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Robert J. Murillo
Licensing Manager
Waterford 3

W3F1-2009-0013

April 27, 2009

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Subject: Licensee Event Report 09-001-00
Waterford Steam Electric Station, Unit 3 (Waterford 3)
Docket No. 50-382
License No. NPF-38

Dear Sir or Madam:

Entergy is hereby submitting Licensee Event Report (LER) 09-001-00 for the Waterford Steam Electric Station Unit 3. This report provides the details for a condition prohibited by Technical Specification when a mode change was made on May 30, 2008 with one of three Emergency Feedwater (EFW) Pumps being inoperable due to a lifted lead on the EFW pump governor valve control system.

This report is being submitted pursuant to 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by Technical Specifications. This report contains no new commitments.

The initial reportability evaluation performed in July 2008 determined that the condition was not reportable. Waterford 3 personnel identified the need for additional review in February 2009, and a subsequent reportability determined that the condition was reportable. This oversight has been entered into the Waterford 3 corrective action program.

This report contains no new commitments. Please contact Robert J. Murillo, Manager, Licensing at (504) 739-6715 if there are any questions regarding this report.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert J. Murillo".

RJM/MEM/ssf

Attachment: Licensee Event Report 09-001-00

IE22
NCR

(w/Attachment)
cc: Mr. Elmo E. Collins, Jr.
Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
612 E. Lamar Blvd., Suite 400
Arlington, TX 76011-4125

NRC Senior Resident Inspector
Waterford Steam Electric Station Unit 3
P.O. Box 822
Killona, LA 70066-0751

U. S. Nuclear Regulatory Commission
Attn: Mr. N. Kalyanam
Mail Stop O-07D1
Washington, DC 20555-0001

Wise, Carter, Child & Caraway
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Jackson, MS 39205

Winston & Strawn
ATTN: N.S. Reynolds
1700 K Street, NW
Washington, DC 20006-3817

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1111 Pennsylvania Avenue, NW
Washington, DC 20004

Louisiana Department of Environmental Quality
Office of Environmental Compliance
Surveillance Division
P. O. Box 4312
Baton Rouge, LA 70821-4312

R.K. West, lerevents@inpo.org - INPO Records Center

Attachment

W3F1-2009-0013

Licensee Event Report 09-001-00

| | | |
|---|-------------------------------------|--------------------------|
| 1. FACILITY NAME Waterford 3 Steam Electric Station | 2. DOCKET NUMBER 05000382 | 3. PAGE 1 OF 3 |
|---|-------------------------------------|--------------------------|

4. TITLE
 3.0.4 Violation: Mode Change with an Inoperable Emergency Feedwater Pump

| 5. EVENT DATE | | | 6. LER NUMBER | | | 7. REPORT DATE | | | 8. OTHER FACILITIES INVOLVED | |
|---------------|-----|------|---------------|-------------------|--------|----------------|-----|------|------------------------------|---------------|
| MONTH | DAY | YEAR | YEAR | SEQUENTIAL NUMBER | REV NO | MONTH | DAY | YEAR | FACILITY NAME | DOCKET NUMBER |
| 05 | 30 | 2008 | 2009 | 001 | 00 | 04 | 27 | 2009 | NA | 05000 |
| | | | | | | | | | FACILITY NAME | DOCKET NUMBER |
| | | | | | | | | | NA | 05000 |

