



ENTERGY

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Nuclear Safety

Waterford 3

W3F1-91-0056

A4.05

QA

April 19, 1991

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 91-04
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 this response, please contact B.R. Loetzerich at (504) 739-6636.

Very truly yours,

RFB/BRL/ssf

Attachment

cc: Messrs. R.D. Martin, NRC Region IV
D.L. Wigginton, NRC-NRR
E.L. Blake
R.B. McGehee
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ATTACHMENT 1

ENTERGY OPERATIONS, INC. RESPONSE TO THE NOTICE OF VIOLATION
IDENTIFIED IN APPENDIX A OF INSPECTION REPORT 91-04

Violation No. 9104-01

Failure to Provide Supervisory Training to some Contract Supervisors who fall
within the Scope of Part 26

10 CFR 26.22(c) requires, in part, that initial training must be completed prior to assignment of duties within the scope of Part 26. Additionally, 10 CFR 26.23, requires, in part, that all contractor and vendor personnel performing activities within the scope of Part 26 be subject to the licensee's program if they are not in another approved fitness-for-duty program.

Contrary to the above, during 1990 and January 1991, the licensee failed to provide initial supervisory training to some contractor supervisors assigned duties that fell within the scope of this part.

This is a Severity Level IV violation (Supplement VII).

Response

(1) Reason for the Violation

Entergy Operations, Inc. admits the violation and believes the root cause was inadequate controls to ensure that contractor and vendor personnel identified as having supervisory responsibilities within the scope of 10 CFR 26, received Fitness-for-Duty (FFD) supervisory training prior to assuming duties within the scope of Part 26.

W3 currently provides FFD training for three aspects associated with the requirements of 10 CFR 26: awareness, escort and supervisory training. General Employee Training (GET) 1 includes FFD awareness and escort training as defined in 10 CFR 26.21 and 26.22 (b), respectively, and is provided to personnel as a prerequisite to obtaining unescorted access. W3 also provides FFD Management/Supervisory Training to meet the requirements of 10 CFR 26.22 (a), for personnel identified as performing supervisory duties within the scope of Part 26.

Authorized personnel complete an Area Access Request (AAR) form as part of the processing for individuals requesting unescorted access. The form contains a specific section which is completed to identify those contract and vendor personnel which are designated as supervisors. The personnel specified as supervisors on the AAR form were required to have previously completed FFD supervisory training, or were scheduled to complete the training within 3 months. Therefore, the existing process allowed contractor and vendor personnel designated as supervisors to be scheduled for FFD supervisory training without completing the training prior to receiving unescorted access.

In summary, the FFD supervisory training was provided for contractor and vendor personnel, but was not controlled as a pre-requisite to being granted unescorted access.

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

A review was conducted of AAR forms on file for contract and vendor personnel to identify individuals which were designated as having supervisory responsibilities prior to being granted unescorted access. In addition, training records were reviewed to identify the status of FFD supervisory training for those specific individuals. These reviews were completed on April 5, 1991 and revealed that all contract and vendor personnel identified on the AAR forms as having supervisory responsibilities within the scope of Part 26 have successfully completed FFD supervisory training.

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

The procedure which controls the personnel screening process for unescorted access, PS-11 101, will be revised to ensure that unescorted access shall not be granted to personnel identified as supervisors assuming duties within the scope of Part 26, prior to completion of FFD supervisory training.

In addition, a new FFD site directive which will replace the current Nuclear Operating Procedure NOP-21, "Fitness-for-Duty", will incorporate the identification of individuals requiring FFD supervisory training as it relates to unescorted access. The site directive will state that personnel identified or hired as a supervisor must receive FFD supervisory training as a prerequisite of being granted unescorted access. The site directive will also state that personnel already granted unescorted access and promoted to supervisory status must complete FFD Management/Supervisory training within three months of initial supervisory assignment.

(4) Date When Full Compliance Will be Achieved

The procedure revision, in accordance with the new FFD site directive, will be completed by May 31, 1991 at which time Entergy Operations, Inc. will be in full compliance.