



**ENTERGY**

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**R. F. Burski**

Director,  
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Waterford 3

W3F1-95-0009

A4.05

PR

February 1, 1995

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 94-26  
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.

Should you have any questions concerning this response, please contact R.T. Kullmann at (504) 739-6494.

Very truly yours,

R.F. Burski  
Director  
Nuclear Safety

RFB/RTK/tjs  
Attachment

cc: L.J. Callan (NRC Region IV), C.P. Patel (NRC-NRR),  
R.B. McGehee, N.S. Reynolds, NRC Resident Inspectors Office

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ATTACHMENT 1

ENTERGY OPERATIONS, INC. RESPONSE TO THE VIOLATION IDENTIFIED IN  
APPENDIX A OF INSPECTION REPORT 94-26

VIOLATION NO. 9426-01

During an NRC inspection conducted on November 14 through December 2, 1994, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

Technical Specification 6.8.1.a requires, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Appendix A, states, in part, that activities that can affect the performance of safety-related equipment should be performed in accordance with written procedures appropriate to the circumstances.

Procedure UNT-007-014, "Administrative Procedure Setpoint Change Control", Revision 6, states, in part, that "[t]he responsible engineer shall . . . initiate . . . Station Information Management System (SIMS) data base updates."

Contrary to the above, on July 23, 1994, the licensee failed to initiate an update of the Station Information Management System after completion of Work Authorization 01125613 to change the temperature controller setpoints for the Boric Acid Makeup Tanks.

This is a Severity Level IV violation (Supplement I)  
(Violation 382/9426-01)

RESPONSE

(1) Reason for the Violation

Entergy Operations Inc. admits this violation and believes that the root cause of this event was personnel error in that the responsible engineer only posted SIMS updates for two components when four components were actually affected.

Waterford 3 had performed a calculation to assess the adequacy of available net positive suction head for the charging pumps when taking suction from the Boric Acid Makeup (BAM) Tanks in the gravity feed mode. As a result of this calculation it was determined that the temperature being maintained in the Boric Acid Makeup Tanks would have to be lowered so that adequate net positive suction head would be available for the situation where three charging pumps are running in the gravity feed mode. Setpoint Change 93-011 was initiated to lower the temperature setpoint of the Boric Acid Makeup Tanks. This setpoint change affected four temperature indicator controllers (BAMITIC0206, BAMITIC0207, BAMITIC0208, BAMITIC0209). These temperature controllers are not quality or safety related components.

Administrative procedure UNT-007-014 Revision 6 "Setpoint Change Control" states in part "The responsible engineer shall . . . initiate . . . SIMS data base updates". However, the responsible engineer only posted the setpoint changes in the SIMS data base for two of the affected temperature controllers (BAMITIC0207, BAMITIC0209)

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

Immediately following the identification of this event, a Condition Report (CR-94-1139) was generated in accordance with Waterford 3 Administrative Procedure UNT-006-011 "Condition Report" to provide a means to implement the Waterford 3 Corrective Action Program. The setpoint changes were posted in the SIMS data base against the two components (BAMITIC0206, BAMITIC0208) which had previously been missed. The responsible engineer was verbally counseled on the importance of maintaining the accuracy of information in the SIMS data base. It is important to note that prior to this event, a revision to UNT-007-014 Revision 6 "Administrative Procedure Setpoint Change Control" was being developed to incorporate several improvements. These improvements provide guidance to ensure that the SIMS data base is updated as required. Steps were added to this procedure which require Setpoint Screen Update Forms to be utilized when the SIMS data base is to be updated. These additional steps also describe the method by which Design Engineering's processing of these forms will be performed. Revision 7 of UNT-007-014 was reviewed and approved for use with an effective date of December 1, 1994.

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

Two additional corrective actions will be taken to avoid further violations of this type in the future. First, Nuclear Operations Engineering and Construction Procedure NOECP-317 "Setpoint Changes"

Revision 0 will be revised to provide a precise sequence of steps to be followed when processing setpoint changes that will affect the SIMS data base. Secondly, the Quality Assurance department will perform an assessment of the SIMS setpoint data base. This assessment will consist of obtaining a random sample of SIMS setpoint data and comparing this data against the calibration data sheets that are used in the plant. The results of this assessment will be provided to Design Engineering for analysis.

(4) Date When Full Compliance Will Be Achieved

Waterford 3 will be in full compliance when the Quality Assurance assessment and the revision to Nuclear Operations Engineering and Construction Procedure NOECP-317 "Setpoint Changes" mentioned above are complete. The scheduled completion date of these items is April 30, 1995.