| | | | | | | | | | | |
|-------------------------------|--|---|---|---|--|--|--|--|--|--|
| 9. OPERATING MODE 3 | 11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply) | | | | | | | | | |
| | <input type="checkbox"/> 20.2201(b) | <input type="checkbox"/> 20.2203(a)(3)(i) | <input type="checkbox"/> 50.73(a)(2)(i)(C) | <input type="checkbox"/> 50.73(a)(2)(vii) | | | | | | |
| 10. POWER LEVEL 00 | <input type="checkbox"/> 20.2201(d) | <input type="checkbox"/> 20.2203(a)(3)(ii) | <input type="checkbox"/> 50.73(a)(2)(ii)(A) | <input type="checkbox"/> 50.73(a)(2)(viii)(A) | | | | | | |
| | <input type="checkbox"/> 20.2203(a)(1) | <input type="checkbox"/> 20.2203(a)(4) | <input type="checkbox"/> 50.73(a)(2)(ii)(B) | <input type="checkbox"/> 50.73(a)(2)(viii)(B) | | | | | | |
| | <input type="checkbox"/> 20.2203(a)(2)(i) | <input type="checkbox"/> 50.36(c)(1)(i)(A) | <input type="checkbox"/> 50.73(a)(2)(iii) | <input type="checkbox"/> 50.73(a)(2)(ix)(A) | | | | | | |
| | <input type="checkbox"/> 20.2203(a)(2)(ii) | <input type="checkbox"/> 50.36(c)(1)(ii)(A) | <input type="checkbox"/> 50.73(a)(2)(iv)(A) | <input type="checkbox"/> 50.73(a)(2)(x) | | | | | | |
| | <input type="checkbox"/> 20.2203(a)(2)(iii) | <input type="checkbox"/> 50.36(c)(2) | <input type="checkbox"/> 50.73(a)(2)(v)(A) | <input type="checkbox"/> 73.71(a)(4) | | | | | | |
| | <input type="checkbox"/> 20.2203(a)(2)(iv) | <input type="checkbox"/> 50.46(a)(3)(ii) | <input type="checkbox"/> 50.73(a)(2)(v)(B) | <input type="checkbox"/> 73.71(a)(5) | | | | | | |
| | <input type="checkbox"/> 20.2203(a)(2)(v) | <input type="checkbox"/> 50.73(a)(2)(i)(A) | <input type="checkbox"/> 50.73(a)(2)(v)(C) | <input type="checkbox"/> OTHER | | | | | | |
| | <input type="checkbox"/> 20.2203(a)(2)(vi) | <input checked="" type="checkbox"/> 50.73(a)(2)(i)(B) | <input type="checkbox"/> 50.73(a)(2)(v)(D) | Specify in Abstract below or in NRC Form 366A | | | | | | |

12. LICENSEE CONTACT FOR THIS LER

| | |
|--|--|
| FACILITY NAME Waterford 3 Steam Electric Station Michael E. Mason | TELEPHONE NUMBER (Include Area Code) (504) 739-6673 |
|--|--|

13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT

| CAUSE | SYSTEM | COMPONENT | MANUFACTURER | REPORTABLE TO EPIX | CAUSE | SYSTEM | COMPONENT | MANUFACTURER | REPORTABLE TO EPIX |
|-------|--------|-----------|--------------|--------------------|-------|--------|-----------|--------------|--------------------|
| | | | | | | | | | |

| | | | | |
|--|-------------------------------------|-------|-----|------|
| 14. SUPPLEMENTAL REPORT EXPECTED <input type="checkbox"/> YES (If yes, complete 15. EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO | 15. EXPECTED SUBMISSION DATE | MONTH | DAY | YEAR |
| | | | | |

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)

This LER reports a condition prohibited by Technical Specification when a mode change was made with one of three required Emergency Feedwater (EFW) Pumps unknowingly inoperable. On May 30, 2008, at 0824, Waterford 3 entered MODE 3 with Emergency Feedwater Pump AB inoperable due to a lifted lead on the EFW pump governor valve control system. The mode change was not in conformance with LCO 3.0.4 which precludes entry in a mode or other specified condition in the Applicability statement when an LCO is not met and the ACTION requires a plant shutdown if the LCO is not met within a specified interval. LCO 3.7.1.2 requires three Emergency Feedwater Pumps to be OPERABLE in Modes 1, 2, and 3. Emergency Feedwater Pump AB has a 72 hours Allowed Outage Time (AOT) with a required plant shutdown per Technical Specification 3.7.1.2 ACTION d.

