

ENCLOSURE 1

NOTICE OF VIOLATION

Entergy Operations, Inc.
Waterford Steam Electric Station, Unit 3

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

During an NRC inspection conducted on April 6 through May 17, 1997, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. 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, is correctly translated into procedures and instructions. Design changes, including field changes, shall be subject to design-control measures commensurate with those applied to the original design and approved by the organization that performed the original design.

Technical Specification 4.6.2.1 requires that operators verify, once every 12 hours, that the containment spray riser level is ≥ 149.5 feet (181 feet mean sea level).

Calculation EC-191-027, "Containment Spray Riser Levels A & B Instrumentation Loop Uncertainty Calculation," Revision 0, dated July 6, 1993, documented that the instrument uncertainty was 9 feet.

Contrary to the above:

- As of April 4, 1997, the design basis was not correctly translated into procedures in that procedural/instructional requirements to limit emergency diesel generator loading were not implemented in accordance with Design Change 3055 because guidelines did not identify permissible loads on the emergency diesel generators.
- As of March 21, 1997, the design basis was not correctly translated into procedures in that the procedures for implementing Technical Specification 4.6.2.1 did not include an allowance for instrument uncertainty.
- As of April 4, 1997, a de facto field change was installed without design control measures commensurate with those applied to the original design and without approval by the organization that performed the original design. Specifically, new filter material was added to the original metal filter screens for the air cooling system to safety-related Cabinet CP-22 without engineering evaluation or approval to determine acceptability.
- As of May 17, 1997, the design basis was not correctly translated into procedures and instructions in that erroneous design inputs were listed in the Engineering Groundrules Document (e.g., maximum emergency feedwater flow, steam generator pressure at full power, etc.). This design information

is used by the fuel vendor in accident analysis calculations to determine whether thermal limits are exceeded.

This is a Severity Level IV violation (Supplement I) (50-382/9708-05).

- B. Technical Specification 6.8.1.a requires, in part, that written procedures shall be maintained covering 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.

Contrary to the above, preventive maintenance procedures were not maintained in that the procedures to ensure the proper operation of safety-related Breakers LTN-EBKR-311AB-6FL and -6FR were improperly deleted.

This is a Severity Level IV violation (Supplement I) (50-382/9708-06).

Pursuant to the provisions of 10 CFR 2.201, Entergy Operations, Inc. is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission. ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR and provide the legal basis to support your request for withholding the information from the public.

Dated at Arlington, Texas
this 19th day of June 1997