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Waterford 3

W3F1-93-0130
A4.05
PR

April 16, 1993

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 92-27
Supplemental Information

Gentlemen:

Based on conversations between members of the Waterford 3 staff and the NRC, Entergy Operations is submitting this letter to provide supplemental information regarding our response to NRC Inspection Report 50-382/92-27.

Your inspection report indicated your concern that both of the examples cited in violation 9227-01 indicated a weakness in the Waterford 3 Corrective Action Program because each resulted from inadequate corrective action in response to earlier violations.

Upon receipt of Inspection Report 92-27, Entergy Operations performed a review (summarized below) of each of the examples cited in the attached Notice of Violation. We agree that, on the surface, the two examples referred to in violation 9227-01 appear to be similar to the events cited in violations 8941-02 and 9201-01. Despite the apparent similarity, however, our review indicated that the examples cited in the most recent violation were not the result of inadequate corrective action. On the contrary, our review indicates that the corrective actions specified for the earlier violations were appropriate and should have prevented recurrence. It is our view that the two examples discussed in violation 9227-01 resulted, not from a failure to identify the appropriate corrective

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action, but rather from a weakness in the implementation of that corrective action. Accordingly, we believe that the examples specified in violation 9227-01 are not indicative of a programmatic weakness in the Waterford 3 Corrective Action Program.

With regard to the first example, regarding the Independent Verification Program, we believe that the corrective action specified for violation 8941-02 was appropriate to address the root cause of that event- confusion on the departmental level over the definition of independent verification and when it is required. The problem identified in example A of violation 9227-01 did not result from any shortcomings in the corrective action specified for violation 8941-02. Rather, the implementation of the corrective action for the earlier violation created a different problem when a procedural requirement was inadvertently deleted. In short, absent the new problem that was created during the implementation process, we believe that the corrective action for violation 8941-02 was appropriate to address the root cause of the first event. Additional detail is provided in Attachment 1 to our response to example A of violation 9227-01 (Waterford 3 letter W3F193-0123 dated March 3, 1993).

In the second example, involving the Waterford 3 temporary alteration (TAR) process, our review indicates that the corrective action specified in the response to violation 9201-01 was adequate to correct the deficiency identified in that violation. As stated in our response, the specified corrective action was not fully effective, largely because of personnel errors that were made shortly after the specified corrective action was put in place. Here again, more effective implementation of the corrective action for violation 9201-01 might have prevented some of the personnel errors that occurred. Additional detail is provided in our response to example B to violation 9227-01.

In summary, Entergy Operations recognizes that an effective corrective action program is a fundamental prerequisite to the success of Waterford 3. As such, the corrective actions for the previous events were a major consideration in our review of each of the examples cited in violation 9227-01; as previously stated, we believe that they are not indicative of a weakness in the corrective action program.

NRC Inspection Report 92-27

Supplemental Information

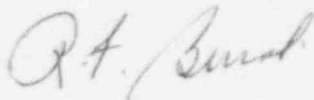
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If you have any questions concerning this response, please contact
T.W. Gates at (504) 739-6697.

Very truly yours,



R.F. Burski
Director
Nuclear Safety

RFB/TWG/ssf
Attachment

cc: J.L. Milhoan, NRC Region IV
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