



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION IV
1600 E. LAMAR BLVD.
ARLINGTON, TX 76011-4511

March 28, 2014

EA-13-233

Mr. Michael R. Chisum, Site Vice President
Entergy Operations, Inc.
17265 River Road
Killona, LA 70057-0751

SUBJECT: FINAL SIGNIFICANCE DETERMINATION OF WHITE FINDING AND NOTICE OF VIOLATION; NRC INSPECTION REPORT 05000382/2014009

Dear Mr. Chisum:

This letter provides you the final significance determination of the preliminary White finding discussed in our previous communication dated January 30, 2014, which included the U.S. Nuclear Regulatory Commission (NRC) Inspection Report 05000382/2013008 (ML14030A616). The finding involved the failure to establish an adequate test program to demonstrate that a safety-related component associated with the train B emergency diesel generator would perform satisfactorily in service. Specifically, the licensee failed to identify and perform adequate testing on the train B emergency diesel generator exhaust fan to demonstrate that the exhaust fan would perform satisfactorily in service. This resulted in the train B emergency diesel generator being inoperable greater than the technical specification allowed outage time.

In your letter dated February 28, 2014, you provided a response to the NRC staff's preliminary determination regarding the finding. Your response indicated your agreement that the finding has a low-to-moderate safety significance and is appropriately characterized as a White finding. After considering the information developed during the inspection and the additional information you provided in your letter dated February 28, 2014, the NRC has concluded that the finding is appropriately characterized as White, a finding of low-to-moderate risk significance.

You have 30 calendar days from the date of this letter to appeal the staff's determination of significance for the identified White finding. Such appeals will be considered to have merit only if they meet the criteria given in Inspection Manual Chapter 0609, "Significance Determination Process," Attachment 2. An appeal must be sent in writing to the Regional Administrator, Region IV, 1600 E. Lamar Blvd., Arlington, TX 76011-4511.

The NRC has also determined that the failure to establish test program requirements within procedures to assure that testing demonstrated that a safety-related component (emergency diesel generator exhaust fan) would perform satisfactorily in service is a violation of Title 10 of the *Code of Federal Regulations* (CFR) Part 50, Appendix B, Criteria XI, "Test Control," as cited in the attached Notice of Violation (Notice). The circumstances surrounding the violation were described in detail in NRC Inspection Report 05000382/2013008. In accordance with the NRC Enforcement Policy, the Notice is considered escalated enforcement action because it is associated with a White finding.

The NRC has concluded that the information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence, and the date that full compliance was achieved is already adequately addressed on the docket in your letter dated February 28, 2014. Therefore, you are not required to respond to this letter unless the description therein does not accurately reflect your corrective actions or your position.

Because plant performance at the Waterford Steam Electric Station, Unit 3, has been determined to be beyond the licensee response column of the NRC's Reactor Oversight Process Action Matrix as the result of the White significance of the subject finding, the NRC will use the Action Matrix to determine the most appropriate NRC response to the finding's significance. We will notify you, by separate correspondence, of that determination.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice and Procedure," a copy of this letter, its enclosure, and your response, if you choose to provide one, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC website at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

Sincerely,

/RA S. Reynolds Acting for/

Marc L. Dapas
Regional Administrator

Docket: 50-382
License: NPF-38

Enclosure:
Notice of Violation

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<input checked="" type="checkbox"/> Publicly Available		<input type="checkbox"/> Non-publicly Available		<input type="checkbox"/> Sensitive	<input checked="" type="checkbox"/> Non-sensitive
Category:		KEYWORD: EA-13-233			
RIV:	BC	ACES:SES	RC	D:DRP	
MBloodgood	GWerner	RBrowder	KFuller	KKennedy	
/RA/	/RA/	/RA/	/RA/	/RA/	
03/07/14	03/10/14	03/10/14	03/10/14	03/11/14	
D:DRS	NRR	OE Specialist	RA		
JClark	CSanders	LCasey	MLDapas		
/RA/	/RA/ per email	/RA/ per email	/RA SReynolds for		
03/11/14	03/24/14	03/24/14	03/27/14		

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NOTICE OF VIOLATION

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

Docket: 50-382
License: NPF-38
EA-13-233

During the U.S. Nuclear Regulatory Commission (NRC) inspection conducted on May 20, 2013, to December 19, 2013, a violation of the NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

10 CFR Part 50, Appendix B, Criterion XI, "Test Control," requires, in part, that a test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents.

Procedure OP-903-068, "Emergency Diesel Generator (EDG) and Subgroup Relay Operability Verification," is the procedure that implements the test control requirement for the emergency diesel generator and support equipment, including the exhaust fan. Procedure OP-903-068, Section 7.4.7.11.1, states, in part, to verify that the exhaust fan is operating.

Contrary to the above, prior to May 26, 2013, the licensee did not establish test program requirements within procedures to assure that testing demonstrated that a safety-related component (emergency diesel generator exhaust fan) would perform satisfactorily in service. Specifically, Procedure OP-903-068, "Emergency Diesel Generator (EDG) and Subgroup Relay Operability Verification," Section 7.4.7.11.1, did not contain requirements or acceptable limits to assure that the emergency diesel generator exhaust fan was operational and provided adequate ventilation flow to maintain room cooling necessary for the diesel generator to remain operable.

As a result, the licensee failed to identify that the train B emergency diesel generator exhaust fan could not perform its function because it disengaged from the fan motor. Consequently, the train B emergency diesel generator was determined to be inoperable for a period of 25 days, exceeding the Technical Specification 3.8.1 allowed outage time of 72 hours.

This violation is associated with a White Significance Determination Process finding.

The NRC has concluded that information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence, and the date when full compliance was achieved is already adequately addressed on the docket in your letter dated February 28, 2014, and in NRC Inspection Report 05000382/2013008 (ML14030A616). However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation," include the EA number, and send it to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001 with a copy to the

Enclosure

Regional Administrator, Region IV, 1600 E. Lamar Blvd., Arlington, TX 76011-4511, 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).

If you choose to respond, your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. Therefore, to the extent possible, the response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Dated this 28th day of March 2014.