



**ENTERGY**

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U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

Subject: Waterford 3 SES  
Docket No. 50-382  
License No. NPF 18  
NRC Inspection Report 95-08  
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 Enclosure 1 of the subject Inspection Report.

If you have any questions concerning this response, please contact Doug Urciuoli at (504) 739-6625.

Very truly yours,

R.F. Burski  
Director  
Nuclear Safety

RFB/DMU/tjs  
Attachment

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

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ATTACHMENT 1

ENTERGY OPERATIONS, INC. RESPONSE TO THE VIOLATION IDENTIFIED IN  
ENCLOSURE 1 OF INSPECTION REPORT 95-08

VIOLATION NO. 9508-01, EXAMPLE 1

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), Item 1 of 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.

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.

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

RESPONSE

(1) Reason for the violation

Entergy Operations Inc. admits this violation and believes that the root cause was insufficient training given to workers, on the storage of loose items in proximity to safety related equipment.

On 11-3-94, Condition report CR-94-1019 was written to address previous concerns over various seismic issues. As part of the Condition Report's corrective actions, UNT-007-006, Housekeeping, was revised to provide specific guidelines to prevent loose items from interacting with operable safety related equipment during a seismic event. These requirements are listed in Attachment 6.6 of the procedure. Corrective actions for CR-94-1019 also required the Root Cause Analysis for this condition report be reviewed by Operations, Maintenance, and Modification & Construction personnel. Although the Root Cause Analysis describes and analyzes the plant conditions found in detail, it does not specifically list requirements for storing loose items in proximity to safety related equipment. A review of the training records with this CR package indicates all group reviews were completed by 3-9-95. Change 2, revision 6 to UNT-007-006 which added the storage requirements for loose items was not approved for issue until 4-28-95.

At the time of this violation, although specific guidance was available for storage of loose items in proximity to safety related equipment in procedure UNT-007-006, all site personnel may not have been aware of these requirements or where they could be found. In addition, contract workers hired for the refueling outage may not have been informed that the storage of loose items was required to be in accordance with Attachment 6.6 of UNT-007-006.

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

Condition reports CR-95-0753 and CR-95-1260 were 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. Actions to properly secure or remove the ladders, tool belt, scaffold boards and scaffold poles were initiated immediately upon being identified.

As stated above, procedural guidance for storage of loose items to prevent seismic interactions with operable safety related equipment had been added to the Housekeeping procedure, UNT-007-006. Waterford 3 believes the requirements in this procedure provide site personnel with adequate guidance to ensure safety related equipment will not be adversely affected by improperly stored loose items in proximity to this equipment.

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

Meetings will be held with all appropriate site groups to ensure they are aware of past problems and concerns with storage of loose items in proximity to safety related equipment. They will also be briefed on housekeeping requirements to prevent seismic interactions with operable safety related equipment, Attachment 6.6 of the Housekeeping procedure UNT-007-006. The need to ensure implementation of these requirements will be emphasized.

This information will be presented to the Operations group during shift briefings. For the Maintenance Department, this information will be disseminated in the monthly shop meetings. To ensure that this information is periodically reviewed by maintenance personnel, it will also be incorporated into the Continuing Training Lesson Plan.

The Construction group in accordance with the corrective action assignment for CR-95-0424, held training for all scaffold builders and specifically reviewed the guidelines of Attachment 6.6 to UNT-007-006. This training was completed 10-20-95. This information will also be added to the Craft Guide handout. Information in this handout is part of the training provided to all contract workers brought on site through the Construction Department.

In addition to the above, the requirements in UNT-007-006, attachment 6.6 for storage of loose items with respect to safety related equipment will be addressed in a site newsletter for distribution to all site personnel.

(4) Date When Full Compliance Will Be Achieved

Full compliance will be achieved by March 30, 1996.

VIOLATION NO. 9508-01, EXAMPLE 2

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), Item 2 of 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.

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 Dobie (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.

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

RESPONSE

As stated in the Notice of Violation, Waterford 3 implemented effective actions to correct the violation described above. As a result, the NRC requires no further response for this item.

VIOLATION NO. 9508-01, EXAMPLE 3

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), Item 3 of 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.

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 the third example of a Severity Level IV violation (Supplement I) (382/9508-01).

RESPONSE

(1) Reason for the Violation

Entergy Operations Inc. admits this violation and believes that the apparent cause of this event was inadequate attention to detail. The testing of Main Steam Safety Valves is an evolution that is performed infrequently, usually prior to each Refueling Outage. A pre-job briefing and WA/procedure review is performed before beginning the test. The pre-job briefing was performed but did not adequately review the requirements of the Prerequisites.

In the Prerequisite section of MM-007-015, step 3.1.6 requires that the pressure gauges are calibrated within 7 days of testing and have not been used prior to performance of testing. On 9/21/95, prior to the start of testing, it was discovered that the gauge calibration



date did not comply with this requirement. The gauge in fact had been calibrated on 9/2/95 in preparation for this test. Although the Test Supervisor instructed the M&TE lab to calibrate the necessary gauges and reserve them for safety valve testing, no provisions were made to accommodate testing delays with respect to the 7 day gauge calibration requirement. This possibility was not addressed in the pre-job briefing and was overlooked by the Test Supervisor and the lead PMM mechanic when the Prerequisites section was signed off.

In addition to the above, step 3.1.7 in the Prerequisite section of MM-007-015 requires M&TE calibration records be included in the work package. These calibration records were not included in the work package at the beginning of the test. Standard practice at Waterford 3 for all M&TE calibrations performed through the on-site M&TE Lab, is for records to be maintained in the lab for a period in excess of one calibration cycle. When M&TE is used, the unique M&TE number is recorded in the WA package. This provides traceability from the work package to the calibration records. The requirement of step 3.1.7 in MM-007-015 to include a copy of the calibration record in the WA package for on-site M&TE is contrary to normal site practice. This requirement was inadvertently overlooked by the Test Supervisor and the lead PMM mechanic in the pre-test briefing and when the Prerequisites were signed off.

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

A Condition Report (CR-95-0817) 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, prior to beginning the main steam valve testing, the backup gauges were immediately calibrated and installed. The calibration records for the gauges were included in the WA package.

The Test Supervisor and the lead PMM mechanic were counseled per Waterford 3's Improving Human Performance Program.

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

Maintenance Engineering will investigate and recommend the period of pre-calibrations on M&TE prior to performing the Main Steam Safety Valve Test. Procedure MM-007-015, "Main Steam Safety Valve Test", will then be revised accordingly.

In addition, the requirements of step 3.1.7 were reviewed by Maintenance Engineering and determined to apply only to Vendor supplied Measuring and Test Equipment. The intent of this step was to ensure the calibration records of vendor supplied M&TE were available on site prior to use. MM-007-015 contains different techniques used for main steam valve testing. Specifically, section 8.2 (Trevitest) requires a calibrated ring gauge be brought on site by the vendor, Furmanite. Step 3.1.7 was to ensure calibration records on the ring gauge, furnished by a qualified testing lab in accordance with ANSI 45.2-77 were included in the test package.

To minimize confusion and eliminate the requirement to maintain a duplicate of site M&TE calibration records in WA packages, step 3.1.7 should be identified as a prerequisite for Section 8.2 only. This requirement is not applicable to testing performed under Section 8.3.

(4) Date When Full Compliance Will Be Achieved

Waterford 3 will be in full compliance when procedure MM-007-015, "Main Steam Safety Valve Test", is revised to provide clarification on M&TE pre calibration requirements and calibration record requirements for vendor supplied M&TE. This action will be completed by 6-30-96.