UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
612 EAST LAMAR BLVD, SUITE 400
ARLINGTON, TEXAS 76011-4125

May 10, 2010

Joseph Kowalewski, Vice President, Operations
Entergy Operations, Inc.
Waterford Steam Electric Station, Unit 3
17265 River Road
Killona, LA 70057-0751

Subject: WATERFORD STEAM ELECTRIC STATION, UNIT 3 – NRC INTEGRATED INSPECTION REPORT 05000382/2010002

Dear Mr. Kowalewski:

On March 31, 2010, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at your Waterford Steam Electric Station, Unit 3. The enclosed integrated inspection report documents the inspection findings, which were discussed on April 7, 2010, with Charlie Arnone, General Manager of Plant Operations and other members of your staff.

The inspections examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

This report documents one NRC identified finding of very low safety significance (Green). The finding was determined to involve a violation of NRC requirements. However, because of the very low safety significance and because it was entered into your corrective action program, the NRC is treating the finding as a noncited violation, consistent with Section VI.A.1 of the NRC Enforcement Policy. If you contest the violation or the significance of the noncited violation, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555-0001, with copies to the Regional Administrator, U.S. Nuclear Regulatory Commission, Region IV, 612 E. Lamar Blvd, Suite 400, Arlington, Texas, 76011-4125; the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555-0001; and the NRC Resident Inspector at the Waterford Steam Electric Station, Unit 3 facility. In addition, if you disagree with the characterization of any finding in this report, you should provide a response within 30 days of the date of this inspection report, with the basis for your disagreement, to the Regional Administrator, Region IV, and the NRC Resident Inspector at the Waterford Steam Electric Station, Unit3. The information you provide will be considered in accordance with Inspection Manual Chapter 0305.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, and its enclosure, will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

Sincerely,

/RA/ Ray Azua for

Jeffrey A Clark, P.E.
Chief, Project Branch E
Division of Reactor Projects

Docket: 50-382
License: NPF-38

Enclosure:
NRC Inspection Report 05000382/2010002
w/Attachment: Supplemental Information

cc w/Enclosure:

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ROPreports

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ADAMS: □ No ☒ Yes	☒ SUNSI Review Complete	Reviewer Initials: JAC
	☒ Publicly Available	☒ Non-Sensitive
	□ Non-publicly Available	□ Sensitive

RIV:SRI:DRP/E	RI:DRP/E	SPE:DRP/E	C:DRS/EB1	C:DRS/EB2
SSandal	DHOverland	RVAzua	TFarnholtz	NFO'Keefe
/RA/	***/RA/***	***/RA/***	***/RA/***	***/RA/***
04/17/2010	04/17/2010	04/22/2010	04/26/2010	04/23/2010

C:DRS/OB	C:DRS/PSB1	C:DRS/PSB2	C:DRP/E	
SMGarchow	MPShannon	GEWerner	JAClark	
/RA/	***/RA/***	***/RA/***	***/RA/R.Azua for***	
04/26/2010	04/22/2010	04/22/2010	05/07/2010	

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U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket:	05000382
License:	NPF-38
Report:	05000382/2010002
Licensee:	Entergy Operations, Inc.
Facility:	Waterford Steam Electric Station, Unit 3
Location:	17265 River Road Killona, LA
Dates:	January 1 through March 31, 2010
Inspectors:	Shane Sandal, Senior Resident Inspector (acting) Dean Overland, Resident Inspector
Approved By:	Jeff Clark, P.E., Chief, Project Branch E Division of Reactor Projects

SUMMARY OF FINDINGS

IR 05000382/2010002; 01/01/2010 – 03/31/2010; Waterford Steam Electric Station, Unit 3; Fire Protection.

The report covered a 3-month period of inspection by resident inspectors. One Green noncited violation was identified. The significance of most findings is indicated by their color (Green, White, Yellow, or Red) using Inspection Manual Chapter 0609, "Significance Determination Process." Findings for which the significance determination process does not apply may be Green or be assigned a severity level after NRC management review. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 4, dated December 2006.

A. NRC-Identified Findings and Self-Revealing Findings

Cornerstone: Initiating Events

- Green. The inspectors identified five examples of a green noncited violation of Waterford Steam Electric Station, Unit 3's license condition 2.C.9 for the failure to perform a transient combustible evaluation prior to introducing transient combustibles into procedurally controlled vital plant areas. Specifically, procedures limit the amount of transient combustibles that may be introduced into the control room ventilation equipment room, the component cooling water Train B heat exchanger room, and the main steam isolation valve Train B roof area. Any amounts greater than the preset procedural limits require a transient combustible evaluation to be performed. In all five cases, this evaluation was not performed prior to introduction of the transient combustibles. This violation has been entered into the licensee's corrective action program as condition reports CR-WF3-2010-0482, CR-WF3-2010-0598, and CR-WF3-2009-4035.

  The performance deficiencies associated with this violation were the failure to comply with Waterford Steam Electric Station, Unit 3's license condition 2.C.9. Specifically, the procedural requirements to perform a transient combustible evaluation prior to introducing the transient combustibles into designated fire zones were not performed. Since several of the previously described fire zones fail to meet 10 CFR50, Appendix R train separation requirements, use of Inspection Manual Chapter 0612, Appendix E to screen for minor examples is not appropriate. This condition is greater than minor because, if left uncorrected, it would become a more significant safety concern, since continued introduction of unevaluated transient combustible loading into controlled areas could significantly reduce the ability to achieve a safe shutdown condition, in the event of a fire in that controlled area. The inspectors evaluated the finding using Inspection Manual Chapter 0609, Appendix F, Fire Protection Significance Determination Process, to assess the safety significance. Since the severity of the observed deficiencies was assigned a low degradation rating, it was determined to be of very low risk significance. This finding had a crosscutting aspect in the area of human performance associated with the work practices component in that the licensee failed to utilize appropriate human error prevention techniques by (1) discussing transient combustible controls and

expectations during pre-job briefs and (2) effectively utilizing human performance barriers, such as posted door signs [H.4(a)]. (Section 1R05)

B. Licensee-Identified Violations

None

REPORT DETAILS

Summary of Plant Status

The plant began the inspection period on January 1, 2010, at 100 percent power and remained at approximately 100 percent power for the rest of the inspection period.

