



**Entergy  
Operations**

Ref: 10CFR50.73(a)(2)(i)

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W385-01-0219  
A4.05  
QA

August 5, 1991

U.S. Nuclear Regulatory Commission  
ATTENTION: Document Control Desk  
Washington, D.C. 20555

Subject: Waterford 3 SES  
Docket No. 50-382  
License No. NPF-38  
Reporting of Licensee Event Report

Gentlemen:

Attached is Licensee Event Report Number LER-91-015-00 for Waterford Steam Electric Station Unit 3. This Licensee Event Report is submitted pursuant to 10CFR50.73(a)(2)(i).

Very truly yours,

D.F. Packer  
General Manager - Plant Operations

DFP/DDW/rk  
Attachment

cc: Messrs. R.D. Martin  
G.L. Florreich  
J.T. Wheelock - INPO Records Center  
E.L. Blake  
D.L. Wigginton  
N.S. Reynolds  
NRC Resident Inspectors Office

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PDR ADOCK 05000382  
S PDR

*Handwritten initials/signature*

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Waterford Steam Electric Station Unit 3	DOCKET NUMBER (2) 0 5 0 0 0 3 8 2 1	PAGE (3) 0 4
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TITLE (4) Failure to Stroke BD-103B When Restoring to Service due to a lack of Procedural Compliance

EVENT DATE (5)			LER NUMBER (6)		REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES
0	7	16	91	015	00	08	05	91	N/A
DOCKET NUMBER(S) 0 5 0 0 0 0									

OPERATING MODE (9) 1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)							
	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)	20.405(a)(1)(i)	50.38(a)(1)	50.73(a)(2)(v)	73.71(c)
POWER LEVEL (10) 1100	20.405(a)(1)(ii)	50.38(a)(2)	50.73(a)(2)(vi)	OTHER (Specify in Abstract below and in Text, NRC Form 300A)	20.405(a)(1)(iii)	50.73(a)(2)(i)	50.73(a)(2)(vii)(A)	
	20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(vii)(B)		20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(viii)	
	20.405(a)(1)(vi)	50.73(a)(2)(iv)	50.73(a)(2)(ix)					

LICENSEE CONTACT FOR THIS LER (12)

NAME D.W. Vinci, Operations Superintendent	TELEPHONE NUMBER 5 10 1 4 4 1 6 4 1 - 1 3 1 1 3 4
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRRDS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE)  NO

EXPECTED SUBMISSION DATE (15)

MONTH	DAY	YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately 175em single space typewritten lines) (16)

At 0800 hours on July 16, 1991, Waterford Steam Electric Station Unit 3 was operating at 100% power. Work had commenced to adjust the packing on Steam Generator Blowdown Containment Isolation Valve BD-103B. Limiting Condition for Operation 3.6.3 was in effect since the valve was inoperable, requiring the inoperable valve to be returned to operable status or the affected penetration isolated within 4 hours. Technical Specification (TS) 3.6.3 requires that each affected valve be stroked and timed prior to returning the valve to service. BD-103B was not tested prior to placing the valve in service and TS 3.6.3 requirements were not satisfied until 2146 on July 16, 1991 when the Operations Procedure 903-032 retest was completed.

The root cause of this event was a lack of procedural compliance. Upon granting permission for maintenance workers to adjust packing on BD-103B, the shift supervisor failed to enter BD-103B in the equipment out of service log and enter TS 3.6.3 to properly track the TS requirements for returning BD-103B to operable status. Since BD-103B was later tested satisfactorily, the valve would have performed its required function; therefore, this event did not threaten the health or safety of the public or plant personnel.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) Waterford Steam Electric Station Unit 3	DOCKET NUMBER (2) 0 5 0 0 0 3 8 2 9 1	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		0	15	0	0	2 OF 4

TEXT (If more space is required, use additional NRC Form 366A's) (17)

