

APR 10 1992

Docket No. 50-382
License No. NPF-38

Entergy Operations, Inc.
ATTN: Ross P. Barkhurst, Vice President
Operations, Waterford
P.O. Box B
Killona, Louisiana 70066

Gentlemen:

SUBJECT: NOTICE OF VIOLATION, NRC INSPECTION REPORT 50-382/92-04

Thank you for your letter of March 25, 1992, in response to our letter and Notice of Violation dated February 24, 1992. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,

Original Signed By:
Thomas P. Gwynn

for A. Bill Beach, Director
Division of Reactor Projects

cc:
Entergy Operations, Inc.
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Entergy Operations, Inc.
ATTN: John R. McGaha, Vice President
Operations Support
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Jackson, Mississippi 39286

RIV:TPS *RB*
HFBundy/lb
4/8/92

AC:TPS
AB:Rgn
4/18/92

D:DRS
SOGollins
4/8/92

TPG
D:DRP
ABBeach
4/10/92

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Entergy Operations, Inc.

-2-

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bcc to DMB (IE01)

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R. D. Martin
Section Chief (DRP/A)
DRSS-RPEPS
Project Engineer (DRP/A)
RIV File
Lisa Shea, RM/Alt
H. F. Bundy

Resident Inspector
DRP
MIS System
RSTS Operator
DES
J. E. Gagliardo

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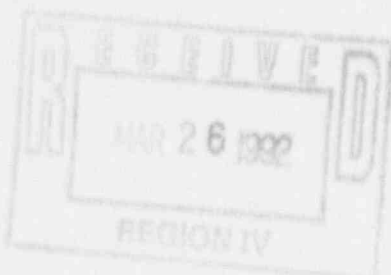


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Entergy Operations, Inc.

A. F. Burski



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QA

March 25, 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 92-04
Reply to Notice of Violation

Gentlemen:

In accordance with 10CFR2.201, Entergy Operations, Inc. hereby submit 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 C.J. Thomas at (504) 739-6531.

Very truly yours,

RFB/CJT/ssf
Attachment

cc: R.D. Martin, NRC Region IV
D.L. Wigginton, NRC-NRR
R.B. McGehee
N.S. Reynolds
NRC Resident Inspectors Office

92-0455

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ATTACHMENT 1

ENERGY OPERATIONS, INC. RESPONSE TO THE VIOLATION IDENTIFIED IN
APPENDIX A OF INSPECTION REPORT 92-04

VIOLATION NO. 9204-01

The Waterford Technical Specifications state, in part, in Section 6.8.1 that written procedures covering surveillance and test activities of safety-related equipment shall be established, implemented, and maintained. The licensee had established and was maintaining Administrative Procedure UNT-007-004, Revision 7, "Technical Specification Surveillance Control," in accordance with the above requirement. Section 5.3.7 of Administrative Procedure UNT-007-004 required the shift supervisor or control room supervisor, or at either's discretion, the shift technical advisor to perform post-test reviews of surveillance and test work packages to ensure cognizance of the results and whether or not all of the acceptance criteria were met. Work Authorization 01063159 covered a surveillance and test activity of safety-related equipment, which involved determination of the reactor moderator temperature coefficient.

Contrary to the above, the licensee failed to have the shift supervisor, control room supervisor, or shift technical advisor perform the required post-test review for Work Authorization 01063159.

RESPONSE

(1) Reason for the Violation

Entergy Operations, Inc. admits this violation and believes that the root cause of the event is an inadequate procedure in that Administrative Procedure UNT-007-004 failed to clearly define conditions for controlled maintenance and uncontrolled maintenance as they relate to surveillance test activities. At present, these terms are defined in relation to maintenance activities and are silent with respect to surveillance testing.

Work Authorization (WA) 01063159 required that Reactor Engineering and Performance (RE&P) collect data per NEI 2-002, "Variable Tavg Test," while plant operators varied plant conditions within the bounds of normal operating procedures. Since the engineers only gathered data and did not manipulate any plant equipment, they considered the test to not involve maintenance activities. Thus, per UNT-007-004, if the test results revealed that the acceptance criteria were satisfied, the WA package would not have to be submitted to the Shift Supervisor/Control Room Supervisor (SS/CRS) for post-test reviews. However, if the test results were questionable or any acceptance criteria not satisfied, UNT-007-004 requires that the SS/CRS be notified. Consequently, when the test results revealed that the acceptance criteria were satisfied, the lead worker processed the WA package for closure without submitting it to the SS/CRS for post-test reviews. Nevertheless, since plant conditions were varied during the surveillance test, the WA package should have been considered controlled maintenance and submitted to the SS/CRS for post-test reviews.

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

A review of a random sample of surveillance tests was performed to verify that post-test reviews were performed when required. No discrepancies were identified. In addition, a memorandum was issued to RE&P personnel to inform them of this event and to accentuate lessons learned.

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

The definitions in UNT-007-004 for controlled maintenance and uncontrolled maintenance will be revised so that they include guidance for surveillance testing.

(4) Date When Full Compliance Will Be Achieved

UNT-007-004 will be revised by June 5, 1992.