



ENTERGY

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

R. F. Burski
Director
Nuclear Safety
Waterford 3

W3F1-95-0169
A4.05
PR

October 11, 1995

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 95-17
Reply to Notice of Violation

Gentlemen:

In accordance with 10CFR2.201, Entergy Operations, Inc. hereby submits in Attachment 1 the response to the violations identified in Enclosure 1 of the subject Inspection Report.

If you have any questions concerning this response, please contact R.T. Kullmann at (504) 739-6494.

Very truly yours,

R.F. Burski
Director
Nuclear Safety

RFB/RTK/tjs
Attachment

cc: L.J. Callan (NRC Region IV), C.P. Patel (NRC-NRR),
R.B. McGehee, N.S. Reynolds, NRC Resident Inspectors Office

160029
9510160203 951111
PDR ADOCK 05000382
PDR

IEO/
11

ATTACHMENT 1

ENTERGY OPERATIONS, INC. RESPONSE TO THE VIOLATIONS IDENTIFIED IN
ENCLOSURE 1 OF INSPECTION REPORT 95-17

VIOLATION NO. 9517-01

During an NRC inspection conducted on August 15-18, 1995, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," the first violation is listed below:

Technical Specification 6.8.1.a requires, in part, that the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)," Revision 2, February 1978 shall be established, implemented, and maintained. Regulatory Guide 1.33, Item 1.b, specifies that the licensee shall have administrative procedures controlling the authorities and responsibilities for safe operation and shutdown of the facility.

Procedure OP-100-001, "Duties and Responsibilities of Operators on Duty," Revision 9, section 5.7.2 specifies, in part, that instrument indications must be believed until the indications are proven incorrect. Section 5.7.3.1 requires during emergency operating procedure use that annunciators must be announced if the annunciators indicate conditions that may result in damage to equipment or personnel if not responded to. Section 5.7.3.2 specifies that the operators are responsible for remaining cognizant of other alarms and to acknowledge them as soon as conditions allow.

Contrary to the above, the NRC inspection team determined that on June 10, 1995, the control room operators failed to recognize and announce fire protection panel annunciator alarms upon notification of smoke and, subsequently, fire in the turbine building. In addition, the operators failed to acknowledge alarms to assure that no additional equipment problems had occurred, other than the turbine building non-safety related switchgear fire.

This is a Severity Level IV violation (Supplement I)(382/9517-01).

RESPONSE

(1) Reason for the Violation

Entergy Operations Inc. admits this violation and believes that the apparent cause of this event was that the expectations for crew response to a fire coincident with other complicating events have not been effectively communicated and reinforced. It is important to note that the non-safety related switchgear fire event of June 10, 1995, was an event that occurred concurrently with other off-normal conditions. These other off-normal conditions included a reactor trip, a partial loss of offsite power, and feedwater control difficulties. As stated in NRC Inspection Report 50-382/95-17 and Notice of Violation, the Shift Supervisor (SS) appropriately focused the activities of the Control Room Supervisor (CRS) on stabilizing the reactor and other plant systems.

One contributing cause of this violation was a lack of specific procedural guidance. Fire Protection Procedure FP-001-020 "Fire Emergency/Fire Report" is the governing procedure for fires. This procedure did not have steps to direct the Control Room staff to monitor the fire detection system control panel after a report of a fire in order to ascertain the extent of the fire.

A second contributing cause of this violation involves the design of the fire detection system control panel. The visual indication of an alarmed condition on the fire detection system control panel consisted of small lights on the front of the panel. The audible indication consists of a buzzer which is mounted in the fire detection system control panel. During the June 10, 1995, Reactor Trip/Non-Safety Switchgear fire event, dozens of alarms were received simultaneously. Although the design of the fire detection system control panel is adequate and meets all applicable requirements for panels of this type, lessons learned from the response to this event indicated that operator response to events of this type could be enhanced by making the existence of fire alarms more apparent.

