

APPENDIX

U.S. NUCLEAR REGULATORY COMMISSION  
REGION IV

NRC Inspection Report: 50-382/91-02

Operating License: NPF-38

Docket: 50-382

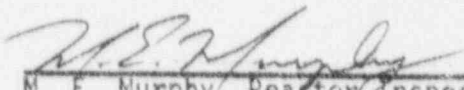
Licensee: Entergy Operations, Inc.  
P.O. Box B  
Killona, Louisiana 70066

Facility Name: Waterford Steam Electric Station, Unit 3 (WAT-3)

Inspection At: WAT-3 Site, Taft, Louisiana


Inspection Conducted: February 25 through March 1, 1991

Inspector:

  
M. E. Murphy, Reactor Inspector, Test Programs  
Section, Division of Reactor Safety

3/7/91  
Date

Approved:

  
W. C. Seidle, Chief, Test Programs Section  
Division of Reactor Safety

3/7/91  
Date

Inspection Summary

Inspection Conducted February 25 through March 1, 1991 (Report 50-382/91-02)

Areas Inspected: Routine, unannounced inspection of the fire protection/prevention program, followup on previous inspection findings, and followup on a licensee event report.

Results: The licensee has established a strong fire protection/prevention program with good administrative controls and leadership. The licensee's aggressive review and resolution of the fire barrier penetration problems indicated continued management attention to the fire protection/prevention program. The review of licensee actions on previous inspection findings resulted in the closure of one violation and one inspector followup item. One licensee event report was closed. There were no violations or deviations identified during this inspection.

DETAILS

1. PERSONS CONTACTED

- \*B. Abukhader, Design Engineering
- \*D. Baker, Director, Operating Support Assessments
- \*G. Davis, Manager, Event Analysis Reporting and Response
- \*T. Gaudet, Operational Licensing Supervisor
- \*J. Hoffpauir, Maintenance Superintendent
- \*A. Holder, Supervisor, Fire Protection and Safety
- \*W. LaBonte, Radiation Protection Superintendent
- \*J. McGaha, General Manager, Plant Operations
- J. O'Hern, Operations Training Supervisor
- \*O. Pipkins, License Engineer, Licensing
- \*R. Pollock, Quality Assurance Operations Supervisor

The inspector also interviewed other licensee personnel during the inspection.

\*Denotes those attending the exit meeting on March 1, 1991.

2. FOLLOWUP OF PREVIOUS INSPECTION FINDINGS (92702)

(CLOSED) Inspector Followup Item (382/8912-04): This item was opened to followup on the corrective actions taken as a result of the licensee declaring 75 fire dampers inoperable. These inoperable fire dampers were identified during a 100 percent inspection by the licensee, of fire seals, which revealed that the fire dampers were not installed in accordance with the manufacturer's requirements and fire test configurations.

The licensee has completed the engineering evaluations on the fire dampers. Rework requirements have been incorporated into Design Change 3197. The results of the inspection and the engineering evaluations have been incorporated in Licensee Event Report (LER) 88-0030 as Revision 2, issued July 14, 1989.

This Inspector Followup Item is closed.

(CLOSED) Violation (382/9014-01): This violation involved a failure to comply with Technical Specification requirements while performing the local leak rate tests (LLRT) for containment penetrations. Upon identification of the deficiency, the licensee conducted a review of LLRT activities during the last three refueling outages. Subsequent to this review, the licensee applied a correction factor for each leakage rate where it was identified that a test had been conducted at less than the required test pressure. Although this resulted in increased leak rates, there was no instance of unacceptable individual or combined leakage rates.

The licensee issued Change 1 to Revision 3 of Procedure OP-903-114, "Local Leak Rate Test (LLRT)" on September 7, 1990. This change incorporated precautions and limitations stating the minimum allowable test pressure, in accordance with the Technical Specifications.

This violation is closed.

3. ONSITE LER FOLLOWUP (92700)

The following LER was selected for onsite followup inspection to determine that the licensee had taken the corrective actions as stated in the LER and if the response to the event was adequate and met regulatory requirements, licensee conditions, and commitments.