At 0800 hours on July 16, 1991, Waterford Steam Electric Station Unit 3 was operating at 100% power. Work had commenced to adjust the packing on Steam Generator (SG) (EIIS Identifier - SG) Blowdown System (EIIS Identifier - WI) Containment Isolation Valve (EIIS Identifier - ISV) BD-103B. Limiting Condition for Operation (LCO) of Technical Specification (TS) 3.6.3 was in effect since the valve was inoperable, requiring the inoperable valve to be returned to operable status or the affected penetration isolated within 4 hours. TS 3.6.3 requires that each affected valve be stroked and timed prior to returning the valve to service. BD-103B was not tested prior to placing the valve in service and TS 3.6.3 requirements were not satisfied until 2146 on July 16, 1991 when the Operating Procedure (OP) 903-032 retest was completed.

At 0800 hours on July 16, 1991, the Shift Supervisor (SS) gave mechanical maintenance personnel permission to commence Work Authorization (WA) 01080546 to adjust the packing on BD-103B. Work commenced, however, BD-103B was not entered in the equipment out of service (EOS) log as required by Operating Procedure (OP) 100-010, Equipment Out of Service Administrative Procedure. OP-100-010 provides guidance for the documentation of the removal from and restoration to service of Quality/Safety-related equipment. OP-100-010 specifically states that whenever packing is adjusted on ASME Section XI valves, a Quality/Safety-related EOS Checklist should be completed before removal when possible or as soon as possible thereafter. The SS did not ensure that the valve was entered in the EOS. In addition, TS 3.6.3 was not entered. When the WA was returned to the control room after packing adjustments had been made, the SS assumed that the retest had been completed and did not discuss the WA 01081546 retest requirements with the Control Room Supervisor.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (F-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) Waterford Steam Electric Station Unit 3	DOCKET NUMBER (2)  0   5   0   0   0   3   8   2	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		9   1	-   0   1   5	-   0   0	0   3	OF 0   4

TEXT (If more space is required, use additional NRC Form 366A's) (17)

During the 4 hours after the valve packing was tightened, the valve was cycled for an unrelated test of a blowdown system modification. OP-903-032, Quarterly IST Valve Tests Surveillance Procedure, however, requires a timed stroke test of the BD-103B to determine operability. Since the SS thought that the retest had been completed and since there was no EOS log entry to track the retest requirement, the 4 hour time limit was exceeded.

Midway during the next shift, the SS asked the Shift Technical Advisor (STA) if BD-103B should have been entered in the EOS log. The STA had assumed that the valve had been entered in the EOS log and, when questioned, the STA realized that the 4 hour time limit had been exceeded. OP-903-032 was satisfactorily completed and a late entry in the control room logs was made declaring BD-103B inoperable. BD-103B was declared operable at 2146 on July 16, 1991.

The root cause of this event is an inappropriate action by the SS in that BD-103B was not entered in the EOS log when the valve was out of service. The EOS log is used to document out of service quality/safety-related equipment and associated TSs and LCOs. If this valve would have been entered in the EOS log, the shift would have been more able to track time constraints associated with placing the valve out of service. The SS has been debriefed per the Improving Human Performance Program.

Since BD-103B was later tested satisfactorily, the valve would have performed its required function; therefore, this event did not threaten the health or safety of the public or plant personnel.

**LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION**

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-630), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555 AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) Waterford Steam Electric Station Unit 3	DOCKET NUMBER (2)  0   5   0   0   0   3   8   2	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		9   1	—   0   1   5	—   0   0	0   4	OF 0   4

TEXT (If more space is required, use additional NRC Form 386A's) (17)

SIMILAR EVENTS

LERs 88-021, 89-021 and 91-012 reported failures to perform required surveillances with an Emergency Diesel Generator out of service within the specified time limits. Corrective action for LER 89-021 included enhancements to the EOS log, requiring additional tracking information regarding LCO action statements.

PLANT CONTACT

D.W. Vinci, Operations Superintendent, 504-464-3134