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity, and Emergency Preparedness

1R01 Adverse Weather Protection (71111.01)

.1 Readiness for Impending Adverse Weather Conditions

a. Inspection Scope

The inspectors performed a review of the adverse weather procedures for seasonal extreme low temperatures. The inspectors verified that weather-related equipment deficiencies identified during the previous year were corrected prior to the onset of seasonal extremes, and evaluated the implementation of the adverse weather preparation procedures and compensatory measures for the affected conditions before the onset of, and during, the adverse weather conditions.

During the inspection, the inspectors focused on plant-specific design features and the procedures used by plant personnel to mitigate or respond to adverse weather conditions. Additionally, the inspectors reviewed the Updated Final Safety Analysis Report and performance requirements for systems selected for inspection, and verified that operator actions were appropriate as specified by plant-specific procedures. Specific documents reviewed during this inspection are listed in the attachment. The inspectors also reviewed corrective action program items to verify that plant personnel were identifying adverse weather issues at an appropriate threshold and entering them into their corrective action program in accordance with station corrective action procedures. The inspectors' reviews focused specifically on the following plant systems:

- On January 4, 2010, the inspectors walked down the component cooling water system, including the dry cooling towers, the auxiliary component cooling water system, including the wet cooling towers, and the fire protection system.

These activities constitute completion of one (1) readiness for seasonal adverse weather sample as defined in Inspection Procedure 71111.01-05.

b. Findings

No findings of significance were identified.

1R04 Equipment Alignments (71111.04)

.1 Partial Walkdown

a. Inspection Scope

The inspectors performed partial system walkdowns of the following risk-significant systems:

- February 3, 2010: Component cooling water Train B
- March 24, 2010: Controlled ventilation area system Train A

The inspectors selected these systems based on their risk significance relative to the reactor safety cornerstones at the time they were inspected. The inspectors attempted to identify any discrepancies that could affect the function of the system, and, therefore, potentially increase risk. The inspectors reviewed applicable operating procedures, system diagrams, Updated Final Safety Analysis Report, technical specification requirements, administrative technical specifications, outstanding work orders, condition reports, and the impact of ongoing work activities on redundant trains of equipment in order to identify conditions that could have rendered the systems incapable of performing their intended functions. The inspectors also walked down accessible portions of the systems to verify system components and support equipment were aligned correctly and operable. The inspectors examined the material condition of the components and observed operating parameters of equipment to verify that there were no obvious deficiencies. The inspectors also verified that the licensee had properly identified and resolved equipment alignment problems that could cause initiating events or impact the capability of mitigating systems or barriers and entered them into the corrective action program with the appropriate significance characterization. Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of two (2) partial system walkdown samples as defined in Inspection Procedure 71111.04-05.

b. Findings

No findings of significance were identified.

.2 Complete Walkdown

a. Inspection Scope

On January 11, 2010, the inspectors performed a complete system alignment inspection of the Train B emergency diesel generator to verify the functional capability of the system. The inspectors selected this system because it was considered both safety-significant and risk-significant in the licensee's probabilistic risk assessment. The inspectors walked down the system to review mechanical and electrical equipment line ups, electrical power availability, system pressure and temperature indications, as appropriate, component labeling, component lubrication, component and equipment cooling, hangers and supports, operability of support systems, and to ensure that ancillary equipment or debris did not interfere with equipment operation. The inspectors reviewed a sample of past and outstanding work orders to determine whether any

deficiencies significantly affected the system function. In addition, the inspectors reviewed the corrective action program database to ensure that system equipment-alignment problems were being identified and appropriately resolved. Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of one (1) complete system walkdown sample as defined in Inspection Procedure 71111.04-05.

b. Findings

No findings of significance were identified.

1R05 Fire Protection (71111.05)

.1 Quarterly Fire Inspection Tours

a. Inspection Scope

The inspectors conducted fire protection walkdowns that were focused on availability, accessibility, and the condition of firefighting equipment in the following risk-significant plant areas:

- January 22, 2010: Fire Zones RAB 1A, 1B, and 1C
- January 25, 2010: Fire Zones RAB 5, 7A, 7B, 7C, and 7D
- February 8, 2010: Fire Zones RAB 17, 20, and 21
- March 16, 2010: Fire Zones 33, 35, and 38

The inspectors reviewed areas to assess if licensee personnel had implemented a fire protection program that adequately controlled combustibles and ignition sources within the plant; effectively maintained fire detection and suppression capability; maintained passive fire protection features in good material condition; and had implemented adequate compensatory measures for out of service, degraded or inoperable fire protection equipment, systems, or features, in accordance with the licensee's fire plan. The inspectors selected fire areas based on their overall contribution to internal fire risk as documented in the plant's Individual Plant Examination of External Events with later additional insights, their potential to affect equipment that could initiate or mitigate a plant transient, or their impact on the plant's ability to respond to a security event. Using the documents listed in the attachment, the inspectors verified that fire hoses and extinguishers were in their designated locations and available for immediate use; that fire detectors and sprinklers were unobstructed, that transient material loading was within the analyzed limits; and fire doors, dampers, and penetration seals appeared to be in satisfactory condition. The inspectors also verified that minor issues identified during the inspection were entered into the licensee's corrective action program. Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of four (4) quarterly fire-protection inspection samples as defined in Inspection Procedure 71111.05-05.

