



**ENTERGY**

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Entergy Operations, Inc.

R. F. Burski

W3F1-92-0134  
A4.05  
QA

March 30, 1992

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 91-31  
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,

*R.F. 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

ATTACHMENT 1

ENTERGY OPERATIONS, INC. RESPONSE TO THE VIOLATION IDENTIFIED IN  
APPENDIX A OF INSPECTION REPORT 91-31

VIOLATION NO. 91-031-01

Technical Specification 6.8.1.a requires, in part, that written procedures shall be maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Contrary to the above, on January 2, 1992, during stroke testing of the actuator for essential chilled water flow control valve CHW-129AB, Section 8.10 of Maintenance Procedure MM-007-027, Revision 0, Change 2, "Hydramotors - Models NH92 and AH92 Removal, Maintenance, Testing, and Installation," was found to be technically incorrect. Section 8.10 had been changed once before on December 20, 1990, because it could not be performed properly as written, due to inadequate technical reviews.

RESPONSE

(1) Reason for the Violation

Entergy Operations, Inc. admits this violation and believes that the root cause is personnel error in that the technical reviewer for Maintenance Procedure MM-007-027, Revision 0, Change 2, demonstrated inadequate attention to detail when performing the review. The technical review of Change 2 was performed by an experienced technician trained in hydramotors who should have been able to identify the problem in Section 8.10. In this particular case, the technician's experience with the subject material, combined with inattention to detail, may have contributed to the inadequate review; because of his familiarity with the process in question, he may have understood the steps even though there was information missing and the sequence was not clear.

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

Quality Notice (QN) 92-002 was issued to document the problem with MM-007-027 and track corrective action.

MM-007-027, Revision 0, Change 3 was approved on February 6, 1992. Change 3 is intended to be an interim solution until a complete revision of the procedure can be issued. To that end, the General Manager - Plant Operations has imposed limits on the use of the procedure until it can be revised, approving it "for 'immediate need' use only; first line supervisor to be present."

The Mechanical Maintenance Superintendent discussed this event with mechanical maintenance personnel as part of the department's duty week training program. In addition to covering the technical error in MM-007-027, the discussion emphasized the importance of providing feedback by documenting problems found in procedures or instructions.

In addition, as specified in the QN 92-002, the Maintenance Superintendent discussed this event with Mechanical Maintenance personnel at a general shop meeting. The importance of attention to detail was emphasized, particularly in the context of the technical review process.

Finally, although the technical review process is, for the most part, considered to be dependable and reliable, review indicates that improvement is possible. Generally speaking, procedure revisions and changes are written to correct specific deficiencies noted during use of the procedure; in such cases, it would be reasonable to include the individual that noted the discrepancy in the procedure review process. By capitalizing on the knowledge of personnel that are intimately familiar with the discrepancy being addressed, the review process is strengthened, especially when the process in question is highly complex as it was in this example.

To that end, the Maintenance Superintendent has directed that personnel identifying a deficiency that results in a revision or a change to a procedure be included- to the extent possible- in the review process for the updated procedure. Again, this should strengthen the procedure review process by taking advantage of specific knowledge or insight that may be available.

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

First, a revision to Maintenance Procedure MM-007-027, "Hydramotors - Models NH92 and AH92 Removal, Maintenance, Testing, and Installation," will be issued to incorporate the various changes and make the procedure easier to use.

Secondly, although a number of sessions have been held with Maintenance Department personnel to discuss this event, the individual who performed the technical review of Change 2 to MD-007-027 will be formally counseled to further highlight the importance of attention to detail in general and to the technical review process in particular.

(4) Date When Full Compliance Will Be Achieved

The procedure revisions will be complete by June 10, 1992.