



ENTERGY

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QA

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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 92-13

Gentlemen:

Entergy Operations, Inc. hereby submits the response to the emergency preparedness weakness identified during the 1992 Emergency Response Exercise and documented in the subject Inspection Report. This response is attached and includes an analysis of the weakness, a description of corrective measures and a schedule for completing these actions as requested.

If you have any questions concerning this response, please contact F.J. Englebracht, Emergency Planning & Administration Manager, at (504) 739-6607.

Very truly yours,

RFB/CJT/ssf
Attachment

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ATTACHMENT

ENTERGY OPERATIONS, INC. RESPONSE TO THE EMERGENCY EXERCISE

WEAKNESS DOCUMENTED IN INSPECTION REPORT 92-13

WEAKNESS NO. 9213-01:

The composition of one emergency repair team dispatched from the Operational Support Center was observed not to conform to station procedures. Specifically, Team 10 was dispatched to enter containment to close blowdown Valve 102 without assigning to this team a qualified operator. Emergency Plan Implementing Procedure EP-002-130, "Emergency Team Assignments," states that a qualified emergency team should be selected from Attachment 7.1, "OSC Emergency Team Matrix." This matrix indicates that for emergency repair operations, the team leader and primary team members should be selected from operations and maintenance. In addition, Station Administrative Procedure OP-100-001, "Duties and Responsibilities of Operators on Duty," Section 5.8.1.1 states that operational evolutions shall be conducted only by those personnel who have been appropriately trained, qualified and, where required, licensed.

The manipulation of the blowdown valve by an emergency repair team which did not include a qualified operations team member was identified as an exercise weakness.

RESPONSE

(1) Analysis of the Weakness

Entergy Operations, Inc. believes that the root cause of this weakness is an inadequate procedure in that EP-002-130, "Emergency Team Assignments," is unclear with respect to the composition of emergency repair teams. At present, this procedure implies that emergency repair teams should include a qualified operations team member.

The Operational Support Center (OSC) dispatched Emergency Repair Team 10 to enter containment to remove air from Blowdown (BD) valve 102A as a way to fail it closed. A qualified operator was not assigned to this team because the actions needed to remove air from BD 102A did not require this resource. Entergy Operations, Inc. considers the workload on operators too demanding during emergency conditions to have them on the scene with repair teams where operations activities may not be necessary, have already been performed, or are of limited scope. In keeping with this philosophy, Emergency Plan Implementing Procedure (EPiP) EP-002-130, "Emergency Team Assignments," Attachment 7.1, "OSC Emergency Team Matrix," is provided as an aid to facilitate the selection of individuals to emergency teams. As such, it is intended to indicate that emergency repair or emergency operations teams may be staffed primarily with maintenance personnel, operators, or both depending on the function of the specific team. It was not intended to require that a qualified operator be assigned to all emergency repair teams.

(2) Corrective Measures

Three specific corrective actions are planned:

1. EP-002-130 will be revised to provide clarification on the assignment of operators to emergency repair teams.
2. This weakness and the need to plan adequately repair team activities, considering various alternatives and utilizing planning resources (such as the Control Room) will be reviewed as a lesson learned. This will be accomplished through the Waterford 3 Training Department Supplemental Reading Program for TSC Emergency Coordinators, TSC Operations Coordinators, TSC Supervisors, CSC Supervisors, TSC Lead Engineers, EOF Directors, EOF Operations/Engineering Coordinators, and EOF Operations/Engineering Coordinator Assistants.
3. Training lesson plans for the positions listed in item 2, above, will be revised to include the information in the Supplemental Reading.

(3) Schedules for Completion

Corrective measures 1 and 2 will be completed by December 4, 1992.
Corrective measure 3 will be completed by March 5, 1993.