

FEB 13 1991

Docket No. 50-382/90-22  
License No. NPF-38

Entergy Operations, Inc.  
ATTN: Ross P. Barkhurst, Vice President  
Operations, Waterford  
P.O. Box B  
Killona, Louisiana 70066

Gentlemen:

Thank you for your letter of November 21, 1990, in response to our letter and Notice of Violation dated October 23, 1990. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation; however, your position that it is not practical to test the main steam atmospheric dump valves (ADV's) while the plant is at power will require further review. We have requested guidance from NRR with regard to the intent of the ASME Code statement that "Valves shall be exercised to the position required to fulfill that function unless such operation is not practical during plant operation." We will followup on this part of your response upon receipt of the guidance from NRR.

We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,

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Samuel J. Collins, Director  
Division of Reactor Projects

cc:  
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Entergy Operations, Inc.

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Chairman  
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Entergy Operations, Inc.  
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Department of Environmental Quality  
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President, Parish Council  
St. Charles Parish  
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Entergy Operations, Inc.

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bcc to DMB (IE01)

bcc distrib. by RIV:

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# Entergy Operations

Entergy Operations, Inc.

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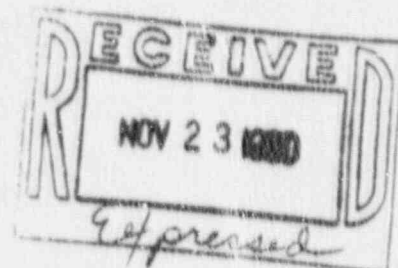
Raymond F. Burski

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QA

November 21, 1990

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 90-22  
Reply to Notice of Violation



Gentlemen:

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

If you have any questions concerning this response, please contact T.W. Gates at (504) 739-6697.

Very truly yours,

*[Signature]*  
RFB/TWG/ssf/  
Attachment

cc: Messrs. R.D. Martin, NRC Region IV  
D.L. Wigginton, NRC-NRR  
E.L. Blake  
R.B. McGehee  
NRC Resident Inspectors Office

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ATTACHMENT 1

ENTERGY OPERATIONS, INC. RESPONSE TO THE VIOLATION IDENTIFIED IN  
APPENDIX A OF INSPECTION REPORT 90-22

VIOLATION NO. 9022-02

Failure to Provide Complete and Accurate Information to the NRC

10 CFR Part 50.9(a) states, in part, that information provided to the NRC by a licensee shall be complete and accurate in all material respects.

Contrary to the above, on September 26, 1990, the NRC inspector discovered that the licensee failed to provide accurate information to the NRC in that ASME Code Section XI inservice test Relief Request 3.1.27 of the licensee's inservice test program (Revision 5) was granted by the NRC on February 7, 1989, based on an incorrect justification provided by the licensee.

This is a Severity Level IV violation.

RESPONSE

(1) Reason for the Violation

Entergy Operations, Inc. admits this violation and believes that the root cause was inadequate review of the relief requests submitted in the Waterford 3 Pump and Valve Inservice Testing (IST) Plan.

Inservice testing requirements for pumps and valves are provided by the ASME Boiler and Pressure Vessel Code, Section XI. Waterford 3 IST Relief Request 3.1.27 offered cold shutdown, full stroke testing in lieu of the ASME required quarterly operability tests. This relief request was submitted to the NRC for the two main steam atmospheric dump valves (ADV), MS-116A and MS-116B.

The basis for Relief Request 3.1.27 states that the ASME code required operability testing of the normally closed valves during power operation is not practical because stroking the valves would induce unwanted secondary and primary transients. Also, that failure of the valves in a nonconservative (open) position would force a plant shutdown. However, the basis for Relief Request 3.1.27 is misleading in that it does not reference the ADV manual isolation valve or reflect the associated ADV isolation capability. This omission resulted from the fact that the technical group responsible for the IST program did not perform an adequate technical review of this relief request prior to its issue. Without the benefit of information concerning installed isolation capability, the NRC granted IST Relief Request 3.1.27.

On September 26, 1990, the NRC was observing station maintenance activities affecting safety-related systems and components. The NRC inspector noted that MS-116A and MS-116B had an upstream isolation valve that could be shut to perform quarterly testing of the ADVs with the plant at full power. This observation occurred when the isolation valve was used to allow a full-stroke test of the ADVs following maintenance performed to correct a non-conformance condition.

In summary, the IST relief requests were not adequately reviewed. This resulted in the transmittal of incomplete information to the NRC and the subject violation.

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

Waterford 3 evaluated IST Relief Request 3.1.27 and determined that the ADVs were operable as a result of full-stroke testing done in conjunction with the maintenance work performed on September 26, 1990.

Waterford 3 currently has a procedure which establishes criteria to ensure that material statements made in correspondence with regulatory agencies are factual and accurate. This procedure was not in place when Relief Request 3.1.27 was transmitted to the NRC on September 13, 1982. Nuclear Operations Administrative Procedure NOAP-047, "Validation", provides a uniformly administered validation process, guidance to determine what regulatory correspondence and statements should be evaluated, and guidance for validation documentation.

The ASME Boiler and Pressure Vessel Code, Section XI, 1980 Edition, subsection IWV-3412(a) states that "Valves shall be exercised to the position required to fulfill their function unless such operation is not practical during plant operation. If only limited operation is practical during plant operation, the valve shall be part-stroke exercised during plant operation and full-stroke exercised during cold shutdowns. Valves that cannot be exercised during plant operation shall be specifically identified by the Owner and shall be full-stroke exercised during cold shutdowns."

