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Waterford 3

W3F1-96-0213  
A4.05  
PR

December 13, 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 96-12  
Reply to Notice of Violation

Gentlemen:

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

In the inspection report, your staff expressed concern with Violation 9612-01 because it demonstrates that personnel continue to violate procedural requirements specifying the use of measuring and test equipment (M&TE). Waterford 3 shares this concern and has taken appropriate corrective actions. These corrective actions included, among other things, a review to determine the adequacy of barriers to prevent the use of incorrect M&TE. In addition, Waterford 3 has performed a review to address the broader implication of the violation; namely, failure to follow procedure requirements.

Review results indicate that violations relating to the failure to follow procedural requirements specifying the use of M&TE do not represent a deficiency in the M&TE program. These violations were the result of personnel error in that individuals failed to follow procedural and program requirements. The M&TE program contains adequate barriers to prevent the use of incorrect M&TE.

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NRC Inspection Report 96-12

Reply to Notice of Violation

W3F1-96-0213

Page 2

December 13, 1996

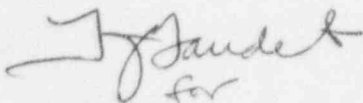
Reviews to determine the broader implications of this violation revealed an increasing trend in the number of human performance violations. To address that trend, the General Manager Plant Operation (GMPO) held a meeting with managers and supervisory personnel on December 12, 1996 to discuss the issue of procedure compliance. At that meeting, the GMPO discussed the trend in procedure non-compliance and reemphasized the requirement for strict adherence to procedures. The GMPO stated that those individuals who do not comply with plant procedures will be held accountable. The GMPO directed those at the meeting to disseminate this message to the work force and to followup to ensure that the message was clearly understood. In addition, procedural adherence and self-checking techniques (in M&TE and other areas) will be reemphasized to all plant personnel during plant safety and "All Hands" meetings. Multi-discipline teams will be developed to analyze recent work practice events to determine the existence of a generic concern, to identify underlying causes, and to develop appropriate corrective actions.

Your staff also expressed concern with Violation 9612-05 because the appropriate engineering analyses were not performed to qualify the wet cooling tower (WCT) basin water as a source of emergency feedwater. Waterford 3 also shares this concern and has taken appropriate corrective actions to address this matter. In 1983, the issue of using the WCT basin water as a source of emergency feedwater was discussed between Louisiana Power & Light (LP&L) and EBASCO. At that time, there was no controlled process to resolve technical issues such as this and documentation of a satisfactory resolution does not appear to exist. The current Waterford 3 program for resolving technical issues/questions is the Problem Evaluation/Information Request (PE/IR) which is controlled by site procedure W5.602. This process ensures that the disposition of technical issues/questions such as the one identified in this violation is adequately documented, reviewed, and approved.

NRC Inspection Report 96-12  
Reply to Notice of Violation  
W3F1-96-0213  
Page 3  
December 13, 1996

If you have any questions concerning this response, please contact me at (504) 739-6242 or Tim Gaudet at (504) 739-6666.

Very truly yours,

A handwritten signature in cursive script, appearing to read "J.J. Fisicaro", with a small "for" written below it.

J.J. Fisicaro  
Director  
Nuclear Safety

JJF/ELL/GCS/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 96-12

VIOLATION NO. 9612-01

Technical Specification 6.8.1 a requires, in part, that written procedures shall be maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A, Section 9, requires that the licensee have maintenance procedures.

Procedure OP-903-004, "Boric Acid Pump Operability Check," Section 3.2.4 required, in part, that the full-scale range of pressure instruments be three times the reference value or less.

Contrary to the above, on September 16, 1996, the licensee used a pressure instrument with a full-scale range that exceeded three times the reference value listed in Procedure OP-903-004.

This is a Severity Level IV violation (Supplement 1) (50-382/9612-01)

RESPONSE

(1) Reason for the Violation

Entergy Operations Inc. admits the violation and believes that the root cause was failure to follow a procedure in that an operator incorrectly used a gauge with a pressure range in excess of the procedural requirements established in OP-903-004, Boric Acid makeup Pump Operability Checks. This procedure, as stated in the violation description, requires, in part, that the full-scale range of pressure instruments be three times the reference value or less. The reference value in question was 8.6 psig and the range of the pressure gauge used was 0 to 50 psig. This range (0 to 50 psig) exceeds the range allowed for procedure OP-903-004.

The operator who selected the incorrect gauge indicated that he was aware of the requirement for the gauge's pressure range but indicated that he inadvertently overlooked this requirement when installing the gauge.

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

A condition report (Waterford 3's corrective action document), 96-1508, was generated to address this matter. The data collected using the 0 to 50 psig gauge was verified to be consistent with data taken with gauges in the correct range.

The operator involved with this event was counseled.

The Operations Manager held a meeting with operations personnel on November 23, 1996 to discuss personnel errors occurring in the operations department. The event specific to this violation was addressed at that meeting.

The General Manager Plant Operation (GMPO) held a meeting with managers and supervisory personnel on December 12, 1996 to discuss the issue of procedure compliance and personal accountability. The GMPO directed those at the meeting to disseminate this message to the work force and to followup to ensure that the message was clearly understood.

All operations personnel reviewed the condition report 96-1508.

