ENTERGY

Entergy Operations, Inc.
P.O. Box B
Killona, LA 70066
Tel 504 739 6774

R. F. Burski
Director
Nuclear Safety
Waterford 3

W3F1-91-0452
A4.05
QA

August 5, 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 91-19
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,

RF Burski

RFB/TWG/ssf
Attachment
cc: R.D. Martin, NRC Region IV
D.L. Wigginton, NRC-NRR
R.B. McGehee
N.S. Reynolds
NRC Resident Inspectors Office

IE01

ATTACHMENT 1

ENTERGY OPERATIONS, INC. RESPONSE TO THE VIOLATION IDENTIFIED IN APPENDIX A OF INSPECTION REPORT 91-19

VIOLATION NO. 9119-01

Criterion XVI of Appendix B to 10 CFR Part 50 states, in part, "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition..."

Nonconformance report, "NCR Repair Work Authorization 01071639 on MSIV #1 and #2 Stem Corrosion," identified a significant condition adverse to quality (i.e., main steam isolation valve (MSIV) stem corrosion resulting from hydrolysis of leaking hydraulic fluid) and required that, if evidence of hydraulic fluid leakage was found, the fluid must be diverted away from the valve stem to prevent pooling in the packing gland area.

Contrary to the above, the inspector determined on June 6, 1991, that hydraulic fluid leakage was occurring in the MSIVs without measures having been established to provide for either prompt identification of leakage or to preclude MSIV stem corrosion. Specifically, a program had not been established to provide for routine inspection of the MSIVs to detect hydraulic fluid leaks, and no actions had been taken to divert leaking fluid away from the MSIV stem to prevent pooling in the packing gland area.

RESPONSE

(1) Reason for the Violation

Entergy Operations, Inc. admits this violation and believes that the root cause of the failure to implement corrective action was improper work control resulting from the selection of an inadequate method of initiating and tracking the necessary valve inspections. In the absence of available procedural control, the mechanism selected was not sufficient to ensure that required inspections were conducted as necessary.

In this particular instance, personnel involved opted not to generate a Condition Identification/Work Authorization (CI/WA) or a Repetitive Task but rather to initiate and control the required inspections by means of a "department instruction" and entries in a shift log book maintained by the Mechanical Maintenance Department.

In light of their importance, supervisory personnel should have written a CI/WA or a Repetitive Task to initiate the inspections. This would have put the process in "automatic" to a certain extent with a proceduralized system in place to prompt timely corrective action.

Furthermore, the types of work that can be performed without a CI/WA are intentionally limited by Administrative Procedures UNT-005-002, "Condition Identification," and UNT-005-015, "Work Authorization Preparation and Implementation," to those evolutions which have no impact on plant operations or are inherently straightforward. In this instance, personnel intended to use an allowed exception to monitor the MSIVs for hydraulic fluid leakage.

Although the actuators were not leaking when this decision was made, it is clear in retrospect that more control over the inspections was necessary. According to the original engineering evaluation, undetected hydraulic fluid leakage had potential implications for the continued satisfactory operation of an important plant component. By extension then, the inspections themselves were important enough so that formal means should have been established to track their progress.

In summary then, the decision to use a comparatively less formal means of initiating and tracking the required valve inspections was improper in light of the importance of the inspections. Ultimately, the necessary inspections were not started as required, hydraulic fluid leakage was not noticed when it began, and corrective action to keep the leaking fluid from collecting in the packing gland area was not initiated.

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

Design Engineering issued a revised evaluation of the significance of Fyrquel (hydraulic fluid) leakage and the potential for additional MSIV stem corrosion on June 7, 1991. The evaluation recommends that, while the integrity of the MSIV stems is assured through the current operating cycle, Fyrquel accumulation in the packing gland area of the valve stems be minimized. In accordance with that recommendation, the hydraulic fluid leakage rate is being qualitatively monitored on a daily basis by means of Condition Identification 276942 and Work Authorization 01081940. In conjunction with that daily check, any visible hydraulic fluid leakage is being wiped down.

In addition, Station Modification Request (SMR) MS-020, "Main Steam Isolation Valve Operator Stem Leakage Correction," has been submitted. The SMR requests that Design Engineering evaluate the actuator design and identify a long term solution to preclude the recurrence of hydraulic fluid leakage.

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

Three procedures- Engineering Procedure PE-002-005, "Engineering Work Authorization Processing," as well as UNT-005-002 and UNT-005-015- will be changed to require the identification of any necessary "interim measures." In the example described above, the root cause is known but interim action is required to minimize further problems. No mechanism exists that requires the identification of actions necessary to bridge the gap between problem identification and its ultimate resolution.

(4) Date When Full Compliance Will Be Achieved

The revisions to the three procedure will be complete by September 30, 1991.