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

A Condition Report (CR-95-0773) was generated in accordance with Waterford 3 Administrative Procedure UNT-006-011 "Condition Report" to provide a means to implement the Waterford 3 Corrective Action Program. In addition, a white strobe light has been installed on the fire detection system control panel in the Control Room. This strobe light illuminates upon receipt of a fire alarm. The presence of this strobe light should ensure that operators recognize that a fire alarm

has occurred, even when excessive noise levels are present in the Control Room.

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

Three additional corrective actions will be taken to avoid further violations of this type in the future. First, Fire Protection Procedure FP-001-020 "Fire Emergency/Fire Report" will be revised. The revision to this procedure will require operators to verify the extent of reported fires by monitoring the fire detection control panel in the Control Room. Secondly, Operations Training will enhance the fire drill program and simulator training to ensure that it reinforces management expectations concerning the fire detection system when responding to fires or potential fires. Lastly, Operations Personnel will review this event as Priority II required reading. This will further enhance the knowledge and expectations of Operations Personnel should Waterford 3 experience any similar events in the future.

(4) Date When Full Compliance Will Be Achieved

Waterford 3 will be in full compliance when the fire drill program is enhanced, the revision to Fire Protection Procedure FP-001-020 "Fire Emergency/Fire Report" is completed, and when the required reading has been completed. The scheduled completion dates for these items are June 30, 1996, for enhancing the fire drill program; February 15, 1996, for revising FP-001-020; and December 15, 1995, for completion of the required reading.

VIOLATION NO. 9517-02

During an NRC inspection conducted on August 15-18, 1995, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," the second violation is listed below:

License Condition 2.c.9.a, "Fire Protection," specifies that the licensee shall maintain in effect all provisions of the approved fire protection program described in the Updated Final Safety Analysis Report for the facility through Amendment 36 and as approved in the Safety Evaluation Report through Supplement 9.

Updated Final Safety Analysis Report, Section 9.5.1.6.2 specifies, in part, this fire brigade consists of five personnel on each shift trained and equipped in accordance with those requirements of Sections H and I of Appendix R to 10 CFR 50.

1. 10 CFR Part 50, Appendix R, III.I.1.a (5) specifies, in part, that initial fire brigade classroom instruction include the proper use of available fire fighting equipment and the correct method of fighting each type of fire. The types of fires should include fires in cables and cable trays.

Contrary to the above, as of August 17, 1995, the NRC inspectors determined that the licensee had not provided fire brigade classroom instructions that addressed the correct method of fighting fires in cables and cable trays.

2. 10 CFR Part 50, Appendix R, III.I.2 specifies, in part, that practice sessions shall be held for each shift fire brigade on the proper method of fighting the various types of fires that could occur in a nuclear power plant.

Contrary to the above, as of August 17, 1995, the NRC inspectors determined that the licensee had not provided practice sessions for each shift fire brigade that addresses the correct method of fighting fires in cables and cable trays.

These examples constitute a Severity Level IV violation (Supplement I) (382/9517-02).

RESPONSE

(1) Reason for the Violation

Entergy Operations, Inc. admits to this two part violation and believes that the root cause was inadequate fire brigade training lesson plans (which provided the classroom and fire field training) and a failure to fully implement an existing procedure (NTP-202).

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

Lesson Plan W-3-LP-FPFB-IFB01 (formerly LP N000-001) entitled "Fire Brigade Initial Classroom" has been revised to include material concerning fires in cables and cable trays. The revision was completed on August 18, 1995. This action partially addresses part one of the subject violation.

Lesson Plan W-3-OTH-FB-FFR04 (formerly LP N000-004-01) entitled "Fire Field Refresher" has been revised to include material concerning fires in cables and cable trays. The revision was completed on 10/4/95.

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

Lesson Plan W-3-LP-FPFB-IFB01 and Lesson Plan W-3-LP-FPFB-FFR04 will be presented to each fire brigade shift by 12/31/95. These training sessions will jointly provide both classroom and practice sessions for handling fires in cables and cable trays.

Implementation of the revised lesson plans will assure future compliance with the applicable section (5.1.5) of Procedure NTP-202 as it relates to including fire brigade training on handling of fires in cables and cable trays.

(4) Date When Full Compliance Will Be Achieved

Full compliance will be achieved by December 31, 1995.