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QA

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U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Subject: Waterford 3 SES
Docket No. 50-382
License No. NPF-38
NRC Inspection Report 92-27
Reply to Notice of Violation

Gentlemen:

In accordance with 10CFR2.201, Entergy Operations, Inc. hereby submits in Attachment 1 the response to the violation identified in Appendix A of the subject Inspection Report.

If you have any questions concerning this response, please contact C.J. Thomas at (504) 739-6531.

Very truly yours,

R.F. Burski
Director, Nuclear Safety

RFB/CJT/ssf
Attachment
cc: J.L. Milhoan, NRC Region IV
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ATTACHMENT 1

ENTERGY OPERATIONS, INC. RESPONSE TO THE VIOLATION IDENTIFIED IN APPENDIX A OF INSPECTION REPORT 92-27

Criterion XVI of Appendix B to 10 CFR Part 50 and the licensee's approved quality assurance program description, Revision 5, require that measures be established to assure that conditions adverse to quality are promptly identified and corrected.

Contrary to the above, the corrective actions taken in response to Violations 50-382/8941-02 and 50-382/9201-01 were inadequate, as evidence by the following examples, respectively:

A. On December 30, 1992, the inspector noted that technicians performing a calibration of a broad range gas monitor in accordance with Procedure MI-003-504, Revision 3, "Broad Range Gas Detection System Channel Functional Test and Calibration HVCIA5510 A or HVCIA5510 B," verified the position of the valves requiring independent verification by one individual watching the other individual manipulate the valves, in lieu of physically verifying the valve position. The corrective actions taken in response to Violation 50-382/8941-02 were inadequate in that Administrative Procedure UNT-5-010, Revision 2, "Independent Verification Program," did not contain details on how independent verification was to be performed if alternate means, described in Step 5.2.2, were not used.

B. On December 11, 1992, the inspector found that there were four errors in the document control of the control room drawings. On drawing LOU-1564-G-167, listed in the "Temporary Alteration Affected Drawing List," a temporary alteration tag number had a transcription error in its entry. Two drawings, LOU-1564-G-160 and LOU-1564-G-172, had temporary alteration tags and were listed on the "Temporary Alteration Affected Drawing List," although the temporary alterations, 92-023 and 92-007, had been restored on November 12, 1992 and March 12, 1992, respectively. Drawing LOU-1564-G-853 was listed in the "Temporary Alteration Affected Drawing List," with Alteration 92-019, although this alteration had been restored on December 1, 1992. The licensee's corrective actions taken in response to Violation 382/9201-01 were inadequate in that the list of all affected controlled drawings was not updated each time a temporary alteration was installed or removed.

RESPONSE TO VIOLATION NO. 9227-01 (Example A)

(1) Reason for the Violation

Entergy Operations, Inc. admits this violation and believes that the root cause is twofold. First, UNT-005-010 is inadequate in that it is unclear with respect to what constitutes acceptable methods of performing independent verification. Specifically, the procedure does not provide guidance on physical verification of components. Secondly, the technician performing the independent verification made an error in judgement by not physically verifying the valve position. Although this technician is very familiar with the broad range gas monitor and felt certain that the valve was in the correct position, he should have used a "hands on" method to independently verify the position of the valve.

Prior to January 22, 1990, the Maintenance Department performed independent verifications in accordance with MD-001-025, "Independent Verification Program." This procedure required that the independent verifier do more than watch the person performing the task to be verified. However, as part of the corrective actions for Violation 50-382/8941-02, MD-001-025 was deleted and the Maintenance Department was instructed to conduct independent verifications in accordance with UNT-005-010. Although this procedure was expanded to include requirements from MD-001-025, guidance similar to the requirement that the independent verifier do more than watch the person performing the task to be verified was not incorporated. If similar guidance had been incorporated into UNT-005-010, then this event may have been prevented.

(2) Corrective Steps That Have Been Taken and the Results Achieved

On December 31, 1992, the supervisor of the technicians who performed the calibration of the Broad Range Gas Detection System initiated Quality Notice QA-93-001 to document this condition adverse to quality. Additionally, the supervisor performed "hands on" independent verifications of the positions of the drain and isolation valves for Broad Range Gas Monitors A and B. These valves were found to be in their correct position.

As an interim measure, discussions were held with instrument and control technicians to accentuate this event and acceptable methods of performing independent verification.

(3) Corrective Steps Which Will Be Taken to Avoid Further Violations

UNT-005-010 will be revised to clarify how personnel performing independent verification should verify valve alignment. Furthermore, this event will be discussed at maintenance shop meetings to inform maintenance department personnel of the proper method of performing valve position independent verifications.

(4) Date When Full Compliance Will Be Achieved

Corrective action associated with Example A of Violation 9227-01 will be complete by April 30, 1993.

RESPONSE TO VIOLATION NO. 9227-01 (Example B)

(1) Reason for the Violation

Entergy Operations admits this aspect of the violation and believes that the root cause of each of the four instances cited was personnel error, largely because the required procedure was not followed. Entergy Operations does believe, however, that the corrective action for violation 50-382/9201 01 was adequate to address the specific circumstances of that violation.

Violation 50-382/9201-01 involved the failure to control changes to a drawing in that a revised drawing was posted in the control room without transferring the tags indicating that a safety-related temporary alteration (TAR) affected the drawing. In the response to that violation, Entergy Operations noted that there were no measures in place to designate those drawings affected by a TAR. As a result, personnel posting revised drawings in the control room did not know whether a particular drawing was affected by a TAR unless they actually observed the TAR sticker on the drawing that they were replacing.

