



ENTERGY

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W3F1-92-0150
A4.05
QA

May 1, 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 92-03
Reply to Notice of Violations

Gentlemen:

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

It is important to note that Waterford 3 has identified several enhancements to the Licensee Event Report (LER) preparation and review process beyond the scope of cited Violation 92003-01. It is anticipated that these initiatives will improve the quality of Waterford 3 LER's.

In addition, your inspection report expressed the NRC's concerns with respect to Violation 92003-03 in that quality assurance personnel failed to properly revise work instructions. Entergy Operations, Inc. is equally concerned and intends to take additional measures beyond those discussed in the violation response. Accordingly, a Waterford 3 senior management representative will meet with Quality Assurance personnel to emphasize the sensitivity and importance of following work instructions and being held accountable, particularly from an inspector's view point. Also, because Waterford 3 management further acknowledges that this is not an isolated incident, the following measures will be taken:

1. Since group meetings to discuss similar concerns with the proper handling of work instructions were held in the past with Operations and Maintenance personnel (who frequently utilize the Work Authorization (WA) Process), this issue will be reinforced during upcoming normal shift and departmental shop meetings; and

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2. For selected Waterford 3 personnel other than those listed above, who utilize the WA process on an infrequent basis, a lessons learned training session will be held to heighten the awareness of personnel responsibilities regarding the proper utilization of work instructions.

If you have any questions concerning this response, please contact T.W. Gates at (504) 739-6697.

Very truly yours,

JJ Zaltich for RFBanski

RFB/TWG/ssf

Attachment

cc:

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

ATTACHMENT 1

ENTERGY OPERATIONS, INC. RESPONSE TO THE VIOLATIONS IDENTIFIED IN
APPENDIX A OF INSPECTION REPORT 92-03

VIOLATION NO. 92003-1

10 CFR Part 50.73(b) requires the contents of licensee event reports to contain a clear, specific, narrative description of the event and a description of any corrective actions planned as a result of the event, including those to reduce the probability of similar events occurring in the future.

Contrary to the above, Licensee Event Report (LER) 92-001, which addressed a problem with the core operating limit supervisory system (COLSS) azimuthal tilt alarm setting and surveillance test deficiencies, failed to address related problems found on the COLSS margin alarms associated with the peak linear heat generation rate (PLHGR) and departure from nucleate boiling ratio (DNBR).

RESPONSE

(1) Reason for the Violation

Entergy Operations, Inc. admits this violation and believes that the root cause is inadequate communication. It appears that discussion of some aspects of this LER was compartmentalized to the extent that not all of the cognizant personnel appreciated the full extent of the issues under consideration. In retrospect, it seems clear that communications difficulties, combined with the complex nature of the equipment involved, impeded consolidation of the available information and ultimately precluded timely assessment of the event's generic implications. As a result, LER 92-001 did not address related problems with the margin alarms associated with PLHGR and DNBR.

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

Revision 1 to LER 92-001 was transmitted to the NRC on March 6, 1992. The revised LER discusses the problems related to implementation of the Technical Specification surveillance requirements for the PLHGR and DNBR margin alarms.

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

To ensure that all pertinent issues are identified early in the process, communicated to cognizant personnel, and carefully evaluated, Administrative Procedure UNT-006-012, "Development and Review of Licensee Event Reports, Special Reports, and Security Incident Reports," will be revised to add a "steering" function to the LER preparation process. Following the determination of reportability for an event, Event Analysis and Reporting personnel and appropriate plant management will meet to develop a plan for disposition of the LER. In general, it is expected that this input will provide a focus for the LER preparation process and ultimately result in improved LERs. More specifically, it is expected that a meeting of this type will provide the framework by which a

thorough evaluation of the event scope, including generic implications, may be performed. Perhaps most importantly, the meeting should allow for the identification of problem areas early in the process such that they may be carefully evaluated.

(4) Date When Full Compliance Will Be Achieved

Administrative Procedure UNT-006-012 will be revised by August 5, 1992.

VIOLATION NO. 92003-3

Criterion V of Appendix B to 10 CFR Part 50 and the licensee's approved quality assurance program description require 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.

The specified postmaintenance retest for Work Authorizations 01071582 and 01071648 stated, "OPS QA (Operations Quality Assurance) to perform VT-2 of steam generator (SG) manways at normal reactor coolant system (RCS) operating temperature and pressure".

Contrary to the above, the postmaintenance retest was signed off by inspection personnel as completed when, in fact, the VT-2 inspections were performed at 490° F, which was below normal RCS operating temperature of at least 544° F.

RESPONSE

(1) Reason for the Violation

Entergy Operations, Inc. admits this violation and believes that the root cause is failure to follow procedure. The responsible inspection personnel failed to implement changes to Work Authorizations (WAs) 01071582 and 01071648 in accordance with Administrative Procedure UNT-005-015, "Work Authorization Preparation and Implementation".

WAs 01071582 and 01071648 indicated that a VT-2 (visual examination) of the SG primary manways be conducted at normal RCS operating temperature (NOT) and was to pressure (NOP). The WA requirements for NOT and NOP were extracted from Administrative Procedure MD-001-023, "ASME Section XI Pressure Testing". MD-001-023 requires that a VT-2 inspection be conducted at NOP and NOT following the reassembly of a Class 1 mechanical joint. The VT-2 examinations are required to meet the system leakage test requirements of ASME Section XI. However, the performance of the VT-2 at NOT is not a Section XI requirement.

The inspectors were aware that the specific instructions given in WA 01071582 and 01071648 exceeded the ASME Section XI requirements for such inspection and therefore consulted with their supervision. Their supervisor, in turn consulted with the ISI coordinator, Section XI engineer, and control room personnel, and confirmed that NOT was not an ASME Section XI requirement for the VT-2 inspections. Given that assurance, the inspection personnel entered "N/A" on the inspection records as satisfaction of the NOT condition. As such, although the inspection personnel performed appropriate VT-2 inspections, they failed to follow UNT-005-015 which provides instructions for changes to the scope or intent of work authorizations.

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

As immediate corrective action, the responsible supervisor was counseled concerning the importance of documented instructions. In addition, site inspection personnel were notified by internal memorandum of their responsibilities concerning procedural compliance, and required to acknowledge receipt and understanding of the memorandum by return signature.

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

Administrative Procedure MD-001-023, "ASME Section XI Pressure Testing" provides controls for pressure testing following repairs and replacements as required by ASME Section XI. Section 5.1.6 of this procedure currently indicates that when an ASME Class 1 mechanical joint is disassembled and reassembled, a VT-2 examination shall be conducted at NOT and NOP. This procedure will be revised to indicate that the VT-2 examinations are to be conducted at only NOP.

(4) Date When Full Compliance Will Be Achieved

The revision to MD-001-023 shall be completed by August 31, 1992.