



**ENTERGY**

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**R. F. Burski**  
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Nuclear Safety  
Waterford 3

W3F1-96-0002  
A4.05  
PR

January 22, 1996

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

Subject: Waterford 3  
Docket No. 50-382  
License No. NPF-38  
NRC Inspection Report 95-09  
Reply to Notice of Violation

Gentlemen:

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

If you have any questions concerning this response, please contact D.F. Litolff at (504) 739-6693.

Very truly yours,

R.F. Burski  
Director  
Nuclear Safety

RFB/DFL/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 VIOLATIONS IDENTIFIED IN  
APPENDIX A OF INSPECTION REPORT 95-09

VIOLATION NO. 9509-01

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

Procedure UNT-005-009, "Reporting and Evaluating Out-of-Calibration Measuring and Test Equipment," Section 4.7, stated, in part, that the user is responsible for timely reporting of suspect, damaged, lost, inoperative, or misplaced measuring and test equipment to the measuring and test equipment facility. Procedure UNT-005-011, "Calibration and Control of Measuring and Test Equipment," Section 4.4, states, in part, that users are responsible for the immediate return of suspect measuring and test equipment.

Contrary to the above, on October 13, 1995, personnel failed to implement a maintenance procedure in that maintenance technicians using suspect test equipment did not report or immediately return the suspect measuring and test equipment to the measuring and test equipment facility.

This is a Severity Level IV violation (Supplement 1). (382/9509-01)

RESPONSE TO VIOLATION 9509-01

(1) Reason for the Violation

Entergy Operations Inc. admits this violation and believes that the root cause was failure to follow procedure in that the responsible foreman failed to notify the M&TE Lab of the suspect equipment in a timely manner as required by plant procedures.

During 3AB313 Feeder Breaker 74HR alarm relay testing on October 13, 1995, the dc voltage supply of a Doble 2500 test set failed to operate properly. Procedure UNT-005-011, "Calibration and Control of Measuring and Test Equipment," states that M&TE users are responsible for immediate return of suspect M&TE. Procedure UNT-005-009, "Reporting & Evaluating Out of

Calibration Measuring and Test Equipment," states that the M&TE user is responsible for timely reporting of suspect, damaged, lost, inoperative, or misplaced M&TE to the M&TE issue facility. After completing the relay test using a separate power supply and instrument, the technicians informed the electrical foreman of the suspect equipment. No further action was taken at this time to report the suspect equipment to the M&TE Lab.

On October 16, 1995 the suspect Doble 2500 remained in service and was used to perform a dc ampere test for another relay. On the following day, the responsible foreman reported the test set to the M&TE Lab, who then determined that only the dc volts source was affected. Thus, using the test set for dc amps had no affect on plant equipment. A limited use sticker was placed on the test set so that the failed source would not be used and a precaution was entered into the M&TE equivalency book not to use the dc voltage as a calibrated source on the particular Doble 2500. Although no plant components were affected by this event, the failure to report the suspect test set in a timely manner created the potential to reissue the faulty M&TE for use in the plant.

The NRC has indicated a concern of a potential decline in the control of M&TE based on recently identified deficiencies in that area, which include two violations cited in IR 95-08 and the violation discussed above. Waterford 3 shared this concern and, as such, has evaluated these events collectively. It has been concluded that these events do not represent a trend in the area of M&TE control; rather, they involve general human performance issues. Maintenance management at Waterford 3 has recently identified a need for general improvements in the area of human performance activities based on conditions identified in various areas of maintenance, not just M&TE. A need for increased awareness in all disciplines of maintenance was recognized as an opportunity to improve individual as well as departmental performance. As a result, AIM ("Always Improving Maintenance") Sessions have been established. Maintenance personnel participate in the AIM sessions once every two weeks. The purpose of these meetings is to provide an open forum for all maintenance personnel to discuss strengths, opportunities, and process improvements. One expected result of these meetings is a heightened awareness of maintenance personnel through discussion of adverse conditions as they are identified and by continually improving processes.

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

On 10/17/95 the responsible foreman notified the M&TE Lab of the suspect M&TE. The M&TE Lab installed a limited use sticker on the equipment so that the failed range would not be used.

The responsible foreman made a hand written precaution in the electrical shop's M&TE equivalency book not to use the dc voltage as a calibrated source on the suspected M&TE.

On 11/20/95 an electronic message was sent to all Maintenance foremen reminding them of the requirements of UNT-005-009 and UNT-005-011.

The foreman who failed to report the suspect M&TE in a timely manner was counseled by maintenance management per the Waterford 3 Improving Human Performance (IHP) program.

Maintenance foremen have discussed this event with mechanical, electrical, and I&C shop personnel, emphasizing the need to immediately pull M&TE that is found inoperable, or suspected to be inoperable, from use and to report the equipment to the M&TE Lab.

The general awareness of maintenance personnel in the areas of maintenance strengths, issues and process improvements has been increased through the development of AIM Sessions, which provide opportunity to discuss these items. The recent violations involving M&TE, including expectations in the area of human performance, were discussed at an AIM meeting held on December 1, 1995.

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

An additional review of M&TE-related issues over the past two years will be performed to determine if any further actions are necessary in this area.

(4) Date When Full Compliance Will Be Achieved

The additional review of past M&TE-related issues will be completed by February 30, 1996.

VIOLATION NO. 9509-02

10 CFR 73.55(d)(7)(i)(B) requires, in part, that the licensee positively control all points of personnel access to vital areas.

Contrary to the above, on October 25, 1995, the licensee failed to provide positive control of personnel access to a vital area in that three individuals gained access to a vital area without their access authorization being verified by the licensee.

This is a Severity Level IV violation (Supplement III). (382/9509-02)

RESPONSE TO VIOLATION NO. 9509-02

(1) Reason for the Violation

Entergy Operations Inc. admits this violation and believes that the root cause was inappropriate action in that a posted security officer failed to log three individuals entering into a controlled area. A contributing cause was that the configuration of the access area in question was such that it would allow more than one individual to enter simultaneously.

On October 25, 1995, a security officer was posted at door 27 which allowed access into a controlled area. The security officer was tasked to log individual's entry into this area where maintenance was being performed on the Emergency Diesel Generators A and B. While the security officer was performing his assigned duty, three individuals carrying scaffolding material inadvertently entered door 27 without logging in and without being immediately noticed by the posted security officer. The security officer subsequently noticed that the individuals had entered the area without logging in, but because he was in the process of logging others into the area, he erroneously felt he could not stop what he was doing and escort these individuals out of the area or get them to log in. Shortly afterwards, the posted security officer requested another security officer, who was in the area, to escort these individuals out of the controlled area. However the three individuals had departed the controlled area, again without going through the logging process and without being noticed by the posted security officer, before the security officer could escort them out of the area.

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

The three individuals who entered door 27 without logging in or out with the posted security officer attempted to re-enter the area. However, the security officer, who failed to log them in originally, stopped the individuals and explained the requirement for logging in prior to entering the area. The security officer then properly logged the individuals into the area.

The access through door 27 was reconfigured to allow for passage of one individual at a time.

The posted security officer received a verbal reprimand for failing to log the individuals in and was counseled per the contract security organization contractor disciplinary standards on the importance of being attentive while performing access control duties.

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

The details of this event will be discussed with all security personnel. Proper access control requirements will be emphasized during this discussion.

The Plant security department will review their procedures and practices for maintaining positive access control with posted individual(s) to ensure that controls are in place to compensate for plant configuration which may hinder access control.

(4) Date When Full Compliance Will Be Achieved

The actions described above will be completed by February 29, 1996.