

APPENDIX A

NOTICE OF VIOLATION

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

Docket: 50-382  
License: NPF-38

During an NRC inspection conducted on December 12, 1993, through January 29, 1994, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. Criterion III of Appendix B to 10 CFR Part 50 states, in part, that measures shall be established for the selection and review for suitability of application of materials, parts, equipment, and processes that are essential to the safety-related functions of the structures, systems and components. Criterion III further states, in part, that design control measures shall provide for verifying or checking the adequacy of design, such as by the performance of reviews, by the use of alternate or simplified calculation methods or by the performance of a suitable testing program.
1. Contrary to the above, measures were not established to verify the suitability of application of materials, parts, equipment, and installation processes for replacement of safety-related valve operators with nonsafety-related valve operators. Specifically, in 1988, Design Modification MR 1960 was implemented which provided for the installation of two safety-related valves, CC-8241A and CC-8251B, in the component cooling water system for Trains A and B, respectively. As part of the design modification, the safety-related pneumatic operators were replaced with nonsafety-related manual operators. An evaluation was not performed to determine the suitability of the operator replacements. In addition, approved work instructions were not provided for replacement of the valve operators. The valves are essential to maintaining the separation of the component cooling water system accident trains.
  2. Contrary to the above, the design process used for Design Modification MP-1960 did not require postmodification review, calculation, or testing to ensure the design adequacy in that the hydrostatic test performed would not identify the error-induced mispositioning of Valves CC-8241A and CC-8251B, which resulted in crossconnection of two accident trains of the component cooling water system.

This is a Severity Level IV violation. (Supplement I) (382/9335-01)

- B. 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.

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1. Contrary to the above, the corrective actions taken in response to Condition Identifications 265759 and 272856, initiated on October 10, 1989, and December 17, 1990, respectively, for correction of seat leakage in Valve CC-8251B (or CC-8241A) had not yet been implemented. The seat leakage resulted in a degradation of the train separation of the component cooling water system.
2. Contrary to the above, the corrective actions taken in response to Condition Identifications 251421, 266587, and 273518, completed on December 14, 1987, January 16, 1990, and April 5, 1991, respectively, were inadequate to prevent the failure of the Main Steam Drip Pot Motor-Operated Drain Valve MS-120A to close during the performance of Surveillance Procedure OP-903-094, Revision 7, "ESFAS Subgroup Relay Test - Operating," on January 2, 1994, because of interference between the valve actuator declutch lever and an adjacent support. The three condition identifications and the failure's root cause all identified interference between the declutch lever on Valve MS-120A and an adjacent support.

This is a Severity Level IV violation. (Supplement I) (382/9335-02)

Pursuant to the provisions of 10 CFR 2.201, Entergy Operations, Inc. is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, 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). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,  
this *4th* day of *March* 1994