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Director,
Nuclear Safety
Waterford 3

W3F1-96-0072
A4.05
PR

May 16, 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 96-03
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 Enclosure 1 of the subject Inspection Report.

The violation described in Inspection Report 96-03 involves a Limiting Condition for Operation (LCO) for the turbine driven emergency feedwater pump that was exceeded. This event was determined to be the result of a literal application of the Technical Specification associated with the turbine driven emergency feedwater pump.

By letter dated April 17, 1996, the Staff indicated that Waterford 3's response to the violation may reference or include previous docketed correspondence if the correspondence adequately addresses the required response. Waterford 3 submitted Licensee Event Report (LER) 96-002-00 on this event on February 23, 1996. The root cause and corrective actions for this event are included in that LER. Attachment 1 contains an abbreviated version of the LER. The Staff also requested

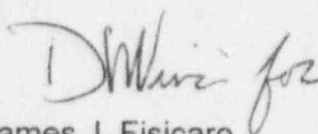
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that Waterford 3 specify the actions that will be taken to ensure that all interpretations of the Technical Specifications are appropriate. This information is also included in Attachment 1.

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,


James J. Fisicaro
Director
Nuclear Safety

JJF/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 96-03

VIOLATION NO. 9603-03

During an NRC inspection conducted on February 4 through March 16, 1996, 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:

Technical Specification 3.7.1.2 requires, in part, at least three independent steam generator emergency feedwater pumps be operable, with the turbine-driven feedwater pump capable of being powered from an operable steam supply system while the unit is in Modes 1-3. With one emergency feedwater pump inoperable, the action statement requires that the pump be restored to an operable status within 72 hours, or be in at least hot standby within the next 6 hours, and in hot shutdown within the following 6 hours.

Contrary to the above, from February 3-8, 1994 (approximately 116 hours), the turbine-driven emergency feedwater pump was inoperable while the unit was in Mode 1 in that Steam Supply Valve MS-401B (i.e., the steam supply system) was inoperable and was not restored to an operable status within 72 hours, or the unit placed in at least hot standby within the next 6 hours, and in hot shutdown within the following 6 hours.

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

RESPONSE

(1) Reason for the Violation

As described in LER-96-002-00, the 72 hour TS ACTION for the turbine driven emergency feedwater pump being out of service or inoperable was exceeded. This pump was inoperable from February 6, 1994, at 1445 hours until February 8, 1994, at 1117 hours. The root cause of this event was determined to be the misleading wording currently in TS 3.7.1.2. The TS Limiting Condition for Operation (LCO) requires that the pump be "capable of being powered from an OPERABLE steam supply system." There are two separate steam supplies (one from each steam generator) to the turbine driven emergency feedwater pump. Operations personnel believed that when one MS-401 valve was out of service, the turbine driven emergency feedwater pump would remain operable as long as the second valve was operable. This application of the TS did not consider an event where a Main

Steam or Main Feedwater line break occurs on the steam generator feeding the remaining steam supply valve and the single active failure involves a motor driven emergency feedwater pump. The accident analysis in Chapter 15 of the FSAR assumes an available emergency feedwater flow of 700 gpm (i.e., one turbine driven emergency feedwater pump or two electrical driven emergency feedwater pumps). The literal application of TS 3.7.1.2 resulted in this event.

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

As stated in LER-96-002-00, Change 1 to OP-100-014, "Technical Specification Compliance," added specific guidelines for the turbine driven emergency feedwater pump steam supply. These guidelines state that both steam supplies for the turbine driven emergency feedwater pump are required to be operable. If one steam supply is inoperable, the turbine driven emergency feedwater pump is to be declared inoperable.

In the cover letter to Inspection Report 96-03, Waterford 3 was requested to specify the actions that will be taken to ensure that all interpretations of the TS are appropriate. Waterford 3 has performed a Root Cause Analysis (RCA) concerning TS recognition and implementation. The following corrective steps have been taken as a result of performing the RCA.

1. The Operations Manager discussed the degraded trend associated with recognition and implementation of TS and Technical Requirements Manual specifications at a meeting of Shift Supervisors and Control Room Supervisors.
2. The Operations Manager added a brief discussion of the trend in the Daily Instructions. This included a short list of questions for Operators to ask themselves when evaluating LCOs.

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

In the future, Waterford 3 plans to adopt an emergency feedwater TS similar to that in NUREG 1432, "Standard Technical Specifications for Combustion Engineering Plants." Until this TS change is made, training on Change 1 to OP-100-014, "Technical Specification Compliance," will be provided to Operations personnel during Operator Requalification Training. This corrective step is also specified in LER-96-002-00.

Waterford 3 plans to convert to NUREG 1432, "Standard Technical Specifications for Combustion Engineering Plants" following completion of the Waterford 3 power uprate project.

The following additional corrective steps were identified as a result of performing the RCA referenced above and will be implemented.

1. Administrative Procedure OP-100-010 "Equipment Out of Service" will be revised as follows: (Completion Date 07/30/96)

- a. A shift Reactor Operator, Senior Reactor Operator (other than the Shift Supervisor), or the Shift Technical Advisor will be required to perform and document an initial screening of LCO applicability.
- b. The documentation for components taken out of service which have associated TS Actions will be separated from the documentation for components taken out of service which do not have TS Actions.
- c. Improvements will be made to facilitate tracking of plant conditions, which if changed, could affect LCO requirements.
- d. Improvements will be made to allow for tracking of all TS Actions entered, not just TS Actions entered due to declaring equipment out of service.

2. A reference document will be developed to assist Operators in identifying which LCOs to consider when removing equipment from service. After development, the reference document will be incorporated into the job planning and scheduling process to ensure that LCO actions are considered early in the process. (Completion Date 10/30/97)

3. Site Procedure W4.503 "Changes to the Technical Specifications, Technical Requirements Manual, or Core Operating Limits Reports" will be revised to provide a mechanism for requesting TS interpretation guidance. This will include a means for capturing the guidance provided. (Completion Date 08/30/96)

4. The Operations Manager will reinforce his expectations for dispositioning questions or potential problems with LCO implementations. (Completion Date 06/28/96)

5. The Operations Department will lead a team composed of the appropriate Licensing and Engineering personnel in performing a thorough review of the existing guidance in Administrative Procedure OP-100-014 "Technical Specification Compliance" to determine if the existing guidance accurately reflects management expectations. Upon completion of the review, the team will ensure that the information is presented in an easily understood, user friendly format that facilitates the easy location of guidance for particular LCOs. (Completion Date 07/31/96)

6. Shift Supervisors will review the RCA Report with their shift personnel. In addition, Systems Engineering personnel and the Plant Operations Review Committee will also review the RCA Report. (Completion Date 06/28/96)

(4) Date When Full Compliance Will Be Achieved

Waterford 3 is currently in full compliance. Corrective steps to address the generic concern for ensuring that TS interpretations are appropriate are scheduled to be completed as identified above.