



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV

611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

OCT 24 1996

EA 96-255

Michael B. Sellman, Vice President
Operations - Waterford
Entergy Operations, Inc.
P.O. Box B
Killona, Louisiana 70066

SUBJECT: NRC INSPECTION REPORT 50-382/96-20

Dear Mr. Sellman:

From August 27-29, 1996, an NRC inspection was conducted at your Waterford Steam Electric Station, Unit 3, reactor facility, with in-office inspection and followup conducted through October 3, 1996. This inspection was conducted to further review information related to issues identified in NRC Inspection Report 50-382/96-09, dated July 24, 1996. A telephonic exit meeting was conducted on October 9, 1996, with you and members of your staff. The enclosed report presents the scope and results of the current inspection, and modifies certain apparent violations identified in NRC Inspection Report 50-382/96-09.

Previously, NRC Inspection Report 50-382/96-09 identified three apparent violations: (1) an apparent violation of Criterion XVI of Appendix B to 10 CFR Part 50 regarding a failure to promptly correct identified deficiencies in the inservice test program (IST); (2) an apparent violation of 10 CFR 50.55a and the ASME Code regarding a failure to include required valves in the IST plan; and, (3) an apparent violation of Technical Specification 4.0.5 regarding the failure to perform required testing on safety-related valves in the IST plan. These apparent violations were being considered for escalated action in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), NUREG-1600. A predecisional enforcement conference had been scheduled for August 12, 1996. However, your staff's follow-up to an unresolved item listed in the inspection report identified that the containment vacuum relief system may not have been built in accordance with the Final Safety Analysis Report (reference your Licensee Event Report 50-382/96-009, dated August 26, 1996). Because of concerns we had related to this issue, the predecisional enforcement conference was postponed and this current inspection was conducted.

Based upon the observations and findings developed during this inspection and, after reviewing the concerns detailed in NRC Inspection Report 50-382/96-09, we have determined that the issues related to the apparent violations of 10 CFR 50.55a and Technical Specification 4.0.5, are subsumed in the apparent violation of Criterion XVI of Appendix B to 10 CFR Part 50. Therefore, we are identifying one apparent violation from that inspection report, specifically that related to the Criterion XVI of Appendix B to

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10 CFR Part 50. Even though the number of apparent violations has been reduced, we expect your staff to fully discuss the circumstances related to all of these issues. This will allow the NRC to verify that these issues are appropriately encompassed within a single violation.

This inspection also identified two additional apparent violations which are being considered for escalated action in accordance with NRC's Enforcement Policy. These relate to: (1) a failure to close a containment spray valve following completion of pump testing; and (2) a failure to perform the required written safety evaluation to provide the bases for a determination that the difference between the facility design configuration and the Final Safety Analysis Report did not involve an unreviewed safety question. These three apparent violations incorporate all enforcement issues identified between the two NRC inspection reports; accordingly, no Notice of Violation is presently being issued for these inspection findings. In addition, please be advised that the number and characterization of apparent violations described in the enclosed inspection report may change as a result of further NRC review.

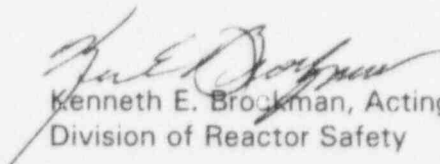
A predecisional enforcement conference to discuss these apparent violations will be scheduled with your staff. The decision to hold a predecisional enforcement conference does not mean that the NRC has determined that a violation has occurred or that enforcement action will be taken. This conference is being held to obtain information to enable the NRC to make an enforcement decision, such as a common understanding of the facts, root causes, missed opportunities to identify the apparent violations sooner, corrective actions, significance of the issues and the need for lasting and effective corrective action. We are also interested in your perspective regarding the risk significance of the failure to close containment spray Valve CS 118A. In addition, this is an opportunity for you to point out any errors in our inspection reports and for you to provide any information concerning your perspectives on 1) the severity of the violations, 2) the application of the factors that the NRC considers when it determines the amount of a civil penalty that may be assessed in accordance with Section VI.B.2 of the Enforcement Policy, and 3) any other application of the Enforcement Policy to this case, including the exercise of discretion in accordance with Section VII.

You will be advised by separate correspondence of the results of our deliberations on this matter. No response regarding these apparent violations is required at this time.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be placed in the NRC Public Document Room (PDR).

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,



Kenneth E. Brockman, Acting Director
Division of Reactor Safety

Docket No.: 50-382
License No.: NPF-38

Enclosure:
NRC Inspection Report
50-382/96-20

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E-Mail report to D. Nelson (DJN)

E-Mail report to NRR Event Tracking System (IPAS)

bcc to DMB (IE01)

bcc distrib. by RIV:

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DRP Director	DRS-PSB
Branch Chief (DRP/D)	MIS System
Project Engineer (DRP/D)	RIV File
Branch Chief (DRP/TSS)	
Leah Tremper (OC/LFDCB, MS: TWFN 9E10)	
G. F. Sanborn, EO	
W. L. Brown, RC	
OE:EA File, MS: 7-H-5	
J. Lieberman, OE, MS: 7-H-5	

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EO		D:DRP	AD:DRS		
GSanborn*		JEDyer	KEBrockman		
10/ /96		10/1/96	10/1/96		

*Previously concurred

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EO		D:DRP	AD:DRS		
GSanborn*		JEDyer	KEBrockman		
10/ /96		10/12/96	10/1/96		

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