

APPENDIX A

NOTICE OF VIOLATION

Entergy Operations, Inc.
Waterford Steam Electric Station, Unit 3

Docket: 50-382
Operating License: NPF-38

During the Nuclear Regulatory Commission (NRC) inspection conducted from December 4, 1990, through February 1, 1991, at the Waterford Steam Electric Station, Unit 3, violations of NRC requirements were identified. The violations involved a failure to verify or to check the adequacy of design and the failure to establish, follow, and maintain procedures appropriate to the circumstances. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Action," 10 CFR Part 2, Appendix C (1990), the violations are listed below:

1. FAILURE TO VERIFY OR TO CHECK THE ADEQUACY OF DESIGN

Criterion III of Appendix B to 10 CFR Part 50, requires that design control measures be established for verifying or checking the adequacy of design, and for assuring that applicable regulatory requirements and the design basis are correctly translated into specifications, drawings, procedures, and instructions.

Contrary to the above, the following are examples whereby the licensee's established measures failed to verify or to check the adequacy of design.

- a. Degraded grid (undervoltage) relay setpoint calculations did not analyze for the potential of undervoltage conditions on Class 1E loads at all onsite electrical system distribution levels. Consequently, the existing 4.16kV ac undervoltage protective relays were set at a trip setpoint which would have resulted in inoperable downstream 120V ac safety-related equipment should an untripped degraded voltage condition exist.
- b. Design Change Package DCP-3080, which changed loads to Power Distribution Panel PDP 390SA, "Static Uninterruptible Power Supply (SUPS) 3A-S," failed to verify or to check Design Calculation EE-7-39-02, "Load Study for PDP-390SA," Revision 3, during the modification change process in 1989. As a result, calculation errors and nonconservative assumptions were not addressed (e.g., failure to consider an appropriate power factor and load factor for 120 volt ac loads).
- c. The function of the protective shutdown circuits associated with safety-related inverters SUPS 3A-S and SUPS 3B-S was not adequately considered in verifying design considerations. As such, the potential existed for the safety inverters to shutdown prematurely when the associated batteries reached a minimum operating voltage band.

This is a Severity Level IV violation. (382/9023-01)(Supplement I)

2. FAILURE TO ESTABLISH, FOLLOW, AND MAINTAIN PROCEDURES APPROPRIATE TO THE CIRCUMSTANCES

Technical Specification 6.8.1 requires, ". . . written procedures be established, implemented, and maintained" covering a list of activities including the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, November 1972. Appendix A to Regulatory Guide 1.33, November 1972, listed typical safety-related activities such as the calibration, testing, and adjustment of equipment that provide interlock permissive or prohibit functions.

Contrary to the above, the licensee failed to establish procedures appropriate for calibration of critical safety-related equipment and/or failed to maintain certain safety-related procedures. The following examples apply:

- a. Surveillance Procedure ME-003-319, "GE Undervoltage Relay Mod ' 12NGV13B," Revision 4, directed setting the relays' setpoints at the Technical Specification value without adequate consideration of tolerances or potential drift. Furthermore, the procedure did not provide adequate guidance for engineering review responsibilities should the relays be found outside the acceptance band.
- b. Surveillance Procedures ME-004-131 and ME-003-327, "4.16kV GE Magne-Blast Breakers," did not incorporate applicable maintenance checks for the tertiary contacts as specified in the vendor's maintenance manual.
- c. The licensee had failed to establish appropriate procedures for a formalized fuse control program to ensure configuration management as related to fuses used in safety-related applications. Recent fusing problems experienced in the Process Analog Cabinet OP26 indicated that the licensee could not establish that the existing configuration was identical or equivalent to the initial plant licensing configuration.
- d. Maintenance Procedures ME-004-175, "Uninterruptible Power Supply 3A-S and 3B-S," Revision 3, and ME-004-172, "Static Uninterruptible Power Supplies 3MA-S, 3MB-S, 3MC-S, and 3MD-S," Revision 4, did not incorporate testing requirements specified in the applicable vendor technical manuals.
- e. Procedure UNT-001-003, "Procedure Initiation, Review and Approval; Change and Revision; and Deletion," Revision 13, required a biennial review of plant procedures. During the inspection, Procedure OP-6-001, "Operating Procedure Plant Distribution (7kV, 4kV and safe shutdown) Systems" was found to be beyond the required 2-year review requirement.

Specifically, the procedure review period was from 1988 through 1990 with a late date of October 28, 1990.

This is a Severity Level IV violation. (382/9023-02)(Supplement I)

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, and if applicable, a copy to the NRC Resident Inspector, within 30 days of the date of the letter transmitting this Notice of Violation. 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 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, considerations will be given to extending the response time. Under the authority of Section 182 of the Act, U.S.C. 2232, this response shall be submitted under oath or affirmation.

Dated at Arlington, Texas
this 27 day of April, 1991