b. Findings

Introduction. The inspectors identified five examples of a green noncited violation of Waterford 3 Steam Electric Station license condition 2.C.9 for the failure to perform a transient combustible evaluation prior to introducing transient combustibles into procedurally controlled vital plant areas. Specifically, procedures limit the amount of transient combustibles that may be introduced into the control room ventilation equipment room, the component cooling water Train B heat exchanger room, and the main steam isolation valve Train B roof area. Any amounts greater than the preset procedural limits require a transient combustible evaluation to be performed. In all five cases, this evaluation was not performed prior to introduction of the transient combustibles.

Description. On three separate occasions, inspectors discovered unevaluated transient combustibles in combustible control areas. On January 22, 2010, during a fire protection inspection activity, the inspectors discovered scaffolding erected in the control room heating and ventilation equipment room (Fire Zone RAB 1B). This plant area is procedurally defined in EN-DC-161 "Control of Combustibles," as a Level 2 control area. Transient combustibles totaling less than 100 pounds of lumber may be introduced into a Level 2 control area without performing a transient combustible evaluation (TCE). However, since the scaffolding appeared to use more than 100 pounds of lumber, the inspector requested to view the TCE for the area. No TCE had been performed. When a TCE was performed, it was discovered that the room contained over 200 pounds of lumber.

On February 8, 2010, during a second fire protection inspection activity, the inspectors discovered unevaluated transient combustibles in the component cooling water heat exchanger Train B room (Fire Zone RAB 17). This plant area is procedurally defined as a Level 1 control area. In a Level 1 control area, *no* transient combustibles are allowed into the area without first being evaluated. An extension cord and two drop lights had been introduced into the fire zone, but had not been evaluated.

As part of this inspection activity, the inspectors reviewed previous plant condition reports, and identified that on July 30, 2009, during a previous fire protection inspection activity, the inspectors had discovered transient combustibles in the main steam isolation valve Train B area (Fire Zone Roof E). This plant area is also procedurally defined in EN-DC-161, Control of Combustibles, as a Level 1 control area. The inspectors had requested to view the TCE for the area, but no evaluation had been completed.

Additionally, on two separate occasions, the licensee discovered unevaluated transient combustibles in combustible control areas. Both of these discoveries were the result of an extent of condition review following previous inspector discoveries. On August 6, 2009, the licensee identified unevaluated transient combustibles in Fire Zone RAB 17. The transient combustibles consisted of multiple leak collection devices.

On January 28, 2010, during another extent of condition review, the licensee once again identified an amount of unevaluated transient combustibles in Fire Zone RAB 17. The Level 1 control area contained approximately 91 pounds worth of lumber for scaffolding. Additionally, 13 other scaffolds in Level 2 control areas exceeded the 100 pound screening criteria described in EN-DC-161.

Fire Zones RAB 17 and RAB 1B are required to be compliant with 10 CFR 50, Appendix R. Due to amounts of Hemyc fire wrap in each room, neither of the two fire zones meets the Appendix R requirements for separation of safe shutdown trains, and both rooms are subject to an hourly fire watch.

Analysis. The performance deficiencies associated with this violation were the failure to comply with Waterford 3 Steam Electric Station license condition 2.C.9. Specifically, the procedural requirements to perform a transient combustible evaluation prior to introducing the transient combustibles into designated fire zones were not performed. Since several of the previously described fire zones failed to meet Appendix R train separation requirements, use of Inspection Manual Chapter 0612, Appendix E to screen for minor examples is not appropriate. This condition is greater than minor because, if left uncorrected, it would become a more significant safety concern, since continued introduction of unevaluated transient combustible loading into controlled areas could significantly reduce the ability to achieve a safe shutdown condition, in the event of a fire in that controlled area. The inspectors evaluated the finding using Inspection Manual Chapter 0609, Appendix F, Fire Protection Significance Determination Process, to assess the safety significance. Since the severity of the observed deficiencies was assigned a low degradation rating, it was determined to be of very low risk significance (Green). This finding had a crosscutting aspect in the area of human performance associated with the work practices component in that the licensee failed to utilize appropriate human error prevention techniques by (1) discussing transient combustible controls and expectations during pre-job briefs and (2) effectively utilizing human performance barriers, such as posted door signs [H.4(a)].

Enforcement. Waterford 3 Steam Electric Station license condition 2.C.9 requires that the licensee implement their fire protection program as described in the updated final safety analysis report, which states in section 9.5.1.3.1.B, that the fire protection program will be implemented in accordance with UNT-005-013, “Fire Protection Program.” UNT-005-013, section 5.4.2, states that transient combustibles will be controlled in accordance with EN-DC-161, “Control of Combustibles.” EN-DC-161, section 5.6, discusses when a TCE is required. Contrary to this requirement, on multiple occasions (July 30 and August 6, 2009 and January 22, 28, and February 8, 2010), it was identified that the licensee failed to perform a TCE when procedurally required. These conditions exited for varying periods of time. The licensee took immediate corrective actions upon discovery. Because this violation was of very low safety significance and was entered in the corrective action program as Condition Reports CR-WF3-2010-0482, CR-WF3-2010-0598, and CR-WF3-2009-4035, this violation is being treated as a noncited violation, consistent with Section VI.A of the NRC Enforcement Policy: NCV 05000382/2010002-01, Failure to Control Transient Combustibles.