The technical group responsible for the IST program determined that isolation of the ADV's for quarterly operational testing could limit their usefulness in controlling plant pressure during some accident scenarios. Quarterly testing does not result in a measurable increase in operational confidence, and does not warrant the attendant risk incurred when the ADV is removed from service. Therefore, the current scope of testing for the ADVs is in accordance with the ASME cold shutdown requirements. IST Relief Request 3.1.27 will be deleted from the IST Plan per Section (3) below.

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

As additional corrective action, a review of all the IST relief requests will be conducted. Any changes as a result of this review will be included as part of the next submittal (Revision 7) of the Waterford 3 Pump and Valve IST Plan. Additionally, Relief Request 3.1.27 will be deleted in Revision 7 of the IST plan. Prior to submittal to the NRC, the Pump and Valve IST plan will be validated in accordance with NOAP-047, "Validation".

(4) Date When Full Compliance Will Be Achieved

The technical review of the IST Plan relief requests shall be completed by February 28, 1991 at which time Entergy Operations, Inc. will be in full compliance.

VIOLATION NO: 9022-03

Failure to Follow Procedure

10 CFR Part 50, Appendix B, Criterion V requires, in part, that activities affecting quality shall be accomplished in accordance with approved procedures.

The Waterford 3 Nuclear Operations Management Manual, Section V, Chapter 5, Revision 4, implements the above criterion.

Nuclear Operations Construction Procedure NOCP-207, Revision 3, "Erecting Scaffold," Section 5.1.13, requires an engineering evaluation of scaffold installations prior to erection when they need to be attached to equipment or supports/hangers.

Contrary to the criteria above, on September 4, 1990, an engineering evaluation of a scaffolding installation, attached to equipment, was not performed prior to its construction. A scaffold was found attached to the handrail on a cylinder access platform which in turn was attached to the A emergency diesel generator (EDG) without the prerequisite engineering evaluation to determine the impact on EDG operability.

This is a Severity Level IV violation.

RESPONSE

(1) Reason for the Violation

Entergy Operations, Inc. admits this violation and believes that the root cause can be attributed to a combination of necessarily general procedural guidance and human error.

The procedure in question, NOCP-207 "Erecting Scaffold", describes requirements with regard to scaffold construction and includes a series of attachments that, in total, form a "decision-tree" for evaluating the impact of a given scaffold installation. The guidance is necessarily of a general nature. The Construction Supervisor or his designee is assigned responsibility for identifying, prior to construction, if the scaffold will be attached to equipment and if so, ensuring that the necessary engineering evaluation is completed.

The human error aspect of the cited violation arises because the personnel reviewing the scaffold request did not recognize the unique configuration of the handrail installation and its relationship to the emergency diesel generator. Their evaluation of the handrail as not "attached to equipment or supports/hangers" and the failure to submit the scaffold request for engineering review as required by procedure can be substantially attributed to the uncommon component arrangement.



In summary then, the necessarily general nature of the scaffold procedure could not compensate for this rare instance when the characteristics of the installed component arrangement that necessitated further evaluation were less than obvious. This led to a faulty estimation of the need for a design review and thus the implications of attaching the scaffolding to the handrail on the cylinder access platform and by extension, the emergency diesel generator, were not recognized.

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

Prompt and extensive corrective actions have been taken to achieve compliance and to preclude recurrence of a similar event. Corrective actions taken to this point include the immediate dismantling of the subject scaffolding, issuance of a revision to the scaffold procedure, and a review of the violation with current scaffolding crews.

The revision to NOCP-207 is an attempt to ensure that a similar oversight will not occur in the future. Within the parameters of the current instruction, it imposes requirements and guidance to ensure that a situation of this nature will not be overlooked in the future. In general, it expands the scope of scaffolding projects for which an engineering review might be required and highlights the concerns associated with anchoring scaffolding to components which, while not in themselves worthy of an engineering evaluation, could conceivably impact the performance and availability of other equipment.

The procedure revision also specifically prohibits attaching scaffolding to the diesel generator, the diesel generator skid, or the diesel generator handrail without prior engineering review and approval. It also inserts a hold point in the scaffold request form which will ensure that any required reviews have been completed before the scaffold is built.

The scaffolding in question was removed immediately when the question of procedural compliance was raised. Finally, all of the current scaffolding crews and construction supervisors have been made aware of the details of this violation and sensitized to the need for careful analysis of component arrangements to ensure that safety features are not inadvertently negated by scaffolding.

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

In order to reinforce the importance of carefully considering the impact of scaffolding on equipment operation, the lessons learned from this violation will be incorporated into the scaffolding training program. The upgraded training will highlight the need for careful and complete analysis of component arrangements such that future scaffolding installations will be suitably anchored and not inadvertently impact equipment operation.

Additionally, a systematic evaluation of the engineering review process will be performed to determine the viability of potential modifications to positively address this particular situation. While no procedure can fully address every potential component arrangement, a fundamentally different approach to the question of engineering reviews might provide additional assurance that a similar situation will not be overlooked.

(4) Date When Full Compliance Will Be Achieved

Entergy Operations, Inc. will formally incorporate the lessons learned from this violation into the scaffolding training program by January 1, 1991.

The evaluation of the engineering review process will be complete by July 1, 1991 at which time Waterford 3 will be in full compliance.