



**Entergy
Operations**

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W3F1-96-0055

A4.05

PR

April 25, 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 95-20
Reply to Notice of Violation

Gentlemen:

In accordance with 10CFR2.201, Entergy hereby submits in Attachment 1 the response to the violation identified in Enclosure 1 of the subject Inspection Report.

Please note that during an April 19, 1996, telephone conversation between Waterford 3 Licensing and an NRC Region IV representative, a six day extension for this response was granted. The due date for the response was therefore changed from April 19, 1996 to April 25, 1996.

In the cover letter of Inspection Report 95-20, you expressed heightened concern for this violation. We take this matter very serious. This is evidenced by the fact that these examples were self-identified and were a result of our previous corrective actions and on-going monitoring activities. Basically, this issue started with a questioning attitude, trying to find the causes of inadequate firewatch inspections. Since 1993, our QA group has been performing independent surveillances to assure that Security Officers perform adequately their fire watch duties. Once these issues were identified, prompt and thorough actions were taken. These actions included bringing in an independent investigation team (as detailed in Entergy's confidential response to Allegation Nos. RIV-95-A-0113 and RIV-95-A-0147) and an independent legal expert to thoroughly investigate related issues. Additionally, we installed a

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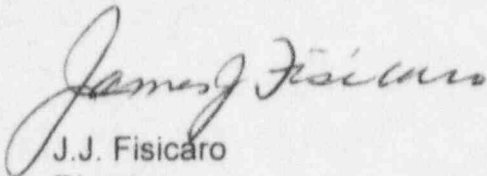
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Morse Watchman System (another barrier), took swift and substantial disciplinary actions where appropriate and initiated other controls to facilitate error detection and prevention. Entergy is committed to promptly identifying and preventing the recurrence of these types of violations.

Should you have any questions concerning this response, please contact me at (504) 739-6242 or Don Vinci at (504) 739-6370.

Very truly yours,

A handwritten signature in cursive script, appearing to read "James J. Fisicaro".

J.J. Fisicaro
Director
Nuclear Safety

JJF/OPP/ssf
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 RESPONSE TO THE VIOLATION IDENTIFIED IN ENCLOSURE 1 OF
INSPECTION REPORT 95-20

VIOLATION NO. 9520-02

Technical Specification 6.8.1.f requires the licensee to implement fire protection program procedures.

Licensee Procedure FP-001-014, "Duties of a Firewatch," Revision 9, Change 1, dated October 20, 1993, required that the fire watch log shall be completed and maintained by the assigned fire watcher at all times during his/her patrol. The procedure further required that the fire watch check the fire watch log upon physical observation of the room or area.

Licensee Procedure UNT-005-013, "Fire Protection Program," Revision 4, dated June 22, 1994, required a fire watch tour of the reactor auxiliary building annulus every 8 hours when fire detectors are out of service. In addition, the procedure required a fire watch tour of the reactor auxiliary building holdup tank room every hour when a rated 3-hour fire barrier in the room is impaired.

Contrary to the above, fire protection program procedures were not implemented as evidenced by the examples below:

1. On August 18, 1995, the licensee identified that a fire watch signed the fire watch log indicating completion of a fire watch tour inside Door 126 located in the reactor auxiliary building without physically observing the area that was required to be toured.
2. On August 17, 1995, the licensee identified that a previous fire watch log had not been completed and maintained by the assigned fire watch. Rather, the fire watch admitted signing for completion of a tour that was performed by another person.
3. On October 6-8, 1995, the licensee identified that fire watch tours of the reactor auxiliary building annulus were not performed every 8 hours when fire detectors were out of service.
4. From May 25 through August 11, 1995, the licensee identified that a fire watch tour of the reactor auxiliary building holdup tank room was not performed every hour when a rated 3-hour fire barrier in the room was impaired.

This is a Severity Level IV Violation. (Supplement I)

RESPONSE

(1) Reason for the Violation

In the case of examples 1 and 2 of the described violation, the root cause was willful violation of plant procedures by the involved fire watch personnel.

In the case of examples 3 and 4 of the violation, there were several factors that contributed to the violation. They were:

- Insufficient administrative controls to facilitate error free performance.
- Deficient supervision involvement in fire impairment planning, pre-job document review and post job document review.
- Lack of self-checking methods employed as part of the job process and in some cases a lack of procedural compliance.
- Insufficient management oversight in the area of alignment of resources.

