



**ENTERGY**

Entergy Operations, Inc.  
P.O. Box B  
Kilgus, LA 70066  
Tel 504 739 6774

**R. F. Burski**  
Director  
Nuclear Safety  
Waterford 3

W3F1-95-0072  
A4.05  
PR

**May 11, 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 95-03  
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 W.H. Pendergrass at (504) 739-6254.

Very truly yours,

R.F. Burski  
Director  
Nuclear Safety

RFB/WHP/tjs  
Attachment

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

9505150222 950511  
PDR ADOCK 05000382  
Q PDR

ATTACHMENT 1

ENTERGY OPERATIONS, INC. RESPONSE TO THE VIOLATION IDENTIFIED IN  
APPENDIX A OF INSPECTION REPORT 95-03

VIOLATION NO. 9503-02

During an NRC inspection conducted on February 5 through March 18, 1995, 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:

- A. Technical Specification 6.8.1.a requires, in part, that written procedures be established, implemented, and maintained covering the activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, Appendix A, "Quality Assurance Program Requirements," Section 3.s.2.a requires the licensee to develop procedures for the emergency diesel generator.

Contrary to the above, the licensee's Operating Procedure OP-600-007, "Annunciator Response - Diesel Generator A or B Local Panel," Attachment 4.7, "Engine Overspeed," and Attachment 4.9, "Generator Differential," and Operating Procedure OP-009-002, "Emergency Diesel Generator," related to operation of the emergency diesel generator did not specify how to reset the emergency diesel generator following a trip during a safety injection actuation signal.

This is a Severity Level IV violation.(VIO 382/9503-02)

RESPONSE

(1) Reason for the Violation

Entergy Operations Inc. admits this violation but has determined that the problem identified by the violation was not due to a procedural deficiency. The root cause of this violation is believed to be an operator knowledge weakness due to a deficiency in maintaining Nuclear Auxiliary Operator (NAO) proficiency in resetting Emergency Diesel Generator trips. It was believed that the task of resetting the Emergency Diesel Generator could be accomplished using "toolbox" or "skill-of-the-trade" knowledge. While this is probably true in the case of licensed personnel, who undergo rigorous Job Performance Measure (JPM) based qualification and refresher training,

it has not been the case for Nuclear Auxiliary Operators (NAO's). Operations Training department personnel had identified the need for a more consistent method for NAO's to demonstrate their ability to perform vital tasks

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

When it was understood that a deficiency existed, a Condition Report (CR 95-225) was written to enter the event into the corrective action program, and the Operations Superintendent issued a Daily Instruction requiring NAO's to discuss Emergency Diesel Generator (EDG) reset processes with their individual supervisors during field walkdowns.

Additionally, Operations Training began additional field walkdowns with NAO's to ensure a complete understanding of the EDG resetting process. This was completed by 4/18/95.

For procedural enhancement, operations personnel implemented a change to OP-600-007, "Annunciator Response - Diesel Generator A or B Local Panel." This procedure change provided specific guidance for the resetting of the EDG. Additionally, controlled copies of these response procedures were placed in each EDG room to allow for easy operator reference. This was completed on 4/15/95.

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

The initial NAO training provides NAO's with sufficient knowledge to perform desired EDG evolution's. Over time, these abilities may degrade in some cases. Operations Training is in the process of performing a detailed review of Nuclear Auxiliary Operator training for Emergency Diesel Generator tasks, per training request TR-95-050, and will determine if enhancements are desirable. This review will cover content of lesson plans, frequency of refresher training, walkdown guides, and qualification cards as applicable. These reviews, in addition to the actions undertaken by Operations will ensure that appropriate attention is applied to the issue of classroom and on-shift training and knowledge retention.

In order to determine if other operator knowledge concerns need to be addressed, Operations will review the effectiveness of the NAO Observation Program, and implement improvements if needed.

Additionally, Operations Training will provide EDG refresher training to Nuclear Auxiliary Operators.

A combined effort will be made by Operations and Operations Training to review classroom and on-shift NAO training philosophies and practices, and make improvement recommendations, as necessary.

Operations department personnel will review existing guidance to determine whether procedures are properly checked for level of detail during technical reviews.

(4) Date When Full Compliance Will Be Achieved

Based on the completed immediate corrective measures Waterford is in full compliance. Although not part of the specific corrective actions for this violation, the additional conservative measures listed in Item (3) above are scheduled to be completed by 12/15/95.