



UNITED STATES  
**NUCLEAR REGULATORY COMMISSION**  
REGION IV  
1600 EAST LAMAR BLVD  
ARLINGTON, TEXAS 76011-4511

August 7, 2013

EA-13-098

Donna Jacobs  
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 INSPECTION  
REPORT 05000382/2013007 AND NRC INVESTIGATION REPORT  
NO. 4-2012-021**

Dear Ms. Jacobs:

This letter refers to an investigation initiated by the U. S. Nuclear Regulatory Commission's (NRC) Office of Investigations (OI) in March 2012 at Waterford Steam Electric Station, Unit 3 (Waterford 3). The purpose of the investigation was to determine whether an individual employed as an electrical contractor at Waterford 3 falsified procedure paperwork.

As a result of the investigation, the NRC confirmed that, contrary to the following, the former electrical contractor willfully falsified procedure paperwork by signing a work package with the initials of another person. Technical Specification 6.8.1 states, in part, "Written procedures shall be established, implemented and maintained covering the activities referenced below:

The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978."

Regulatory Guide 1.33, Appendix A, Section 9.e, states, in part, "General procedures for the control of maintenance, repair, replacement, and modification work should be prepared before reactor operation is begun." Licensee Procedure EN-MA-101, "Fundamentals of Maintenance," Revision 9, provided instructions for complying with regulatory requirements, plant programs and procedures that control task performance in addition to, or in conjunction with, work-specific procedures. Procedure EN-MA-01 step 5.6[1] of Procedure EN-MA-101 states, in part:

Work activities are documented accurately and completely in Work Packages and Maintenance Procedures. The following expectations are implemented during the completion of records that document the actions of the work activity

If you are signing for someone else, then always sign your name and state for the person you are signing (e.g., John Smith for John Doe).

Contrary to the above, on November 16, 2010, a contract employee willfully signed work package 224179, Task 6, Documentation of Cable Installation for Cable number 3SSPP82, step 4.3.5, Sections 10.1.8, 10.2.19, and 10.3.1 (one example) with the initials of another person, for work that he did not perform and did not state that he was signing for the other person.

The former electrical contractor's falsifications were discovered by your staff through an internal investigation in November 2011. Through your internal process and corrective actions, the former electrical contractor was prohibited from working at Waterford 3 for one year and the NRC was informed. As a result of the NRC's investigation, no additional falsifications were found by the individual in question or by other staff.

Because you are responsible for the actions of your employees, and because the violation involved willful aspects, the violation was evaluated under the traditional enforcement process as set forth in the NRC Enforcement Policy. The NRC concluded that the violation, absent willfulness, would be considered a minor violation because the former electrical contractor was working on a system which was not complete and not credited for any license requirements. Subsequent acceptance testing would ensure all required features functioned fully as designed. Any deficiencies would have been identified and corrected prior to the system being placed in service.

However, the NRC considered the violation to have been more significant than minor, because it involved willfulness, and therefore, the NRC has classified the violation at Severity Level IV, in accordance with the Enforcement Policy. The current NRC Enforcement Policy can be found at <http://www.nrc.gov/about-nrc/regulatory/enforcement.html> on the NRC's webpage.

The NRC considered issuance of a Notice of Violation (NOV) for this issue. However, the NRC credits the identification of the issue to the licensee. As stated in the Enforcement Manual, Section 6.6.5.B, and in accordance with the Enforcement Policy, the NRC may disposition a licensee-identified Severity Level IV willful violation involving a low level individual as a Non-Cited Violation (NCV). In an effort to encourage licensees to act responsibly in the identification and correction of such violations, the NRC may choose to disposition certain violations by issuing an NCV if the licensee identified and corrected the violation.

This violation is being treated as an NCV, consistent with Section 2.3.2.a of the Enforcement Policy. The violation was entered into the licensee's corrective action program as CR-WF3-2012-0350. (NCV 05000382/2013007-01, "Willful Violation of Documentation Procedures").

A response to this letter is not required. However, if you contest this NCV or its significance, you should provide a response within 30 days of the date of this letter, 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, Region IV; the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555-0001; and the NRC Senior Resident Inspector at Waterford Steam Electric Station, Unit 3.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and your response, if you choose to provide one, will be available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and

Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response, if you choose to provide one, should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the public without redaction.

Should you have any questions regarding this letter, please feel free to contact Mr. Don Allen at (817) 200-1574.

Sincerely,

**/RA/**

Kriss M. Kennedy, Director  
Division of Reactor Projects

Docket: 50-382  
License: NPF-38

Enclosure:  
Licensee Factual Summary,  
OI Report 4-2012-021

cc w/encl: Electronic Distribution for  
Waterford Steam Electric Station, Unit 3

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ADAMS ACCESSION NUMBER: **ML13219A177**

SUNSI Rev Compl.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	ADAMS	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Reviewer Initials	DSB
Publicly Avail.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Sensitive	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Sens. Type Initials	DSB
C: DRP/PBE	ORA/ACES	OE Specialist	ORA/ACES	RC	D: DRP
DAllen	RBrowder	DFurst	HGepford	KFuller	KKennedy
/RA/	/RA/	/RA/	/RA/	/RA/	/RA/
07/29/2013	07/ 18 /2013	07/ 26 /2013	07/30/2013	08/5/2013	08/7/2013

**LICENSEE FACTUAL SUMMARY  
OFFICE OF INVESTIGATIONS REPORT 4-2012-021**

On March 19, 2012, the United States Nuclear Regulatory Commission's (NRC) Office of Investigations (OI), Region IV, initiated an investigation to determine whether a general foreman and/or an electrical superintendent employed by Shaw Stone & Webster (SSW) and worked under contract at Entergy, Waterford 3 Steam Electric Station (Waterford), willfully falsified procedure paperwork at Waterford. The investigation was completed on April 19, 2013.

Based on the evidence developed during the OI investigation, it was determined that the general foreman had the proper training and should have known that he could not sign the initials/signature of other employees, in the manner that he did. Licensee Procedure EN-MA-101, "Fundamentals of Maintenance," Revision 9, provides instructions for complying with regulatory requirements. Procedure EN-MA-01, Step 5.6[1] states, in part, that work activities are documented accurately and completely in Work Packages and Maintenance Procedures.

The evidence developed during this investigation demonstrated that the general foreman failed to adhere to procedures required to be implemented by Technical Specifications 6.8.1 and willfully falsified procedure paperwork at Waterford. In addition, the investigation concluded that the electrical superintendent did not willfully falsify procedure paperwork at Waterford.