

APPENDIX A

NOTICE OF VIOLATION

Entergy Operations, Inc.  
Waterford 3 Steam Electric Station

Docket: 50-382  
License: NPF-38

During an NRC inspection conducted February 28 through March 4, March 14-18 and 28-29, 1994, one violation of NRC requirements was 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:

Licensee Contracts W-1033-0002 and W-1033-0006, which are applicable, respectively, to Refueling Outage RF5 (1992) and Refueling Outage RF6 (1994) eddy current examination services, require the supplier (i.e. Conam) to maintain and comply with a quality assurance program that complies with Appendix B to 10 CFR 50.

Criterion V of 10 CFR 50, Appendix B, states, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

Paragraph 8.3.1 in Conam Procedure 42-EC-227, "Multifrequency Eddy Current Procedure Steam Generator Tubing Digital Eddy Current System Waterford 3," Revision 1, states, in part, "When a remote fixture is used, positive visual tube identification will be made by the lead operator, shift supervisor, or job supervisor. Verification will be made on the peripheral tube in each column. The use of known landmarks, such as plugged tubes and tube sheet maps may be used to aid in the verification."

Contrary to the above:

1. Installation and operation of Zetec SM-22 robotic fixtures, which were used during Refueling Outage RF6 in 1994 to position eddy current probes on the face of the steam generator tube sheet, were not prescribed by documented instructions, procedures, or drawings.
2. Positive visual tube identification was not consistently performed during Refueling Outage RF5 in 1992, as evidenced by the discovery during the following outage that incorrect tube locations had been identified in 1992 for 21 tubes that were examined by the bobbin coil method. Verification was primarily performed using landmarks, with only a limited number of peripheral tubes in columns being subject to verification.

This is a Severity Level IV violation (Supplement I) (382/9406-01).

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 *6<sup>th</sup>* day of *May* 1994