1R11 Licensed Operator Requalification Program (71111.11)

a. Inspection Scope

On February 1, 2010, the inspectors observed a crew of licensed operators in the plant’s simulator to verify that operator performance was adequate, evaluators were identifying and documenting crew performance problems, and training was being conducted in accordance with licensee procedures. The inspectors evaluated the following areas:

- Licensed operator performance
- Crew's clarity and formality of communications
- Crew's ability to take timely actions in the conservative direction
- Crew's prioritization, interpretation, and verification of annunciator alarms
- Crew's correct use and implementation of abnormal and emergency procedures
- Control board manipulations
- Oversight and direction from supervisors
- Crew's ability to identify and implement appropriate technical specification actions and emergency plan actions and notifications

The inspectors compared the crew's performance in these areas to pre-established operator action expectations and successful critical task completion requirements. Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of one (1) quarterly licensed-operator requalification program sample as defined in Inspection Procedure 71111.11.

b. Findings

No findings of significance were identified.

1R12 Maintenance Effectiveness (71111.12)

a. Inspection Scope

The inspectors evaluated degraded performance issues involving the following risk significant systems:

- February 19, 2010: Emergency diesel generators
- March 4, 2010: Instrument air and station air compressors

The inspectors reviewed events such as where ineffective equipment maintenance has resulted in valid or invalid automatic actuations of engineered safeguards systems and independently verified the licensee's actions to address system performance or condition problems in terms of the following:

- Implementing appropriate work practices
- Identifying and addressing common cause failures
- Scoping of systems in accordance with 10 CFR 50.65(b)
- Characterizing system reliability issues for performance
- Charging unavailability for performance

- Trending key parameters for condition monitoring
- Ensuring proper classification in accordance with 10 CFR 50.65(a)(1) or (a)(2)
- Verifying appropriate performance criteria for structures, systems, and components classified as having an adequate demonstration of performance through preventive maintenance, as described in 10 CFR 50.65(a)(2), or as requiring the establishment of appropriate and adequate goals and corrective actions for systems classified as not having adequate performance, as described in 10 CFR 50.65(a)(1)

The inspectors assessed performance issues with respect to the reliability, availability, and condition monitoring of the system. In addition, the inspectors verified maintenance effectiveness issues were entered into the corrective action program with the appropriate significance characterization. Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of two (2) quarterly maintenance effectiveness samples as defined in Inspection Procedure 71111.12-05.

b. Findings

No findings of significance were identified.

1R13 Maintenance Risk Assessments and Emergent Work Control (71111.13)

a. Inspection Scope

The inspectors reviewed licensee personnel's evaluation and management of plant risk for the maintenance and emergent work activities affecting risk-significant and safety-related equipment listed below to verify that the appropriate risk assessments were performed prior to removing equipment for work:

- January 29, 2010: Scheduled surveillance to test plant protection system Channel A
- February 9, 2010: Main turbine digital electrohydraulic control system shifted from automatic control to manual control due to control system card failure
- February 25, 2010: Transfer of control element assembly subgroups to hold bus for troubleshoot and repair of rod motion failure alarm
- March 8, 2010: DC ground on feedwater pump B trip and control power circuit

The inspectors selected these activities based on potential risk significance relative to the reactor safety cornerstones. As applicable for each activity, the inspectors verified that licensee personnel performed risk assessments as required by 10 CFR 50.65(a)(4) and that the assessments were accurate and complete. When licensee personnel performed emergent work, the inspectors verified that the licensee personnel promptly assessed and managed plant risk. The inspectors reviewed the scope of maintenance work, discussed the results of the assessment with the licensee's probabilistic risk analyst or shift technical advisor, and verified plant conditions were consistent with the

risk assessment. The inspectors also reviewed the technical specification requirements and inspected portions of redundant safety systems, when applicable, to verify risk analysis assumptions were valid and applicable requirements were met. Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of four (4) maintenance risk assessments and emergent work control inspection samples as defined in Inspection Procedure 71111.13-05.

b. Findings

No findings of significance were identified.

1R15 Operability Evaluations (71111.15)

a. Inspection Scope

The inspectors reviewed the following issues:

- January 21, 2010: Degraded coupling identified on Train B auxiliary component cooling water (ACCW) pump
- January 25, 2010: Seismic evaluation of scaffolding erected above dry cooling tower Train B diesel driven sump pump
- January 27, 2010: Evaluation of controlled ventilation area system due to doors D168 and D161 not fully closing when opened
- March 25, 2010: Seismic evaluation of scaffolding erected above component cooling water heat exchanger Train B

The inspectors selected these potential operability issues based on the risk-significance of the associated components and systems. The inspectors evaluated the technical adequacy of the evaluations to ensure that technical specification operability was properly justified and the subject component or system remained available such that no unrecognized increase in risk occurred. The inspectors compared the operability and design criteria in the appropriate sections of the technical specifications and Updated Safety Analysis Report to the licensee's evaluations, to determine whether the components or systems were operable. Where compensatory measures were required to maintain operability, the inspectors determined whether the measures in place would function as intended and were properly controlled. The inspectors determined, where appropriate, compliance with bounding limitations associated with the evaluations. Additionally, the inspectors also reviewed a sampling of corrective action documents to verify that the licensee was identifying and correcting any deficiencies associated with operability evaluations. Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of four (4) operability evaluation inspection samples as defined in Inspection Procedure 71111.15-05

b. Findings

No findings of significance were identified.