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

Example one of the subject violation was identified by the Waterford 3 QA Surveillance Program and was evaluated under the plant Corrective Action Program (Condition Report 95-0690). The NRC was informed of the condition by Waterford 3 management in a conference call on August 22, 1995.

The second example of the subject violation was identified as a result of an investigation conducted by Entergy Operations Site Security into anonymous allegations made to the Entergy Operations Corporate Security Department in Jackson, Mississippi. It also was evaluated under the plant Corrective Action Program (Condition Report 95-0688). The NRC was informed of this condition in the conference call held on August 22, 1995.

Waterford 3 conducted an intensive investigation into both of the above two example cases. The General Manager, Plant Operations assigned an independent investigation team (IIT), led by the Quality Assurance group

to evaluate the incidents. Additional information concerning the investigation is contained in Entergy's confidential response (dated October 13, 1995) to Allegation Nos. RIV-95-A-0113 and RIV-95-A-0147.

Personnel identified as being involved with the willful violation of plant procedures for performing fire watches at Waterford 3 have had their employment terminated. Management expectations regarding procedure compliance, record accuracy, performance standards and the ramifications of willful violations have been reviewed with Security personnel.

Waterford 3 has installed electronic watch stations (Morse Watchman) throughout the plant, which require security guards to "key" into stations to validate their presence in the area. This system provides a barrier to ensure any bypassed inspections are readily detected.

Significant Condition Report CR-96-0081 was written to evaluate the adverse trend of fire watch discrepancies. A Root Cause Analysis Team was established to identify the root cause of the condition.

Direction was transmitted to various parties involved with preparing and authorizing fire impairments and parties involved with initiation of hourly fire watch patrols. In general these actions required that planned fire impairments and their associated fire watch patrol locations be reviewed by the Security organization as part of the planning process. This will ensure clear understanding of the area to be patrolled prior to actual system or component removal from service.

Appropriate procedures (i.e. FP-001-014, "Duties of a Firewatch" and FP-001-015, "Fire Protection System Impairments") have been revised to include more specific guidance to fire watch personnel and provide adequate administrative controls.

Security/Contract supervision is now more involved with fire impairment planning, pre-job document review and post job document review. Security/Contract supervision now receives impairment documentation from Control Room supervision and acknowledges a clear understanding of the area(s) affected at that time. A line has been added on the fire impairment form to identify the Security/Contract representative contacted by the Control Room, along with the present receipt acknowledgment signature. Security/Contract supervision assures that this information is accurately transferred to fire watch logs. Security/Contract supervision reviews completed fire watch logs.

To facilitate fire watch self-checking methods, a cross-reference listing has been developed for door numbers, room numbers, room noun names, and fire areas to assure a consistent language is used on fire impairment forms and the same language is transferred to fire watch forms. Also a procedure revision has been made to provide for peer review of changes made to fire watch logs.

Operations personnel have completed review the root cause analysis as part of Priority II required reading.

The large backlog of fire impairments has been reduced in an initiative to reduce the average number of impairments to 10 or less. The recent completion of Design Change 3268 (Fire Detection System Upgrade Mod) contributed significantly to reducing the number of fire impairments.

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

- Security will conduct training for fire watch personnel regarding the root cause analysis results. The training will be completed by 6/27/96.
- A training seminar will be conducted for maintenance and construction planners regarding the results of the root cause analysis. The training will be completed by 6/27/96.
- Will develop a "Team Ownership" culture with respect to the fire impairment process, providing appropriate training to personnel to ensure management's expectations are clearly understood at all levels. This will be completed by 10/31/96.
- A letter from the Vice President, Operations will be issued to Waterford 3 personnel on expectations regarding procedure compliance, record accuracy, performance standards and the ramifications of willful violations. This letter will be issued by May 30, 1996.

Although not tied to the specifics of this violation, Waterford 3 will perform additional reviews of the fire impairment process and implement improvements as appropriate. This will further enhance the quality and effectiveness of the fire impairment process.

(4) Date When Full Compliance Will Be Achieved

With actions already taken, the Waterford 3 fire watch program is currently in full compliance. The actions that remain to be completed will continue to improve our level of assurance that personnel will perform in accordance with management expectations.