIED IN
APPENDIX A OF INSPECTION REPORT 94-05

VIOLATION NO. 94-05-01

Criterion V of Appendix B to 10 CFR Part 50 requires that activities affecting quality be prescribed by documented instructions or procedures of a type appropriate to the circumstances and that the instructions or procedures include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Administrative Procedure HP-001-114, Revision 4, "Installation of Temporary Lead Shielding," provided instructions for the installation of temporary shielding.

Contrary to the above, on January 26, 1994, Procedure HP-001-114 was not appropriate in that the procedure did not include adequate acceptance criteria. As a result, temporary lead shielding structures were found to be contacting safety-related pipe support electrical conduit and a safety-related snubber.

RESPONSE

(1) Reason for the Violation

Entergy Operations, Inc. admits this violation and believes that the root cause was an inadequate procedure in that Revision 4 of HP-001-114 did not include adequate acceptance criteria. Revision 4 of the procedure required caution when placing temporary shielding to assure that snubber operation, valve operation, equipment access or equipment operability is not interfered with. However, the procedure did not specifically require that adequate separation be maintained between shielding and safety-related equipment. Additionally, the procedure did not require examinations of installed shielding to identify and eliminate interference or contact with plant equipment or structures.

The temporary shielding structures consisted of scaffold frames supporting lead sheets with grommets. The lead sheets were manufactured by DA Flex and designed to hang from scaffold frames by 'S' shaped hooks. Additionally, Number 9 wire and Ty-raps were used to secure the sheets to prevent interference with plant equipment or structures. It should be noted that this was the first time that DA Flex lead sheets were used at Waterford 3.

During construction of the temporary shielding structures, the NRC inspectors noted two conditions where lead sheets were contacting safety-related equipment. A lead sheet near Component Cooling Water (CCW) Return Header Containment Isolation Valve CC-713 was contacting the electrical conduit for the valve's solenoid. Also noted was a lead sheet contacting High Pressure Safety Injection Line Snubber SIRR-1055. In both cases, adequate separation was not maintained between lead sheets and safety-related equipment. If Revision 4 of HP-001-114 had incorporated adequate acceptance criteria, then those conditions may have been prevented.

(2) Corrective Steps That Have Been Taken and the Results Achieved

Personnel from Design Engineering and Radiation Protection (RP) inspected the temporary shielding structures on January 26, 1994. In addition to the conditions identified by the NRC inspectors, two lead sheets were identified within 1 inch of electrical conduit 30715K-SA. Also, those personnel involved with the shielding installation were informed of the discrepant conditions and of the precautions that need to be taken when installing shielding near safety-related equipment. These actions were completed on the same day the NRC inspectors communicated the event to Waterford 3 personnel.

On January 27, 1994, the discrepant lead sheets were repositioned and secured such that adequate separation was maintained between the sheets and safety-related equipment. Condition Report (CR) 94-067 was written to determine the root cause and necessary corrective actions. As part of the corrective actions for that CR, Design Engineering performed a seismic evaluation to determine if the lead sheets affected the seismic integrity of the safety-related components. The evaluation concluded that the conditions would not have prevented the safety-related equipment from performing its safety function.

(3) Corrective Steps Which Will Be Taken to Avoid Further Violations

Discussions were held with RP personnel to accentuate this event and the need to maintain adequate separation between shielding and safety-related equipment. Additionally, RP personnel were required to review CR 94-067. The discussions and review were completed by March 29, 1994.

Revision 5 to HP-001-114 was implemented on March 31, 1994. Revision 5 incorporates four enhancements that were lacking in Revision 4. First, Revision 5 specifically addresses the installation of DA Flex lead shielding. Second, Revision 5 requires that temporary shielding be maintained 1 inch or greater from safety-related equipment. If 1 inch or greater cannot be maintained, an approved Engineering Evaluation is required. Third, Revision 5 requires that temporary shielding be secured in cases where shielding installations are delayed for extended periods. Finally, the acceptance criteria were expanded to require that the ALARA Coordinator/Designee perform an inspection of completed shielding installations. The inspection is conducted to ensure that shielding is secure and maintained 1 inch or greater from safety-related equipment. If an exception to that distance is identified, then the ALARA Coordinator/Designee must verify that an approved Engineering Evaluation has been completed.

(4) Date When Full Compliance Will Be Achieved

Full compliance was achieved on March 31, 1994.