In January of 1996 a review of condition reports documenting concerns in the M&TE Program was performed. The results indicated that the problems identified were too varied to be considered as common. However, the results also indicated that some of the condition reports did identify human performance issues. Prior to this violation, the most recent violations of M&TE requirements occurred in September and October of 1995 as documented in Inspection reports 95-08 and 95-09. Both of these violations were also attributed to inadequate human performance.

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

Due to an increasing negative trend in human performance, the procedural adherence to procedures and self checking techniques will be reemphasized to all plant personnel at the plant safety meetings and the all hands employee meetings.

Multi-discipline teams will be developed to analyze recent work practice events to determine the existence of a generic concern, to identify underlying causes, and to develop appropriate corrective actions.

The Maintenance Department will review the implementation of the M&TE program to determine if training needs to be enhanced in this area.

(4) Date When Full Compliance Will Be Achieved

Waterford 3 is currently in full compliance.

The above corrective actions will be completed by April 30, 1997.

ATTACHMENT 1

ENTERGY OPERATIONS, INC. RESPONSE TO THE VIOLATION IDENTIFIED IN  
ENCLOSURE 1 OF INSPECTION REPORT 96-12

VIOLATION NO. 9612-05

10 CFR Part 50, Appendix B, Criterion III states, in part, that measures shall be established to assure that the design basis, as defined in Part 50.2 and, as specified in the license application, are correctly translated into specifications and procedures.

Technical Specification 3.7.1.3 and Updated Final Safety Analysis Report Section 10.4.9 establish the wet cooling tower basins as a backup supply to the emergency feedwater pumps.

Updated Final Safety Analysis Report Section 10.4-9.1 establishes the required inventory for emergency feedwater.

Updated Final Safety Analysis Report Chapter 15 and the Combustion Engineering steam generator technical manual both assume a minimum emergency feedwater temperature of 70° F.

Contrary to the above, as of October 12, 1996, measures had not been established to ensure that the design basis was correctly translated into specifications and procedures. Specifically, the backup source of emergency feedwater, wet cooling tower basins, did not have adequate specifications/procedural requirements for maintaining the required inventory or basin temperature.

This is a Severity Level IV violation (Supplement 1) (50-382/9612-05)

RESPONSE

(1) Reason for the Violation

Entergy believes that the probable cause for allowing the Wet Cooling Tower (WCT) basins to be aligned to the Emergency Feedwater (EFW) pump suction is:

- a) Prior to plant startup, during development of the Technical Specifications for Emergency Feedwater, all accident scenarios that require both the UHS and the EFW system were not considered;



- b) The process used prior to start-up (i.e., 1983) for reviewing, resolving, and approving technical issues may have been inadequate. Correspondence between LP&L and EBASCO to resolve a technical issue concerning TS 3.7.1.3, Action (b), was not controlled in a systematic manner such that resolution and approval of the issue were obtained;
- c) Design control procedures were not adequate to ensure that all applicable design inputs were considered and incorporated into design documents. Correspondence between design organizations indicates they were aware of the 40° F temperature of the WCT but this input was not translated into the design of the steam generators.

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

Corrective action documents (condition reports) CR-96-1378, CR-96-1410, and CR-96-1441 were written to address these issues.

Reviewed the current process for requesting assistance to resolve technical problems, requests, or questions which is site procedure W5.602, "Problem Evaluation/Information Request." This procedure is adequate to ensure the disposition of technical issues is documented, reviewed, and approved.

Verified through discussion with Operations that the plant has never operated with the WCT basins lined up to EFW and has never been in the 7-day LCO for the Condensate Storage Pool (CSP) that would require it to be so. Administrative action has been implemented via Standing Instruction 96-21 to prevent the plant from entering the 7-day LCO.

A review of a sample of correspondence regarding requests for design information between the Architect Engineer and the NSSS vendor was made and a search conducted of the Licensing Research System. No other instances of inadequate translation of design basis information were found in the information reviewed. Some design basis inputs have changed since the original (such as Main Steam Isolation Valve closure time); however, these changes have been controlled by the Waterford 3 configuration control process.

Reviewed the design procedures and input checklists which are in place to prevent similar occurrences during the design change process. This includes Design Engineering Administrative Manual procedure ES-P-001, Design Inputs, which ensures all design inputs are considered, and ES-P-002, Design Verification, which ensures that design documents are adequately verified.



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

A TS change will be submitted to revise TS 3.7.1.3, Action (b), with an action commensurate with the importance of safety or to remove TS 3.7.1.3, Action (b), in its entirety.

Waterford 3 has already committed to revise its Technical Specifications in accordance with the Combustion Engineering Standard Technical Specifications. This revision should identify and resolve any similar situations that might be found.

A contract has been issued to ABB-Combustion Engineering to revise the design documentation of the steam generators to include a cold water feed of 40° F. The steam generator stress report, specification, technical manual, and other applicable documents will be revised accordingly. An interim evaluation was performed which identified that the safety analysis and the integrity of the steam generators were not affected.

(4) Date When Full Compliance Will Be Achieved

Waterford 3 is currently in full compliance based on measures currently in place for the PE/IR process and the administrative controls to prevent entry in the 7-day LCO for the CSP.

The change to TS 3.7.1.3, Action (b), will be submitted to the NRC by April 30, 1997.

The revision and evaluation being performed by CE are scheduled to be completed March 1, 1997.