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W3F1-91-0015
A4.05
QA

April 3, 1991

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 91-03
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.

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

Very truly yours,

RFB/TWG/ssf
Attachment

cc: Messrs. R.D. Martin, NRC Region IV
D.L. Wigginton, NRC-NRR
E.L. Blake
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ATTACHMENT 1

ENTERGY OPERATIONS, INC. RESPONSE TO THE NOTICE OF VIOLATION
IDENTIFIED IN APPENDIX A OF INSPECTION REPORT 91-03

Violation No. 9103-03

Failure to Properly Review and Approve a Retest

Technical Specification (TS) 6.8.1.c requires, in part, that written procedures shall be established, implemented, and maintained covering test activities of safety-related equipment.

TS 6.5.1.6.a requires, in part, that all procedures required by TS 6.8 shall be reviewed by the plant operations review committee (PORC).

TS 6.5.1.7 requires, in part, the PORC to recommend, in writing to the General Manager - Plant Operations, approval of the above procedures prior to implementation.

Section 5.6.1.3 of Administrative Procedure UNT-007-028, Revision 0, "Design Change Initiation and Review," states that acceptance tests which affect safety-related equipment, regardless of format, shall be reviewed by the PORC and approved by the General Manager - Plant Operations.

Contrary to the above, on January 15, 1991, part of the acceptance testing of a new type digital voltmeter installed in the Channel A plant protection system bistable control panel was not reviewed by the PORC or approved by the General Manager.

This is a Severity Level IV violation. (382/9103-03)

Response

(1) Reason for the Violation

Entergy Operations, Inc. admits this violation and believes the root cause to be inappropriate action by the cognizant System Engineer in that he failed to comply with the relevant portions of UNT-007-028, "Design Change Initiation and Review," Revision 0, Change 2. Several causal factors have also been identified.

In accordance with procedure NOP-014, the System Engineer and the Lead Design Engineer for Design Change Package (DCP) 3276, "Digital Voltmeter Replacement," reviewed the scope of the planned work and agreed on the acceptance test criteria for the package. In this case, the necessary acceptance testing was relatively straightforward so it was decided to include the instructions for the acceptance test in the DCP itself. This decision meant that a separate document solely to address the acceptance test was not needed.

According to UNT-007-028, acceptance tests which affect safety-related equipment require a 10CFR50.59 screening and a PORC review. Both requirements were satisfied, at least initially. The Design Change Summary (DCS) associated with DCP 3276, including a description of the acceptance test, received a 10CFR50.59 screening and was reviewed by the Plant Operations Review Committee (PORC).

It should be noted though that this process, while fully in accordance with procedure, was not typical- acceptance testing is usually incorporated in a separate document which receives a safety screening and PORC review independent of the DCS.

At this point, several actions were taken which distorted the acceptance test approval process and ultimately resulted in the use of a non-approved acceptance test.

Briefly, after the DCS was approved by PORC, two changes were made to the DCP that altered the acceptance test. The DCS was not updated as required and did not receive another safety screening or PORC review.

These circumstances also reveal three causal factors:

First, the System Engineer assumed that any changes to the DCP automatically necessitated a revision to the DCS and subsequent PORC approval. As it turns out, this assumption was incorrect because only some- not all- changes to a DCP require that the DCS be updated. Thus the first causal factor is the decision to use the DCS as a vehicle for the approval of the acceptance test rather than following the usual practice of producing a "stand alone" document.

The second causal factor arises from the fact that inappropriate personnel made changes to the acceptance test without involving the System Engineer. Although the System Engineer did become aware of the changes before testing was performed and did not initiate the proper reviews, the practice of not involving the responsible party in a change clearly eliminates a needed vehicle for identifying potential errors. The second causal factor then, is that the System Engineer lost control of the acceptance testing.

The third causal factor is related to an earlier problem with DCP 3300, as discussed in NRC Inspection Report 90-15. At that time, UNT-007-028 did not clearly identify conditions under which post-modification tests require PORC review and a safety screening. As a result, Change 2 to Revision 0 to UNT-007-028 was approved on October 30, 1990 to implement the appropriate reviews.

However, the corrective actions from that previous example were not fully effective in preventing recurrence because Design Engineering and Maintenance personnel were not fully informed of the lessons learned from that event and were not generally aware of the recent changes to UNT-007-028. Had these personnel been aware of this recent event and the resulting procedure changes, they may have been able to prevent its recurrence.

The third causal factor then, is failure to train personnel on the root cause and corrective action associated with the earlier failure to obtain approval for the DCP 3300 acceptance test.

Nevertheless, the primary responsibility for the proper development and implementation of acceptance testing lies with the System Engineer. Since the System Engineer is responsible for developing the acceptance test, including verifying that proper reviews are performed, he should have verified that the final version of the test had received all of the necessary approvals prior to commencing the test. Since this was not done, the root cause of this event is inappropriate action by the System Engineer.

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

This event primarily results from the improper interpretation of a procedure by a single individual. In this particular instance, the responsible System Engineer has received verbal clarification on the constraints of UNT-007-028 as well as clarification on the proper course of action to be taken if a questionable situation arises again. The responsible person now fully understands the requirements of safety-related acceptance testing as outlined in UNT-007-028.

Secondly, after the acceptance test was complete, PORC reviewed the retest for DCP 3276 and recommended it for approval. The retest was approved by the General Manager - Plant Operations after consideration of PORC's recommendation.

Third, a Quality Notice (QN) has been written against Design Engineering because of the revision to the DCP without the requisite revision of the DCS. Corrective action to address this causal factor will be addressed in Design Engineering's response to this QN.

Finally, UNT-007-028 has been revised and issued. The new revision not only incorporates the previous changes but amends several statements, including those pertaining to acceptance testing, which should further clarify the acceptance testing responsibilities of the System Engineers.

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

Two corrective actions are planned:

First, the scope of the briefings initially conducted in response to Violation 9015-03 will be expanded both in content and scope. Maintenance, Operations, Design Engineering, and Systems Engineering personnel will be briefed on the requirements of UNT-007-028, including a specific discussion of both failures to obtain proper approval for the DCP 3276 and 3300 acceptance tests.

Second, Administrative Procedure UNT-005-020, "Post-Maintenance Testing," implemented in November 1990, will be evaluated to determine whether an additional discussion should be included to more clearly differentiate between the requirements for post-maintenance testing and acceptance testing. It is suspected that the subtle differences between the two types of retests are an element of confusion.

(4) Date When Full Compliance Will be Achieved

Briefings for plant staff personnel and the evaluation of UNT-005-020 will be complete by May 15, 1991.