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W3F1-92-0143
A4.05
QA

April 17, 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 92-06
Reply to Notice of Violation

Gentlemen:

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

In addition to corrective actions to be taken in response to the violation, further action is being taken in an effort to enhance Waterford 3's boric acid corrosion program. First, Administrative Procedure UNT-007-027, "Control of Boric Acid Corrosion on the Reactor Coolant System", will be revised to require that inspection reports include a listing of all condition identifications generated as a result of the boric acid corrosion inspections. Secondly, the reactor coolant system components identified in an internal memo (dated May 17, 1988) as being potentially susceptible to boric acid corrosion will be reevaluated for inclusion in the boric acid corrosion program. These enhancements are scheduled for completion by August 15, 1992.

If you have any questions concerning this response, please contact B.R. Loetzerich at (504) 739-6636.

Very truly yours,

RFB/BRL/sat
Attachment
cc: R.D. Martin, NRC Region IV
D.L. Wigginton, NRC-NRR
R.B. McGehee
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NRC Resident Inspectors Office

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ATTACHMENT 1

ENTERGY OPERATIONS, INC. RESPONSE TO THE VIOLATION IDENTIFIED IN APPENDIX A OF INSPECTION REPORT 92-06

VIOLATION NO. 9206-02

10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by and accomplished in accordance with documented instructions, procedures, or drawings, of a type appropriate to the circumstances.

Paragraphs 5.1.5 and 5.2.1 of Administrative Procedure UNT-007-027, Revision 1, state, respectively, "A condition identification shall be generated to identify the leak, accomplish repair and evaluate the impact on the Reactor Coolant System (RCS) pressure boundary", and "Engineering Evaluations shall be performed on all boric acid leaks identified in areas noted on Attachment 6.1".

Contrary to the above, during the performance of a boric acid leak monitoring walkdown in the period March 16 through May 5, 1991, three valves (SI-332 A and SI-401 A & B) were observed by walkdown personnel to exhibit boric acid crystal buildup. There was no evidence that either the required condition identification was generated, or that an engineering evaluation was performed.

This is a Severity Level IV violation (382/9206-02).

RESPONSE

(1) Reason for the Violation

Entergy Operations, Inc. admits this violation and believes that the root cause is procedural inadequacy. Administrative Procedure UNT-007-027, "Control of Boric Acid Corrosion on the Reactor Coolant System", requires that for each identified leak, a Condition Identification (CI) must be initiated and an engineering evaluation performed. However, a clear definition of identified leakage is needed within the procedure to indicate the specific actions required for certain observed conditions.

UNT-007-027 requires that Plant Engineering personnel perform the boric acid corrosion inspections. The engineer who performed the visual examinations during the subject walkdown was familiar with the characteristics and operation of safety injection valves SI-332 A, SI-401 A and SI-401 B. The engineer observed the presence of boric acid crystals on the stem and packing gland of three safety injection valves. The engineer documented the observations in his inspection report, and specifically noted that the suspect areas were dry and that no corrosion existed.

The engineer did not consider the observed conditions to be indicative of identified leakage; rather, he considered the boric acid crystals to be typical of valve actuation. Given the physical characteristics of the valves (size, stem to packing construction, etc.), cycle of operation and the observed conditions of the crystals, the engineer concluded that further evaluation was not required for the safety injection valves. Therefore, a CI was not generated based on a field evaluation that no further actions were required. Although a later inspection confirmed the original field evaluation, a conflict existed with the governing procedure which lacked a clear definition of identified leakage which indicates required actions for certain observed conditions.

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

Plant Engineering performed another boric acid corrosion inspection during the period of February 17 through February 23, 1992. The inspection report concludes that the observed conditions of the three safety injection valves are not indicative of boric acid leakage. As such, no immediate corrective actions were required.

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

Plant Engineering will revise UNT-007-027 to clarify the definition of identified boric acid leakage and provide the inspection engineer with detailed instructions for required actions dependant upon the leakage conditions encountered.

(4) Date When Full Compliance Will Be Achieved

The procedural revision discussed per item (3) above shall be completed by August 15, 1992.