1R18 Plant Modifications (71111.18)

Temporary Modifications

a. Inspection Scope

The inspectors reviewed the following temporary modifications to verify that the safety functions of important safety systems were not degraded:

- March 25, 2010: Temporary modification to clear reactor vessel head leak-off pressure alarm annunciator

The inspectors reviewed the temporary modification and the associated safety evaluation screening against the system design bases documentation, including the Updated Final Safety Analysis Report and the technical specifications, and verified that the modification did not adversely affect the system operability/availability. The inspectors also verified that the installation and restoration were consistent with the modification documents and that configuration control was adequate. Additionally, the inspectors verified that the temporary modification was identified on control room drawings, appropriate tags were placed on the affected equipment, and licensee personnel evaluated the combined effects on mitigating systems and the integrity of radiological barriers.

These activities constitute completion of one (1) sample for temporary plant modifications as defined in Inspection Procedure 71111.18-05

b. Findings

No findings of significance were identified.

1R19 Postmaintenance Testing (71111.19)

a. Inspection Scope

The inspectors reviewed the following postmaintenance activities to verify that procedures and test activities were adequate to ensure system operability and functional capability:

- January 27, 2010: Scheduled equipment outage for preventative and elective maintenance on chemical volume control charging Pump B

- February 1, 2010: Scheduled equipment outage for preventative maintenance on auxiliary component cooling water Pump A

- February 3, 2010: Replacement of component cooling water Pump AB mechanical seal

- February 24, 2010: Troubleshooting and repairs for failed SIX6 relay on low pressure safety injection Pump B

The inspectors selected these activities based upon the structure, system, or component's ability to affect risk. The inspectors evaluated these activities for the following (as applicable):

- The effect of testing on the plant had been adequately addressed; testing was adequate for the maintenance performed
- Acceptance criteria were clear and demonstrated operational readiness; test instrumentation was appropriate

The inspectors evaluated the activities against the technical specifications, the Updated Final Safety Analysis Report, 10 CFR Part 50 requirements, licensee procedures, and various NRC generic communications to ensure that the test results adequately ensured that the equipment met the licensing basis and design requirements. In addition, the inspectors reviewed corrective action documents associated with postmaintenance tests to determine whether the licensee was identifying problems and entering them in the corrective action program and that the problems were being corrected commensurate with their importance to safety. Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of four (4) postmaintenance testing inspection samples as defined in Inspection Procedure 71111.19-05.

b. Findings

No findings of significance were identified.

1R22 Surveillance Testing (71111.22)

a. Inspection Scope

The inspectors reviewed the Updated Final Safety Analysis Report, procedure requirements, and technical specifications to ensure that the surveillance activities listed below demonstrated that the systems, structures, and/or components tested were capable of performing their intended safety functions. The inspectors either witnessed or reviewed test data to verify that the significant surveillance test attributes were adequate to address the following:

- Preconditioning
- Evaluation of testing impact on the plant
- Acceptance criteria
- Test equipment
- Procedures
- Jumper/lifted lead controls

- Test data
- Testing frequency and method demonstrated technical specification operability
- Test equipment removal
- Restoration of plant systems
- Fulfillment of ASME Code requirements
- Updating of performance indicator data
- Engineering evaluations, root causes, and bases for returning tested systems, structures, and components not meeting the test acceptance criteria were correct
- Reference setting data
- Annunciators and alarms setpoints

The inspectors also verified that licensee personnel identified and implemented any needed corrective actions associated with the surveillance testing.

- January 12, 2010: Scheduled inservice surveillance test of low pressure safety injection Pump A
- January, 14, 2010: Scheduled surveillance test of component cooling water Pump A discharge check Valve CC-123A
- January 26, 2010: Train B emergency diesel generator and subgroup relay operability test
- February 8, 2010: Train A emergency diesel generator and subgroup relay operability test
- March 29, 2010: Train AB battery bank operability verification test

Specific documents reviewed during this inspection are listed in the attachment.

These activities constitute completion of five (5) surveillance testing inspection samples as defined in Inspection Procedure 71111.22-05.

b. Findings

No findings of significance were identified.

Cornerstone: Emergency Preparedness

1EP6 Drill Evaluation (71114.06)

.1 Emergency Preparedness Drill Observation

a. Inspection Scope

The inspectors evaluated the conduct of a routine licensee emergency drill on February 24, 2010, to identify any weaknesses and deficiencies in classification, notification, and protective action recommendation development activities. The inspectors observed emergency response operations in the Simulator Control Room, the Technical Support Center, the Operations Support Center, and the Emergency Offsite Facility to determine whether the event classification, notifications, and protective action recommendations were performed in accordance with procedures. The inspectors also attended the licensee drill critique to compare any inspector-observed weakness with those identified by the licensee staff in order to evaluate the critique and to verify whether the licensee staff was properly identifying weaknesses and entering them into the corrective action program. As part of the inspection, the inspectors reviewed the drill package and other documents listed in the attachment.

These activities constitute completion of one (1) sample as defined in Inspection Procedure 71114.06-05.

b. Findings

No findings of significance were identified.

.2 Training Observations

a. Inspection Scope

The inspectors observed a simulator training evolution for licensed operators on February 1, 2010, which required emergency plan implementation by a licensee operations crew. This evolution was planned to be evaluated and included in performance indicator data regarding drill and exercise performance. The inspectors observed event classification and notification activities performed by the crew. The inspectors also attended the postevolution critique for the scenario. The focus of the inspectors' activities was to note any weaknesses and deficiencies in the crew's performance and ensure that the licensee evaluators noted the same issues and entered them into the corrective action program. As part of the inspection, the inspectors reviewed the scenario package and other documents listed in the attachment.

