



ENTERGY

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Director
Nuclear Safety
Waterford 3

W3F1-94-0073

A4.05

PR

May 26, 1994

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 94-07
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.

Additionally, your inspection report identified a weakness regarding the failure to incorporate, or at least flag the existence of, service bulletins into applicable sections of the Cooper Industries Diesel Generator Technical Manual 457001225. It should be noted that Entergy Operations, Inc. acknowledges this weakness and has taken steps to assure that it is thoroughly evaluated. Specifically, the Operational Experience Engineering (OEE) Department will consider the weakness when they assess the Vendor Equipment Technical Information Program later this year. Any recommendations identified by OEE will be evaluated and implemented as appropriate.

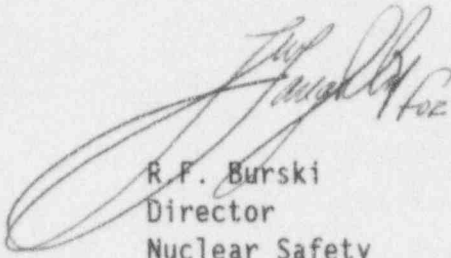
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NRC Inspection Report 94-07
Reply to Notice of Violation
W3F1-94-0073
Page 2
May 26, 1994

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/tjs
Attachment

cc: L.J. Callan, NRC Region IV
D.L. Wigginton, NRC-NRR
R.B. McGehee
N.S. Reynolds
NRC Resident Inspectors Office (WADM526)

ATTACHMENT 1

ENERGY OPERATIONS, INC. RESPONSE TO THE VIOLATION IDENTIFIED IN
APPENDIX A OF INSPECTION REPORT 94-07

VIOLATION NO. 9407-01

Technical Specification 6.8.1.a requires, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Appendix A, states, in part, that maintenance that can affect the performance of safety-related equipment should be performed in accordance with written procedures appropriate to the circumstances.

Contrary to the above, on March 25, 1994, Mechanical Maintenance Procedure MM-003-041, "Five Year Emergency Diesel Generator Inspection," Revision 0, Section 8.9, was not appropriate to the circumstances, in that it did not provide instructions to clean and lubricate the fuel injector pump mounting fasteners in accordance with specifications provided in Cooper Industries Diesel Generator Technical Manual 457001225.

RESPONSE

(1) Reason for the Violation

Energy Operations, Inc. admits this violation and believes that the root cause was inappropriate action in that personnel responsible for the initiation and review of MM-003-041 failed to comply with Administrative Procedure MD-001-028, "Writer's Guide for Maintenance Department Procedures." MD-001-028 requires individuals who initiate and review new plant procedures to make every effort to ensure that the procedures are technically accurate and complete. Relevant information must be thoroughly reviewed to produce and maintain consistently high quality, dependable procedures. Energy Operations, Inc. believes that this event may have been prevented had a thorough review of Cooper Industries Diesel Generator Technical Manual 457001225 been performed. It should be noted that Technical Manual 457001225 and Standard SD-123 are listed in the reference section of MM-003-041.

Cooper Industries Diesel Generator Technical Manual 457001225 includes a copy of Cooper Service Bulletin 710. This service bulletin directs the reader to Standard SD-123 which is also included in the technical manual. Collectively, these specifications require that fuel injection pump mounting fasteners be cleaned and lubricated with petroleum type lubricants (Lubriplate 630 series is recommended) and that the running torque of fasteners with nylon or deformed thread locking features be added to the specified torque.

Cooper Service Bulletin 710 and others were received by the diesel generator system engineer on April 2, 1991. The engineer reviewed and processed the service bulletins in accordance with Administrative Procedure UNT-004-035, Revision 2, "Control of Vendor Information." As part of that review, the engineer noted that Mechanical Maintenance Procedure MM-003-015, "18 Month Emergency Diesel Engine Inspection," was impacted by the service bulletins and that Mechanical Maintenance (MM) should review the procedure for updates. Additionally, the engineer requested that the service bulletins be placed in Section 19A of Technical Manual 457001225. Section 19A had been designated as the section to store Cooper service bulletins for future reference.

At the time Cooper Service Bulletin 710 was received, MM-003-015 was the only MM procedure to provide instructions for inspecting the diesel engine. Additionally, the procedure did not include instructions for removing and installing fuel injection pumps. Consequently, when MM reviewed the procedure against Cooper Service Bulletin 710 they did not update the procedure to incorporate the revised torquing instructions for the fuel injection pump mounting fasteners.

On February 6, 1992, and August 29, 1992, MM implemented two new diesel engine inspection procedures -- MM-003-042, "Ten Year Emergency Diesel Engine Inspection," and MM-003-041, "Five Year Emergency Diesel Engine Inspection." Both procedures incorporated instructions for removing, calibrating and installing fuel injection pumps that were consistent with the applicable section of Technical Manual 457001225. However, both procedures failed to provide instructions to clean and lubricate the fuel injection pump mounting fasteners in accordance with specifications provided by Cooper Service Bulletin 710 and Standard SD-123. Entergy Operations, Inc. believes that had MM personnel thoroughly reviewed Technical Manual 457001225 against MM-003-042 and MM-003-041 this event may have been prevented.

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

The diesel system engineer issued Condition Report CR-94-265 on the same day the NRC communicated their concerns over whether the diesel generators could be considered operable with questionable prestress on the fuel injection pump mounting fasteners. Additionally, the engineer contacted Cooper Industries for an evaluation. Cooper Industries stated that the installation was acceptable, as long as the fasteners were not cleaned (which they were not), because the residual lubricant and fuel oil would have ensured acceptable prestress. Also, the torque specified by the applicable drawing in Technical Manual 457001225 took into account the additional torque needed to compensate for the locking feature running torque. This position is supported by the fact that there have been no failures of fuel injection pump mounting fasteners on the diesel generators.

The fuel injection pump mounting fasteners on Emergency Diesel Generator 'A' disassembled during the Refuel 6 Outage were reassembled using Lubriplate 630-AA.

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

Four corrective steps will be taken to avoid further violations:

1. The MM personnel involved with the initiation and technical review of MM-003-041 and MM-003-042 will be counseled per the Improving Human Performance Program.
2. MM-003-041 and MM-003-042 will be revised to provide instructions to clean and lubricate the fuel injection pump mounting fasteners in accordance with the specifications provided in Technical Manual 457001225.
3. Cooper Industries Drawing KSV-18-4, "Fuel Injection Pump," will be annotated to require that fuel injection pump mounting fasteners be lubricated with Lubriplate 630-AA or equivalent.
4. This event will be discussed with Maintenance and Engineering Support Personnel as part of the Continuing Training Program.

(4) Date When Full Compliance Will Be Achieved

Corrective steps 1 through 3 will be completed by July 29, 1994.
Corrective step 4 will be completed by December 30, 1994.