The corrective action for that violation involved the development of a "Temporary Alteration Affected Drawing List." This list was intended to assist personnel posting revised drawings to the control room by serving as a running list of those drawings that were affected by a TAR at any given time. To the extent that personnel maintained the drawing list as required by Revision 9 to UNT-005-004, "Temporary Alteration Control," Entergy Operations believes that the corrective action for Violation 50-382/9201-01 was adequate to address the problem noted in that violation.

In short, while a series of personnel errors resulted in discrepancies with the control room drawings and reduced the effectiveness of the corrective action from the previous violation, Entergy Operations does not believe that this is necessarily the result of inadequate corrective action. Rather, we believe that these examples highlight other deficiencies in the TAR process which require different corrective action. The Temporary Alteration Affected Drawing List will remain part of the TAR process to address the deficiency noted in the response to Violation 50-382/9201-01.

Details of each of the four cited errors are as follows:

A. The Temporary Alteration Affected Drawing List indicated that a TAR was active against drawing LOU-1564-G-167; however the specified TAR was incorrect in that it indicated "91-011" instead of "92-011."

This error appears to be the result of inattention to detail. Specifically, the Temporary Alteration Affected Drawing List was retyped to "clean up" the list and eliminate line outs that resulted when TAR's were closed. The engineer that typed the new affected drawing list appears to have made a typographical error when he transcribed the information.

B. Drawing LOU-1564-G-160 had temporary alteration tags although TAR 92-023 had been closed on November 12, 1992. (This drawing was not listed on the Temporary Alteration Affected Drawing List and was not required to be.)

The fact that the drawing tags were not removed from LOU-1564-G-160 when TAR 92-023 was closed was the result of personnel error. In this particular example, the individual that cleared the TAR removed equipment tag 92-023-1 and signed the equipment tag list as required. However, he then proceeded to sign the drawing tag list to indicate the removal of drawing tags 92-023-1, 92-023-2, and 92-023-3 when in fact the tags had not been removed. There appears to have been some confusion caused, in part, by the fact that two of the tags had the same numbers.

It should be noted that Revision 9 to UNI-005-004 added a verification signature block to the drawing tag list to require that a second person check the removal of the drawing tags. Had revision 9 to the procedure been in effect when this TAR was written, this error may have been prevented.

C. Drawing LOU-1564-G-172 had temporary alteration tags although TAR 92-007 was closed on July 12, 1992. (This drawing was not listed on the Temporary Alteration Affected Drawing List and was not required to be.)

This example appears to be the result of personnel error. As in the last example, tag 92-007-1 was properly cleared from the affected equipment and signed for in the equipment tag list. However, the drawing tags were not removed before the TAR restoration was accepted by the Shift Supervisor. In this case, it appears that confusion may have existed over who was

actually responsible for clearing the drawing tags because there are no signatures in the "removed by" block of the drawing tag list- the tags were simply not removed as required.

D. The Temporary Alteration Affected Drawing list showed that TAR 92-019 was active against drawing LOU-1564-G-853 even though TAR 92-019 had been restored on December 1, 1992.

This example was the result of personnel error on the part of the individual who closed this TAR. The individual was familiar with the provisions of Revision 9 to UNT-005-004, including the affected drawing list, yet failed to follow the required procedure.

(2) Corrective Steps That Have Been Taken and the Results Achieved

As an interim measure until permanent corrective action can be implemented, Systems Engineering personnel will verify that the administrative requirements associated with the installation or restoration of a TAR have been satisfied before the installation or restoration is accepted for use by the Operations Department.

(3) Corrective Steps Which Will Be Taken to Avoid Further Violations

Waterford 3 will revise UNT-005-004 to further refine the administrative process by which TARS are controlled. As currently envisioned, the changes to UNT-005-004 will accomplish the following objectives:

- Establish limits on the personnel who are involved in certain administrative aspects of the TAR installation and removal process. In the current process, the craft personnel who actually install or remove the TAR are responsible for adding tags to Control Room drawings and a variety of other administrative tasks. While not inherently complex, the TAR process is used infrequently. Furthermore, because the process involves configuration control, there is little margin for error. Limiting the personnel who are authorized to handle the administrative aspects of TAR installation and removal should reduce confusion and result in a more effective process.

- Establish a checklist to provide a concise summary of the administrative requirements associated with the TAR process. This checklist will be included in each TAR package to highlight the various list updates, log entries, and drawing updates that are necessary to properly install or remove a TAR.

- Revise the TAR tag numbering scheme to ensure that every tag associated with a given TAR has a unique number. Under the current process, which includes one list for drawing tags and another list for equipment tags, individual tags may or may not have unique numbers; this has created some confusion and resulted in errors when personnel attempted to restore TAR's.

- Enhance the effectiveness of the Shift Supervisor's oversight of administrative aspects of the process. In the current process, the Shift Supervisor (SS) is responsible for certifying that the installation or restoration of a TAR is complete. While the SS can review the actual installation or removal of components in the field by reviewing the work package, there is no way to ensure that administrative requirements have been satisfied short of comparing tag and drawing lists against individual drawings. The checklist described above will provide a vehicle for this review. By reviewing the completed checklist, the SS can have reasonable assurance that a TAR installation or restoration is administratively correct.

Finally, the engineer who improperly cleared TAR 92-019 will be counselled regarding his performance and management expectations in this area.

(4) Date When Full Compliance Will Be Achieved

Corrective action associated with Example B of Violation 9227-01 will be complete by July 14, 1993.