These activities constitute completion of one (1) sample as defined in Inspection Procedure 71114.06-05.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator Verification (71151)

.1 Data Submission Issue

a. Inspection Scope

The inspectors performed a review of the data submitted by the licensee for the fourth Quarter 2009 performance indicators for any obvious inconsistencies prior to its public release in accordance with Inspection Manual Chapter 0608, "Performance Indicator Program."

This review was performed as part of the inspectors' normal plant status activities and, as such, did not constitute a separate inspection sample.

b. Findings

No findings of significance were identified.

.2 Unplanned Scrams per 7000 Critical Hours

a. Inspection Scope

The inspectors sampled licensee submittals for the unplanned scrams per 7000 critical hours performance indicator for the period from the fourth quarter 2008 through the fourth quarter 2009. To determine the accuracy of the performance indicator data reported during those periods, the inspectors used definitions and guidance contained in NEI Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 6. The inspectors reviewed the licensee's operator narrative logs, issue reports, event reports and NRC integrated inspection reports for the period of January 2009 through February 2010 to validate the accuracy of the submittals. The inspectors also reviewed the licensee's issue report database to determine if any problems had been identified with the performance indicator data collected or transmitted for this indicator and none were identified. Specific documents reviewed are described in the attachment to this report.

These activities constitute completion of one (1) unplanned scrams per 7000 critical hours sample as defined in Inspection Procedure 71151-05.

b. Findings

No findings of significance were identified.

.3 Unplanned Scrams with Complications

a. Inspection Scope

The inspectors sampled licensee submittals for the unplanned scrams with complications performance indicator for the period from the fourth quarter 2008 through the fourth quarter 2009. To determine the accuracy of the performance indicator data reported during those periods, the inspectors used definitions and guidance contained in NEI Document 99-02, "Regulatory Assessment Performance Indicator Guideline,"

Revision 6. The inspectors reviewed the licensee's operator narrative logs, issue reports, event reports and NRC integrated inspection reports for the period of January 2009 through February 2010 to validate the accuracy of the submittals. The inspectors also reviewed the licensee's issue report database to determine if any problems had been identified with the performance indicator data collected or transmitted for this indicator and none were identified. Specific documents reviewed are described in the attachment to this report.

These activities constitute completion of one (1) unplanned scrams with complications sample as defined in Inspection Procedure 71151-05.

b. Findings

No findings of significance were identified.

.4 Unplanned Transients per 7000 Critical Hours

a. Inspection Scope

The inspectors sampled licensee submittals for the unplanned transients per 7000 critical hours performance indicator for the period from the fourth quarter 2008 through the fourth quarter 2009. To determine the accuracy of the performance indicator data reported during those periods, the inspectors used definitions and guidance contained in NEI Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 6. The inspectors reviewed the licensee's operator narrative logs, issue reports, maintenance rule records, event reports and NRC Integrated Inspection reports for the period of January 2009 through February 2010 to validate the accuracy of the submittals. The inspectors also reviewed the licensee's issue report database to determine if any problems had been identified with the performance indicator data collected or transmitted for this indicator and none were identified. Specific documents reviewed are described in the attachment to this report.

These activities constitute completion of one (1) unplanned transients per 7000 critical hours sample as defined in Inspection Procedure 71151-05.

b. Findings

No findings of significance were identified.

4OA2 Identification and Resolution of Problems (71152)

Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity, Emergency Preparedness, Public Radiation Safety, Occupational Radiation Safety, and Physical Protection

.1 Routine Review of Identification and Resolution of Problems

a. Inspection Scope

As part of the various baseline inspection procedures discussed in previous sections of this report, the inspectors routinely reviewed issues during baseline inspection activities and plant status reviews to verify that they were being entered into the licensee's corrective action program at an appropriate threshold, that adequate attention was being

given to timely corrective actions, and that adverse trends were identified and addressed. The inspectors reviewed attributes that included the complete and accurate identification of the problem; the timely correction, commensurate with the safety significance; the evaluation and disposition of performance issues, generic implications, common causes; contributing factors, root causes, extent of condition reviews, and previous occurrences reviews; and the classification, prioritization, focus, and timeliness of corrective. Minor issues entered into the licensee's corrective action program because of the inspectors' observations are included in the attached list of documents reviewed.

These routine reviews for the identification and resolution of problems did not constitute any additional inspection samples. Instead, by procedure, they were considered an integral part of the inspections performed during the quarter and documented in Section 1 of this report.

b. Findings

No findings of significance were identified.

.2 Daily Corrective Action Program Reviews

a. Inspection Scope

In order to assist with the identification of repetitive equipment failures and specific human performance issues for follow-up, the inspectors performed a daily screening of items entered into the licensee's corrective action program. The inspectors accomplished this through review of the station's daily corrective action documents.

The inspectors performed these daily reviews as part of their daily plant status monitoring activities and, as such, did not constitute any separate inspection samples.

b. Findings

No findings of significance were identified.

.3 Selected Issue Follow-up Inspection

a. Inspection Scope

During a review of items entered in the licensee's corrective action program, the inspectors recognized a corrective action item documenting actions taken by the licensee to address the failure of a Main Steam Reheater B relief valve on October 19, 2009. The inspectors considered the following during the review of the licensee's actions: (1) complete and accurate identification of problems in a timely manner; (2) evaluation and disposition of operability/reportability issues; (3) consideration of extent of condition, generic implications, common cause, and previous occurrences; (4) classification and prioritization of the resolution of the problem; (5) identification of root and contributing causes of the problem; (6) identification of corrective actions; and (7) completion of corrective actions in a timely manner.

These activities constitute completion of one (1) in-depth problem identification and resolution sample as defined in Inspection Procedure 71152-05.

b. Findings

No findings of significance were identified.

