

APPENDIX A  
NOTICE OF VIOLATION

Entergy Operations, Inc.  
Waterford, Unit 3

Docket No. 50-382/92-05  
License No. NPF-38

During an NRC inspection conducted on February 10-14, 1992, three violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

A. Inadequate Access Control - Personnel

License Condition E of the Waterford Steam Electric Station, Unit 3, Operating License NPF-38, dated March 16, 1985, requires that the licensee maintain in effect and fully implement all provisions of the Commission-approved physical security plan (PSP), including amendments and changes made pursuant to the authority of 10 CFR 50.54(p).

Section 6.1.3 of the PSP requires that walkthrough and hand-held metal detection equipment be capable of detecting a calibration source of a specified amount of nonferrous metal located on an individual with an effective detection rate of at least 85 percent with 95 percent confidence.

Sections 3.22 and 6.4 of the licensee's Security Equipment Inspection and Testing Procedure PS-012-109, Revision 12, Change 1, dated August 2, 1991, describes the placement of the test device and the technique to be used to challenge the effectiveness of the metal detectors.

Contrary to the above, on February 10, 1992, the inspectors observed and demonstrated that the four portal metal detectors at the personnel access point were defeated by tests utilizing the above described test device when carried through the detection equipment.

This is a Severity Level IV violation (Supplement III) (382/9205-01).

This is a repeat violation.

B. Failure to Log Safeguards Events

10 CFR 73.71(c)(1) requires, in part, that each licensee maintain a current log and record safeguards events as described in paragraphs II(a) and (b) of Appendix G. The safeguards events log shall be submitted to the NRC each quarter.

Contrary to the above, the inspectors determined on February 11, 1992, through a review of Safeguards Events Logs that 17 events were not recorded and properly reported to the NRC.

This is a Severity Level IV violation (Supplement III) (382/9205-02).

C. Inadequate Protection of Safeguards Information

10 CFR 73.21(d)(2) requires, in part, that while unattended, Safeguards Information be stored in a locked security storage container.

Contrary to the above, the inspectors determined on February 12, 1992, through a review of licensee records that Safeguards documents were left unsecured on October 7 and November 1, 1991. The Safeguards Information in each case was in an unsecured office outside the protected area.

This is a Severity Level IV violation (Supplement III) (382/9205-03).

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 a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). 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, consideration will be given to extending the response time. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

Dated at Arlington, Texas  
this 8th day of April 1992