

ENCLOSURE 1

NOTICE OF VIOLATION

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

Docket: 50-382  
License: NPF-38

During an NRC inspection conducted on August 20 through September 30, 1995, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (60 FR 34381; June 30, 1995), the violation is listed below:

Technical Specification 6.8.1.a requires, in part, that written procedures be established, implemented, and maintained covering the activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, Appendix A, "Quality Assurance Program Requirements," Sections 1 and 9 require that the licensee have administrative and maintenance procedures.

1. Procedure UNT-007-006, "Housekeeping," Attachment 6.6, "Housekeeping Requirements to Prevent Seismic Interactions With Operable Safety Related Equipment," Item 7 stated, in part, that standing ladders and similar items that upon falling could potentially damage operable safety-related equipment will be restrained or placed flat when unattended. Additionally, Item 10 stated, in part, that items weighing less than 20 pounds do not require restraints unless stored in a location where the falling impact can affect operation of operable safety-related equipment.

Contrary to the above, on August 25 and September 5, several ladders were noted, during plant tours, to be unattended, unrestrained and/or not placed flat, and either in contact with or within falling distance of safety-related equipment. Additionally, a tool belt with tools was draped across High Pressure Safety Injection Flow Control Valve SI-225A and loose scaffold boards and poles were located adjacent to the High Pressure Safety Injection Train A flow control valves.

2. Procedure MD-001-021, "M&TE Accountability Procedure," Section 5.7 stated, in part, that substitute measuring and test equipment may be used in place of specific measuring and test equipment designated in a procedure if the substitute has been shown to be equivalent by evaluation for the specific use. The electrical department measuring and test equipment equivalency document specified that Procedure ME-007-030, "G. E. Auxiliary Relay Model 12HGA17C," required the use of the Multi-Amp SST if using the Doble (a measuring instrument).

Contrary to the above, on September 6, 1995, the licensee failed to verify the equivalent use of measuring and test equipment prior to testing Emergency Feedwater Pump A Breaker 62-2 time delay dropout relay. The failure to verify appropriate measuring and

test equipment resulted in the inability to complete the Breaker 62-2 relay test procedure.

3. Procedure MM-007-015, "Main Steam Safety Valve Test," Step 3.1.6 required, in part, that the test performer ensure that the pressure gauges were calibrated within 7 days before testing main steam safety valves and had not been used prior to performance of testing. In addition, Step 3.1.7 required that the performer calibration records furnished by a qualified testing laboratory in accordance with ANSI 45.2-77 were part of the work package.

Contrary to the above, the licensee failed to verify that pressure test gauges were calibrated within 7 days of testing main steam safety valves and failed to include the calibration records in the work package.

This is a Severity Level IV violation (Supplement I) (382/9508-01).

The licensee implemented effective actions to correct the violation described in Item 2 above. As a result, no response is required for Item 2.

With respect to Items 1 and 3 above, and 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, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas, 76011, 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. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to 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.

Because the response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if it necessary to include such information, it should

clearly indicate the specific information that should not be placed in the PDR and provide the legal basis to support the request for withholding the information from the public.

Dated at Arlington, Texas,  
this *22nd* day of *November* 1995