4OA5 Other Activities

.1 Quarterly Resident Inspector Observations of Security Personnel and Activities

a. Inspection Scope

During the inspection period, the inspectors performed observations of security force personnel and activities to ensure that the activities were consistent with Waterford Steam Electric Station security procedures and regulatory requirements relating to nuclear plant security. These observations took place during both normal and off-normal plant working hours.

These quarterly resident inspector observations of security force personnel and activities did not constitute any additional inspection samples. Rather, they were considered an integral part of the inspectors' normal plant status review and inspection activities.

b. Findings

No findings of significance were identified.

4OA6 Meetings

Exit Meeting Summary

On April 7, 2010, the inspectors presented the inspection results to Mr. Charles Arnone, General Manager of Plant Operations and other members of the licensee staff. The licensee acknowledged the issues presented. The inspector asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee Personnel

C. Alday, Manager, System Engineering
C. Arnone, General Manager, Plant Operations
D. Becker, Technical Specialist IV, Programs and Components
E. Begley, Senior Engineer, Programs and Components
E. Brauner, Supervisor, System Engineering
B. Briner, Technical Specialist IV, Programs and Components
A. Buford, Engineer II, System Engineering
K. Christian, Director, Nuclear Safety Assurance
K. Cook, Manager, Operations
C. Fugate, Assistant Manager, Operations
J. Hashim, Senior Engineer, Programs and Components
M. Haydel, Supervisor, Programs and Components
J. Hornsby, Manager, Chemistry
J. Kowalewski, Vice President of Operations
B. Lanka, Manager, Design Engineering
B. Lindsey, Manager, Maintenance
M. Mason, Senior Licensing Specialist, Licensing
W. McKinney, Manager, Corrective Action and Assessments
R. Murillo, Manager, Licensing
K. Nichols, Director, Engineering
A. Piluti, Manager, Radiation Protection
J. Pollack, Engineer, Licensing
R. Putnam, Manager, Programs and Components
T. Qualantone, Manager, Plant Security
J. Williams, Senior Licensing Specialist, Licensing

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened and Closed

05000382-01	NCV	Failure to Control Transient Combustibles (Section 1R05)

LIST OF DOCUMENTS REVIEWED

Section 1R01: Adverse Weather Protection

PROCEDURES/DOCUMENTS

NUMBER	TITLE	REVISION
OP-002-007	Freeze Protection and Temperature Maintenance	14

Section 1R04: Equipment Alignment

CONDITION REPORTS

CR-WF3-2009-2392	CR-WF3-2009-2393	CR-WF3-2009-3975	CR-WF3-2009-4460
CR-WF3-2009-5082	CR-WF3-2009-5778		

WORK ORDERS

85680	93505	124892	51693724
51798176	52206856		

PROCEDURES/DOCUMENTS

NUMBER	TITLE	REVISION
OP-002-003	Component Cooling Water System	305
OP-009-002	Emergency Diesel Generator	308
OP-903-052	Controlled Ventilation Area System Operability Check	9
SD-HVR	Reactor Auxiliary Building HVAC	9
W3-DBD-041	Safety Related HVAC – RAB Design Basis Document	2-7

Section 1R05: Fire Protection

CONDITION REPORTS

CR-WF3-2009-4035	CR-WF3-2009-4060	CR-WF3-2009-4080	CR-WF3-2010-0482
CR-WF3-2010-0598	CR-WF3-2010-0808	CR-WF3-2010-1133	CR-WF3-2010-1887
CR-WF3-2010-1977			

PROCEDURES/DOCUMENTS

NUMBER	TITLE	REVISION/ DATE
EC-F91-019	Calculation for Transient Combustible Evaluation of RAB-17	2/5/10
EN-DC-161	Control of Combustibles	3
Evaluation 10-003	Calculation for Transient Combustible Evaluation	2/5/10
FP-001-014	Duties of a Fire Watch	14
FP-001-015	Fire Protection System Impairments	303
G-1360	Fire Protection Reactor Auxiliary Bldg. Plan EL +46.00’	2
G-1375	Fire Protection Reactor Auxiliary Bldg. Plan EL +35.00’	1
MM-007-010	Fire Extinguisher Inspection and Replacement	304
NTP-202	Fire Protection Training	301
OP-009-004	Fire Protection	307
UNT-005-013	Fire Protection Program	10

Section 1R11: Licensed Operator Requalification Program

PROCEDURES/DOCUMENTS

NUMBER	TITLE	REVISION / DATE
E-115	Simulator Scenario	6/18/2006
OP-901-212	Rapid Plant Power Reduction	3
OP-902-000	Standard Post Trip Actions	10

Section 1R12: Maintenance Effectiveness

CONDITION REPORTS

CR-WF3-2008-4393	CR-WF3-2008-4534	CR-WF3-2008-4669	CR-WF3-2008-5183
CR-WF3-2008-5354	CR-WF3-2008-5677	CR-WF3-2009-0310	CR-WF3-2009-0430
CR-WF3-2009-0441	CR-WF3-2009-0600	CR-WF3-2009-0716	CR-WF3-2009-0986
CR-WF3-2009-1949	CR-WF3-2009-2253	CR-WF3-2009-2321	CR-WF3-2009-2415
CR-WF3-2009-2675	CR-WF3-2009-2861	CR-WF3-2009-2897	CR-WF3-2009-3744
CR-WF3-2009-3907	CR-WF3-2009-5114	CR-WF3-2009-5337	CR-WF3-2009-5703
CR-WF3-2009-6631	CR-WF3-2009-6815	CR-WF3-2009-6870	CR-WF3-2009-7007

