



ENTERGY

Entergy Operations, Inc.

R. F. Burski

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W3F1-96-0011

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February 21, 1996

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 95-10
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 Enclosure 1 of the subject Inspection Report.

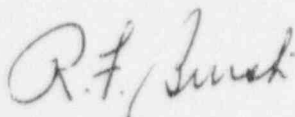
The violation described in Inspection Report 95-10 involves a Standing Instruction that was implemented which was in conflict with the applicable Technical Specification. Standing Instructions at Waterford 3 are instructions that are interim in nature and may allow operational information to be expeditiously communicated to on-shift Operations Personnel. These instructions may contain limitations which are administratively imposed but should not conflict with previously approved procedures, Technical Specifications, or the plant Operating License. In the cover letter to Inspection Report 95-10 it is stated that the violation is of concern because plant personnel failed to consider the impact the ultimate heat sink operability evaluation, completed by engineering, had on Technical Specification requirements for operation of the dry cooling tower fans and that its implementation could have resulted in a violation of the Technical Specifications. Waterford 3 also shares this concern in that this event clearly did not meet plant management expectations.

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Although the discovery of the deficiency between the design basis and the ultimate heat sink Technical Specification was prompt, the resulting evaluation and Standing Instruction were clearly deficient in their consideration of the current licensing basis. With the implementation of a Standing Instruction which was in conflict with the applicable Technical Specification, licensed Operators were placed in a position where their training, knowledge, and use of the Technical Specifications could have been challenged to prevent violation of the Operating License. The NRC Inspector's prompt and thorough review of this issue resulted in the resolution of this discrepancy.

If 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

ATTACHMENT 1

ENTERGY OPERATIONS, INC. RESPONSE TO THE VIOLATION IDENTIFIED IN
ENCLOSURE 1 OF INSPECTION REPORT 95-10

VIOLATION NO. 9510-01

During an NRC inspection conducted from November 12 through December 30, 1995, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," (60 FR 34381; June 30, 1995), the violation is listed below:

10 CFR Part 50, Appendix B, Criterion III states, in part, that measures shall be established to assure that applicable regulatory requirements are correctly translated into instructions.

Waterford 3, License NPF-38, Condition C.2 requires, in part, that Entergy Operations, Inc., shall operate the facility in accordance with the Technical Specifications.

Technical Specification 3.7.4.c refers to Table 3.7-3, "Ultimate Heat Sink Minimum Fan Requirements," that lists the number of fans required under different ambient meteorological conditions. Specifically, Table 3.7-3 allows up to three dry cooling tower fans to be inoperable at less than 90 degrees F dry bulb temperature and with a wet bulb temperature less than 81 degrees F.

Contrary to the above, on November 30, 1995, the licensee issued Operations Standing Instruction 95-13 that would have allowed continued plant operation with up to three dry cooling tower fans inoperable at an ambient dry bulb temperature less than or equal to 92.8 degrees F.

This is a Severity Level IV violation (Supplement I) (382/9510-01).

RESPONSE

(1) Reason for the Violation

Entergy Operations Inc. admits this violation and believes the apparent cause of this event was personnel error. Input for preparation of Standing Instruction 95-13 was provided by the Design Engineering Department. The Design Engineer prepared the input from a nuclear safety standpoint only

and did not review all regulatory requirements to ensure the input to the Standing Instruction complied with the Operating License. In addition, Operations Management implemented the Standing Instruction in the Control Room in accordance with Operations Department Procedure OI-016-000, "Daily Instructions and Standing Instructions", without ensuring that the information provided by Design Engineering was accurate and verifying that the Standing Instruction would not be in conflict with the applicable Technical Specifications. Operations Management had been informed that the Technical Specifications were no longer conservative enough and that the additional requirements were more conservative than the Technical Specifications. Based on that information, Operations Management implemented the new requirements.

One contributing cause of this violation is that Operations Department Procedure OI-016-000 is somewhat vague about the types of information that should be administratively controlled by a Standing Instruction.

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

A Condition Report (CR-96-0019) 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 Design Engineer responsible for providing input to Standing Instruction 95-13 has been counseled in accordance with the Waterford 3 Improving Human Performance Program. The Operations Management responsible for implementing Standing Instruction 95-13 has also been counseled in accordance with the Waterford 3 Improving Human Performance Program. Standing Instruction 95-13, which is associated with the ultimate heat sink, was revised to ensure that Technical Specification 3.7.4 compliance will be maintained under all circumstances. The information in revised Standing Instruction 95-13 has subsequently been incorporated into Administrative Procedure OP-100-014, "Technical Specification Compliance", and Standing Instruction 95-13 was canceled. In addition, all other Standing Instructions currently in the Control Room were reviewed to ensure that there were no other Standing Instructions which were in conflict with the Technical Specifications.

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

The lessons learned from the event described in Condition Report CR-96-0019 will be presented to Design Engineering Personnel. Operations Management will review Condition Report CR-96-0019 and management

expectations related to it with all Shift Supervisors and Control Room Supervisors in an Operations Department Meeting. Also, OI-016-000 will be reviewed and revised as necessary to provide additional guidance in the preparation and implementation of Standing Instructions. The additional guidance will include a requirement that the applicable Technical Specifications be reviewed prior to implementing a Standing Instruction.

(4) Date When Full Compliance Will Be Achieved

Waterford 3 will be in full compliance by May 1, 1996, when the following corrective steps which will be taken to avoid further violations are completed. The Design Engineering Department review of CR-96-0019 and the Operations Department review of CR-96-0019 with the appropriate personnel from these departments are scheduled to be completed by April 1, 1996. The review and necessary revisions to OI-016-000 are scheduled to be completed by May 1, 1996.