

APPENDIX A

NOTICE OF VIOLATION

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

Docket: 50-382
License: NPF-38

During an NRC inspection conducted on January 6-10, 1992, two violations of NRC requirements were identified. The violations involved the failure to control changes to drawings and failure to control field design changes. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1991), the violations are listed below:

- A. Criterion VI of Appendix B of 10 CFR Part 50 and the licensee's approved Quality Assurance Program require that measures be established to control the issuance of documents, such as instructions, procedures, and drawings, including changes thereto, which prescribe all activities affecting quality.

Contrary to the above, the licensee failed to control the changes to Drawing LOU-1564-G167, Sheet 1, "Flow Diagram - Safety Injection," in that the revised drawing was posted in the control room without transferring the tags indicating that a safety-related temporary alteration (modification) affected the drawing.

This is a Severity Level IV violation (Supplement I)(382/9201-01).

- B. Criterion III of Appendix B of 10 CFR Part 50 and the licensee's approved Quality Assurance Program require that design changes, including field changes, shall be commensurate with those applied to the original design and be approved by the organization that performed the original design unless the applicant designates another responsible organization.

Contrary to the above, the licensee, during the performance of Work Authorization WA-99000406 on April 16, 1991, made an apparent field design change without the required review and approval. One conductor of safety-related electrical Cable 30588C-SMB was terminated at a different point than specified in the work authorization. The individual lined out, initialed, and dated the prescribed termination point, and then substituted a different termination point. This termination was independently verified and the entire design change package reviewed and closed. However, the field change process was not implemented and the affected drawing (LOU-1564-B424, Sheet 588S) was not changed to reflect the as-built configuration.

This is a Severity Level IV violation (Supplement I)(382/9201-02).

Pursuant to the provisions of 10 CFR Part 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 (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.

Dated at Arlington, Texas,
this 10th day of February 1992