There have been no previous similar licensee events reported in the last three years.

**LICENSEE EVENT REPORT (LER)
CONTINUATION SHEET**

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| | | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | | |
| Waterford 3 Steam Electric Station | 05000382 | 2009 | - 001 | - 00 | 2 | OF 3 |

NARRATIVE

REPORTABLE OCCURRENCE

On May 30, 2008, at 0824, Waterford 3 entered MODE 3 with Emergency Feedwater [BA] Pump AB unknowingly inoperable. With the calibration for the EFW Pump governor valve control system incomplete, a lead remained lifted which would have only allowed the Emergency Feedwater Pump (EFW Pp) AB to come up to "minimum" speed and thus incapable of performing its safety function. The mode change was not in conformance with LCO 3.0.4 which precludes entry into a MODE or other specified condition in the Applicability statement when an LCO is not met, and the ACTION requires a plant shutdown if the LCO is not met within a specified interval. LCO 3.7.1.2 requires three Emergency Feedwater Pumps to be OPERABLE in Modes 1, 2, and 3. Emergency Feedwater Pump AB is one of the three Emergency Feedwater Pumps required OPERABLE by LCO 3.7.1.2. LCO 3.7.1.2, ACTION (d), has a plant shutdown ACTION with EFW Pp AB inoperable.

INITIAL CONDITIONS

The plant was in Mode 3 when this condition occurred. There were no other structures, systems, or components inoperable at the time of the determination that contributed to the condition.

EVENT DESCRIPTION

On May 30, 2008, at 0824, Waterford 3 entered MODE 3. When the plant entered MODE 3, the EFW Pp AB governor valve lead was in the lifted position which would have limited the EFW Pp AB to "minimum" speed. At 1002, Operations declared EFW Pp AB inoperable for testing and entered Technical Specification (TS 3.7.1.2 a) not realizing the pump was already inoperable due to maintenance. Upon completion of EFW Pp AB governor valve calibration, the lifted lead was re-landed. Subsequently, on May 31, 2008, at 0406, Waterford 3 declared EFW Pp AB OPERABLE. The EFW Pp AB was declared OPERABLE within TS Surveillance Requirement (SR) 4.7.1.2.b allowed 24 hours and within the TS AOT. TS SR 4.7.1.2.b allows 24 hours after steam generators reach 750 psig to establish suitable test conditions to perform the Inservice Testing SR.

CAUSAL FACTORS

The apparent cause for the plant entering Mode 3 when the EFW AB Pp was inoperable is that there were ineffective procedural barriers in place to ensure the EFW AB Pp was OPERABLE prior to entry into Mode 3.

**LICENSEE EVENT REPORT (LER)
CONTINUATION SHEET**

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| | | 2009 | - 001 | - 00 | | |

NARRATIVE

CORRECTIVE ACTIONS

Additional procedural barriers have been put in place to ensure EFW Pp AB is OPERABLE prior to entering Mode 3.

SAFETY SIGNIFICANCE

There was minimal safety significance for this condition. EFW Pp AB TS SR 4.7.1.2.b allows 24 hours after exceeding 750 psig in the steam generators to perform Inservice Testing. The surveillance for EFW Pp AB was completed and the EFW Pp AB declared OPERABLE within 24 hours after steam generators reached 750 psig as allowed by TS SR 4.7.1.2.b. The condition prohibited by TS was a verbatim nonconformance with TS LCO 3.0.4 when the plant entered Mode 3 with the EFW AB Pump inoperable. Although TSSR 4.7.1.2.b allows 24 hours from the time when steam generators reach 750 psig to establish suitable test conditions, perform post maintenance activities, and perform Inservice Testing, there is no exception documented in the TS specifying an exception to TS LCO 3.0.4 for entering Mode 3 with EFW Pp AB inoperable.

SIMILAR EVENTS

Waterford 3 has no similar events within the past three years.

ADDITIONAL INFORMATION

Energy industry identification system (EIIIS) codes are identified in the text within brackets [].