

APPENDIX A

NOTICE OF VIOLATION

Entergy Operations, Incorporated Docket No.: 50-382
Waterford Steam Electric Station, Unit 3 Operating License No.: NPF-38

During an NRC inspection conducted on March 15 through May 2, 1992, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. Technical Specification 6.8.1 requires, in part, that written procedures shall be implemented covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 1, February 1978.

Administrative Procedure UNT-005-010, Revision 2, "Independent Verification Program," Section 3.4, states, in part, that a hold point is a point in the maintenance process beyond which work may not proceed until the authorized inspector has observed the work and given consent to proceed.

Work Authorization 01092496, Step 05, was preceded by a hold point that stated, "Door No. 68 shall be closed before the following steps can be performed."

Contrary to the above, on April 15, 1992, Step 05 was completed prior to completing and signing off the hold point, thus defeating the purpose of the hold point.

This is a Severity Level IV violation (Supplement 1) (VIO 92008-1).

- B. Technical Specification Surveillance Requirement 4.8.1.1.2.d.12.(a) requires each emergency diesel generator to be demonstrated operable at least once per 18 months during shutdown by verifying that the "turning gear engaged" diesel generator lockout feature prevents diesel generator starting only when required.

Contrary to the above, on April 24, 1992, Surveillance Procedure OP-903-115(116), Revision 0, "Train A(B) Integrated Emergency Diesel Generator/Engineering Safety Features Test," Section 7.2, failed to adequately implement the above surveillance requirement. The procedure isolated control air through the lockout feature rather than challenging the lockout feature itself to verify operability. Consequently, the surveillance requirement may not have been met since the plant license was issued on March 16, 1985.

This is a Severity Level IV violation. (Supplement 1) (VIO 92008-2)

Pursuant to the provisions of 10 CFR Part 2.201, Entergy Operations, Inc., is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C.

20555 w^o copy to the Regional Administrator, Region IV, and a copy to the NRC Resident Inspector, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation; (2) the corrective steps that have been taken and the results of the corrective steps that will be taken to avoid further violation; and (3) the date when full compliance will be achieved. If an appeal is received within the time specified in this Notice, the Commission may issue an Order or Demand for Information as to why such other action as may be proper should not be taken. Where good cause is shown, consideration may be given to extending the response time.

Dated at Austin, Texas,
this 28th day of May 1992