PROCEDURES/DOCUMENTS

NUMBER	TITLE	REVISION
EN-DC-206	Maintenance Rule (a)(1) Process	1

NUMARC 93-01	Industry Guideline for Monitoring the Effectiveness of maintenance at Nuclear Power Plants	3

Section 1R13: Maintenance Risk Assessment and Emergent Work Controls

CONDITION REPORTS

CR-WF3-2008-4299 CR-WF3-2010-0813 CR-WF3-2010-1390

PROCEDURES/DOCUMENTS

NUMBER	TITLE	REVISION
EN-WM-101	On-line Work Management Process	6
OI-037-000	Operations' Risk Assessment Guideline	2
OP-005-007	Main Turbine and Generator	14
OP-901-301	Electrical System Ground	1
OP-903-107	Plant Protection System Channel A & B & C & D Functional Test	303
TRM-3.3.4	Turbine Overspeed Protection	107

Section 1R15: Operability Evaluations

CONDITION REPORTS

CR-WF3-2010-0377 CR-WF3-2010-0561

WORK ORDERS

193456 52212741

PROCEDURES/DOCUMENTS

NUMBER	TITLE	REVISION/ DATE
EN-MA-133	Control of Scaffolding	6
EN-OP-104	Operability Determination Process	4
EN-WM-101	On-Line Work Management Process	6
MC15-34757	Scaffold Request Form	1/15/07
MC15-34758	Scaffold Request Form	1/15/07
OI-037-000	Operations Risk Management Guideline	300
OP-002-001	Auxiliary Component Cooling Water	302
OP-100-010	Equipment Out of Service	303
PMC-002-006	Erecting Scaffold	302
SD-CC	System Description – Component Cooling Water	12
W2.502	Configuration Risk Management Program Implementation	0

Section 1R18: Plant Modifications

WORK ORDERS

167886

NUMBER	TITLE	REVISION
EN-DC-115	Engineering Change Process	4
EN-DC-134	Design Verification	3
EN-DC-136	Temporary Modifications	5
EN-DC-213	Engineering Quality Review	0
EN-LI-100	Process Applicability Determination	8

EN-LI-101	10CFR50.59 Evaluations	5
Eval 2010-02	Reactor Vessel Head Leakoff Pressure Alarm	0
TMOD 19897	Reactor Vessel Head Leakoff Pressure Alarm	0

Section 1R19: Postmaintenance Testing

CONDITION REPORTS

CR-WF3-2009-7420

WORK ORDERS

85680	93505	116231	141065
161811	170237	180716	201079
203400	204129	204143	206476
209365	211260	227139	52189245
52199368	52206856		

PROCEDURES/DOCUMENTS

NUMBER	TITLE	REVISION/ DATE
EN-LI-102	Corrective Action Process	14
EN-LI-118	Root Cause Analysis Process	9
EN-MA-125	Attachment 9.3, Troubleshooting Control Form	6/ 2/23/10
ME-007-005	Attachment 12.2, Time Delay Relay Setting Check and Adjustment Record of Performance	14/ 2/23/10

OP-002-003	Component Cooling Water System	305
OP-003-034	Feed Heater Vents and Drains	3
OP-903-003	Charging Pump Operability Check	302
OP-903-050	Component Cooling Water and Auxiliary Component Cooling Water Pump and Valve Operability Test	24
OP-903-068	Emergency Diesel Generator and Subgroup Relay Operability Test	303
OP-903-128	Category A Leak Test	5
SD-CD	Condensate System Description	8
SD-ES	Extraction Steam System Description	8

Section 1R22: Surveillance Testing

CONDITION REPORTS

CR-WF3-2010-0686 CR-WF3-2010-1718 CR-WF3-2010-1722

WORK ORDERS

220997	52198710	52211598	52213005
52215465	52216735	52217210	52217769
52218161	52219326	52225763	52226973

PROCEDURES/DOCUMENTS

NUMBER	TITLE	REVISION

ME-003-200	Station Battery Bank and Charger (Weekly)	305-306
ME-003-210	Station Battery Bank and Charger (Quarterly)	18
OP-903-030	Safety Injection Pump Operability Verification	18
OP-903-050	Component Cooling Water and Auxiliary Component Cooling Water Pump and Valve Operability Test	23
OP-903-068	Emergency Diesel Generator and Subgroup Relay Operability Verification	303

Section 1EP6: Drill Evaluation

PROCEDURES/DOCUMENTS

NUMBER	TITLE	REVISION / DATE
	Green Team Site Drill	2/24/2010
E-115	Simulator Scenario	6/18/2006
EP-001-001	Recognition and Classification of Emergency Conditions	22
EP-001-030	Site Area Emergency	300
EP-001-040	General Emergency	300

Section 4OA1: Performance Indicator Verification

CONDITION REPORTS

CR-WF3-2009-4916 CR-WF3-2009-5469 CR-WF3-2009-5470 CR-WF3-2009-5475

CR-WF3-2009-7420

WORK ORDERS

23696 102051

PROCEDURES/DOCUMENTS

NUMBER	TITLE	REVISION
NEI 99-02	Regulatory Assessment Performance Indicator Guideline	6
OP-902-000	Standard Post Trip Actions	10

Section 4OA2: Problem Identification and Resolution

CONDITION REPORTS

CR-WF3-2009-4916 CR-WF3-2009-5469 CR-WF3-2009-5470 CR-WF3-2009-5475

CR-WF3-2010-1453

WORK ORDERS

23696 102051

PROCEDURES/DOCUMENTS

NUMBER	TITLE	REVISION
EN-LI-102	Corrective Action Process	14
EN-LI-118	Root Cause Analysis Process	9-12