(CLOSED) LER 382/88-030, "Fire Barrier Discrepancies Dating From Initial Plant Construction"

This LER, including Revisions 1 and 2, detailed the fire barrier penetration discrepancies discovered during surveillance testing. The extent of the discrepancies caused the licensee to expand the inspection to 100 percent. The licensee's inspection has been completed. Engineering evaluations have identified the required rework and Design Change 4197 has been issued. The extensive work required will take considerable time and the licensee has developed a tentative schedule. Because some work items can only be accomplished during an outage, the licensee has not predicted a completion date. Compensatory measures will remain in effect until the barrier penetrations are declared operable.

This LER is closed.

4. FIRE PROTECTION/PREVENTION PROGRAM (64704)

This inspection was conducted to evaluate the overall adequacy of the licensee's fire protection program and to determine whether the licensee was implementing the program in conformance with regulatory requirements, the approved fire protection program, and industry guides and standards.

The inspector reviewed the following administrative procedures that comprise the licensee's fire protection program:

<u>PROCEDURE NO.</u>	<u>TITLE</u>	<u>DATE</u>
UNT-005-013	Fire Protection Program, Revision 2	January 8, 1991
FP-001-014	Duties of a Fire Watch, Revision 5	May 26, 1989
FP-001-015	Fire Protection System Impairments, Revision 7	October 21, 1990
FP-001-016	Hot Work Activities, Revision 7	September 23, 1989
FP-001-017	Transient Combustibles and Designated Storage Areas, Revision 7	December 17, 1990
FP-001-018	Pre-Fire Strategies, Revision 4	June 12, 1989
FP-001-019	Fire Brigade Equipment, Revision 3	February 26, 1987
FP-001-020	Fire Emergency/Fire Report, Revision 6	February 14, 1991

This review verified that the licensee had technically adequate procedures to implement the fire protection program. Procedural guidance was provided to control combustible material and reduce fire hazards. Administrative procedures also provided for maintenance and surveillances of fire suppression, detection, and support equipment. Personnel training, qualifications, and responsibilities were adequately provided. Maintenance evolutions, which significantly increase fire risk, were properly controlled.

The inspector toured accessible areas of the yard, auxiliary building, and reactor building to inspect the general area condition, work activities in progress, and visual condition of fire protection systems and equipment. Combustible materials and flammable and combustible liquid and gas usage were restricted or properly controlled in areas containing safety-related equipment and components. Items checked included positions of selected valves, fire barrier conditions, hose stations, hose houses, fire lockers, and fire extinguishers for type, location, and condition.

There was no welding, cutting, or use of open flame ignition sources found in the areas toured. Access to hose houses, hose stations and fire extinguishers was not impaired. There was no construction activity noted in any of the toured areas. General housekeeping conditions were found to be very good. Fire brigade equipment, including emergency breathing apparatus, was found to be properly stored and maintained. Fire protection systems and equipment installed for protection of safety-related areas were found to be functional and tested in accordance with the requirements specified in the fire protection program.

The inspector also reviewed fire brigade training and drill records. The records were in order and confirmed that training and drills were being conducted at the specified intervals.

The last triennial and annual QA audits in the area of fire protection, SA-89-016.1 dated March 6, 1990, and SA-90-16.1 dated January 16, 1991, were reviewed by the inspector. The audits were comprehensive and addressed system and equipment alterations, tests, surveillances, maintenance, records, and overall program procedures. Discrepancies identified were formally presented to the affected organization. Responses were tracked to closeout, and actions taken were reviewed for adequacy.

There were no violations and deviations identified in this area of the inspection.

#### 5. EXIT MEETING

An exit meeting was conducted on March 1, 1991, with those personnel denoted in paragraph 1 of this report. At this meeting, the scope of the inspection and the findings were summarized. The licensee did not identify as proprietary any of the information provided to, or reviewed by the inspector.