



ENTERGY

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Director
Nuclear Safety
Waterford 3

W3F1-95-0118

A4.05

PR

August 9, 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 95-05
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 this response, please contact Greg Scott at (504) 739-6703.

Very truly yours,

R.F. Burski
Director
Nuclear Safety

RFB/GCS/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 95-05

VIOLATION NO. 9505-02

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 9.a, requires that the licensee personnel follow maintenance procedures for safety-related equipment. Procedure UNT-005-007, Revision 4, "Plant Lubrication Program," Attachment 6.2, "Lubrication Checklist," Step 3.7, requires that pump couplings be lubricated in accordance with the applicable vendor technical manual. Vendor Technical Manual 457000074 "Kopflex Coupling" page 4, Table, "Model B," requires adding 8 ounces of grease to the coupling.

Contrary to the above, on May 23, 1995, the inspector determined that mechanics failed to sufficiently lubricate the motor-to-pump coupling on Containment Spray Pump B. Specifically, maintenance personnel added two ounces of grease.

RESPONSE

(1) Reason for the Violation

Entergy Operations, admits this violation and believes that the root cause was inadequate instructions for performing the task of lubricating the containment spray coupling in that procedure UNT-005-007, "Plant Lubrication Program", technical manual 457000074, "Instruction Manual for Containment Spray Pumps and Motors" and Work Authorization WA 01135201 were not clear enough to properly direct maintenance personnel. Specifically, procedure UNT-005-007 did not give instructions on lubricating the type of coupling that does not have two port configuration such as the Containment Spray Pump B (CSP B). In addition, technical manual 457000074 was not clear as to the proper amount of lubricant to put in the CSP B coupling. Also, Work Authorization 01135201 instruction sequence was not in correct order to adequately perform this task.

Contributing to this event was personnel error in that guidance provided by maintenance engineering to maintenance personnel as to the amount of lubrication to put in the coupling was incorrect. However maintenance engineering personnel subsequently determined,

through conversation with the CSP vendor, the correct amount of lubrication to put in the CSP B coupling.

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

The correct amount of lubricant, as determined per conversation with the Containment Spray Pump coupling manufacturer, was added to the coupling. This was done on May 24, 1995, one day after the initial discovery of the lubrication error.

A review of all the safety related pump motor couplings' lubrication was performed. The review determined that these couplings were all lubricated 1/3 to 1/2 full, which is an acceptable industry standard.

A meeting was conducted with Plant Mechanical Maintenance (PMM) personnel to clarify procedure UNT-005-007 as it relates to lubricating the containment spray and other similar pump couplings.

Appropriate Maintenance Engineering and PMM personnel were counseled per Waterford 3's Improving Human Performance Program.

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

Procedure UNT-005-007, Plant Lubrication Program, will be revised to include specific instructions for lubricating the containment spray and other similar pump couplings.

Instructions in Technical Manual 457000074 will be appended to state that 1/3 to 1/2 volume of lubricant in containment spray and other similar coupling is acceptable.

Steps in the task work instruction will be reordered for clarification to require lubrication of coupling prior to reassembly.

(4) Date When Full Compliance Will Be Achieved

Full compliance will be achieved by December 31, 1995.