



W3F1-97-0012
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PR

February 21, 1997

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
Reply to Systematic Assessment Licensee Performance (SALP)
Report 50-382/96-99

Gentlemen:

By letter dated January 6, 1997, the Nuclear Regulatory Commission (NRC) requested that Entergy Operations, Inc. provide written comments to address weaknesses in the Engineering functional area. The weaknesses are documented in the NRC's SALP report that covers Waterford 3 performance for the period April 30, 1995, through November 30, 1996. Enclosed (see Attachment 1) is Waterford 3's response to that request.

Your assessment of Waterford 3 reflects both a decline in our performance and a rebaselining of performance criteria. Although the issues identified by Waterford 3 and the NRC during the SALP period are well understood and addressed, we recognize that the plant's overall performance was unacceptable. That performance did not reflect the expectations of Entergy or the NRC.

Waterford 3 is committed to continuous improvement. To that end, we will continue to identify, correct and preclude the recurrence of adverse conditions. We will vigorously pursue improvements in all functional areas.

For example, in the Operations area, we have taken aggressive steps to address identified weaknesses such as procedural adherence. Operations is committed to enhancing their role as leaders and owners of the plant. Training continues to be

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a strong point for Operations. Organizational changes are being implemented to improve functionality and responsiveness. Furthermore, Operations will better utilize self assessments to assist in the discovery of plant problems and in the bounding of plant issues.

In the Maintenance area, we have developed a well-trained and competent staff. That staff is aggressively taking action to address weaknesses in human performance and procedural compliance on a broad scale. Maintenance will utilize INPO training in Human Performance and implement a task force to determine the root cause(s) of procedural compliance issues. We agree that our Maintenance backlogs are high but well controlled. However, we intend to use additional resources and overtime to reduce those backlogs. Design Engineering now has the responsibility for the IST plan. A comprehensive review of ASME class 1, 2, and 3 pumps and valves has been performed to ensure appropriate valves are in the plan. In addition, procedural controls have been implemented to ensure consistency between the IST and basis documents.

In the Plant Support Area, Waterford concurs with the assessment of its performance with the exception of your characterization that the 3-year average radiation exposure was at the national average. Waterford's three year average radiation exposure is better than approximately 70% of other operating domestic PWR plants. Your staff acknowledged that fact during the SALP public meeting. Waterford 3 has taken aggressive steps to address weaknesses identified in the SALP report and to continuously improve performance in this area. Enhancements in training, organization and processes have been made to strengthen personnel and department performances.

Currently, Waterford 3 has an aggressive self assessment schedule. These assessments will be more critical and intrusive and will better assist all functional areas in reaching higher performance levels. Finally, we believe that although our performance has improved, we hold people to higher standards of performance. The Timeless Principles and "True North" goals that have been set at Waterford 3 are the foundation upon which continuous improvement will be made.

Reply to SALP Report 96-99

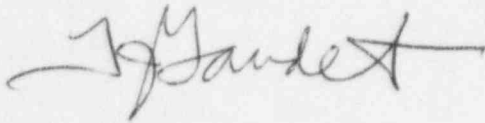
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If you have any questions concerning this letter or the attached response, please contact Tim Gaudet at (504) 739-6666.

Very truly yours,

A handwritten signature in black ink, appearing to read "T.J. Gaudet", with a long horizontal flourish extending to the right.

T.J. Gaudet
Acting - Director
Nuclear Safety & Regulatory Affairs

TJG/GCS/WDM/tjs
Attachment

cc: L.J. Callan (NRC Region IV)
C.P. Patel (NRC-NRR)
R.B. McGehee
N.S. Reynolds
NRC Resident Inspectors Office

Waterford 3 accepts the finding of the NRC in the Engineering section of the SALP report and acknowledges that significant work is ahead of us. Action plans, organizational changes, resource additions, and budgets are being developed to ensure that the implementation is appropriately integrated to achieve the expected results. Our immediate challenge is to further develop and sustain the high level of questioning attitude, work down the backlogs (focusing on the highest priority items first), and simultaneously embark on some major engineering program improvements.

Waterford 3 Engineering recognizes the need to aggressively identify problems, to thoroughly bound them, and to solve them the first time. As a result of initiatives implemented in early 1996, Engineering directly initiated, or indirectly participated in, 11 major assessments. Engineering is actively striving to minimize operator workarounds, long standing or repetitive temporary alterations, and compensatory actions. A prioritized modification list has resulted in approximately 40 planned modifications for RF08.

Waterford 3 is committed to licensing and design basis fidelity. It should be emphasized that Waterford's basic design is sound and provides opportunities to increase our confidence in its overall safety and reliability. Major programs are planned for the FSAR and design basis documents that will focus on retrieval, confirming assumptions, eliminating inconsistencies, preserving margin, and recapturing original design margin where required. Improved Technical Specification and IST programs are in progress. The challenge is to integrate these various actions, including FSAR review, improved Tech Specs, and 50.54(f) commitments, to get prompt results.

Another result of recent initiatives is changes that have been implemented to improve the quality of information provided to the control room. Engineering interface with the control room is more rigorous and formal. Engineering inputs are independently reviewed and treated within the design control program. Rigor in the control and use of assumptions and inputs has been tightened so that engineering outputs have appropriate documented bases. The technical review process has been improved and supervisors have been charged with the responsibility to maintain standards for quality, rigor, and bases of engineering evaluations. Refresher training has been given to all engineering staff qualified to perform 10CFR50.59 evaluations. The Design Review Committee has been implemented to provide ongoing oversight and assessment to ensure standards for performance are being met and to identify areas of additional improvement in a multi-discipline setting.

We understand and acknowledge that past occurrences have caused the commission to have concerns with Waterford 3's Engineering performance. As stated above, we feel that we have taken steps in the right direction to begin restoring confidence in the quality of Engineering products. At the same time, we have embarked on a course to provide tools which will greatly improve our ability to interpret and articulate our understanding of the Waterford 3 design and licensing bases.