



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064

JUL 14 1992

Docket No. 50-382  
License No. NPF-38

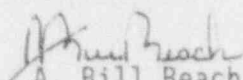
Entergy Operations, Inc.  
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Gentlemen:

SUBJECT: NRC INSPECTION REPORT NO. 50-382/92-08

Thank you for your letter of June 26, 1992, in response to our letter and Notice of Violation dated May 28, 1992. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,

  
A. Bill Beach, Director  
Division of Reactor Projects

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RIV: C/PSA:DRP	D:DRP B			
WDJohnson;lt	ABBeach			
7/13/92	7/14/92			



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Entergy Operations, Inc.

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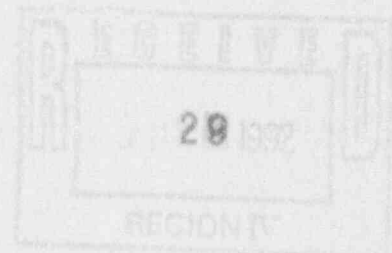
R. F. Burski

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June 26, 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 92-08  
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.

In addition, your inspection report expressed concern that Violation 92008-1 might indicate that past corrective action to improve the Independent Verification Program has not been fully effective. Entergy Operations, Inc. shares that concern.

In response to violation 92003-3, Entergy Operations planned a number of meetings and training sessions to discuss various aspects of the violation. In addition, we will include a discussion of the Independent Verification Program in general and the use of hold points in particular. We anticipate that the meetings will heighten personnel awareness of their responsibilities and reinforce management expectations in this important area.

Finally, the inspection report indicates your concern that Violation 92008-2 is the second recent example of failing to satisfy surveillance requirements because of deficient procedures. In response to that concern, Entergy Operations reviewed the events documented in Licensee Event Reports (LERs) 92-001-01 and 92-004. As discussed in LER 92-004, we believe that the events described in the two LERs have root causes that are unrelated. As such, we have full confidence that the Waterford 3 Technical Specification Surveillance program is technically sound.

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NRC Inspection Report 92-08

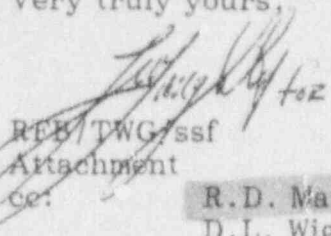
Reply to Notice of Violations

Page 2

June 26, 1992

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

Very truly yours,

  
REB/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 92-08

VIOLATION NO. 92008-1

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 2, 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 a signing off the hold point, thus defeating the purpose of the hold point.

This is a Severity Level IV violation (Supplement I).

RESPONSE

(1) Reason for the Violation

Entergy Operations, Inc. admits this violation and believes that the root cause is personnel error resulting from a lack of familiarity with the Waterford 3 Work Authorization (WA) process and certain aspects of the Independent Verification Program. Partially as a result of an improper WA format, a supervisor who had the justification necessary to delete a procedure step/hold point as not applicable ("NA") failed to satisfy procedural requirements before continuing with the work.

A number of causal factors have been identified: First, the hold point in question was not written in accordance with the format provided in TAB 8 of the Plant Information Guide Notebook (PIGN). Instead, it combined "action" and "verification" activities into a single step and did not include a signature blank for the independent verifier. In addition, the PIGN recommends that specific wording precede the independent verifier signature blank: "Do not proceed beyond this hold point until signed or deleted. Justification for deletion must be documented per UNT-005-015." Because the hold point, as written, did not conform to the PIGN format, the supervisor was deprived of guidance that could have prevented this violation.

Second, the requirements of Administrative Procedure UNT-005-015, "Work Authorization Preparation and Implementation," were not observed when the procedure step/hold point were deleted from the WA. By the PIGN guidance, the WA should have included one step requiring that door 68 be closed and a separate hold point to verify the closure. If that format had been observed, the decision that door 68 did not have to be closed would have required the deletion of a work instruction step and an associated hold point.

The deletion of the procedure step is governed by Section 5.8.8 of UNT-005-015 since it represents a change to the scope or the intent of the WA. Per the procedure, the change should have received the concurrence of those original reviewers affected by the change. Then, per UNT-005-010, Section 5.2.3, the hold point associated with the deleted step could have itself been deleted.

The circumstances surrounding this violation do not indicate that the integrity of the Independent Verification Program has been compromised. Although all of the requirements were not satisfied, the supervisor did take steps to confirm that the procedure step/hold point could be safely bypassed. "Lack of familiarity" is cited as the cause of this violation because the identified problems were largely administrative, involving a supervisor and a group that has utilized the work authorization process only infrequently and has limited experience with some aspects of the independent verification program.

Mitigating factors notwithstanding, the responsible individual, as a supervisor, should have fulfilled the administrative requirements associated with hold points. Since he did not, the root cause of this violation is personnel error.

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

Because the actions taken by the Radwaste Supervisor were adequate from a technical standpoint, no immediate corrective action was necessary. However, the supervisor was counseled about the event by the Lead Supervisor of the Radwaste Department.

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

The specifics of this event as well as the Waterford 3 Independent Verification and Work Authorization processes will be discussed with Radwaste Department personnel as part of continuing training.

(4) Date When Full Compliance Will Be Achieved

Training for Radwaste Department personnel will be complete by September 18, 1992.

VIOLATION NO. 92008-2

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.

RESPONSE

(1) Reason for the Violation

Entergy Operations, Inc. admits this violation. The root cause of the failure to implement the requirements of Technical Specification Surveillance 4.8.1.1.2.d.12.(a) was that Surveillance Procedure OP-903-115(116), "Train A(B) Integrated Emergency Diesel Generator/Engineering Safety Features Test," was inadequate. Entergy Operations, Inc. believes that the procedure was inadequate because the intent of the surveillance requirement was not well understood. As a result, the procedure has not properly challenged the turning gear interlock function since it was revised in 1984.

Surveillance Procedures OP-903-115 and -116 were approved in April, 1991 to provide separate test procedures for the A and B Emergency Diesel Generators (EDGs). Previously, EDG testing was conducted in accordance with Surveillance Procedure OP-903-069, originally titled "Emergency Diesel Post Inspection Operability Check."

OP-903-069, Revision 0, was approved on August 4, 1982. The procedure requires that the EDG turning gear engaged lockout feature be tested by engaging the turning gear motor and attempting to start the engine.

Sometime later, the decision was made to revise OP-903-069. While in the review cycle, a reviewer noted the non-conservatism in the turning gear interlock test and commented that attempting to start the EDG with the turning gear engaged could damage the engine if the interlock failed. The author acknowledged the concern and rewrote that section of the procedure to preclude a start attempt with the turning gear actually engaged.

Revision 1 to OP-903-069 was approved March 20, 1984. The procedure for testing the turning gear engaged lockout feature first directs that all control air be isolated to the control air header. It then requires verification that the "turning gear engaged" annunciator is alarming and that the diesel will not roll when a local start is attempted. However, review of the arrangement of the Waterford 3 EDG air starting system reveals that this sequence is essentially meaningless: the alarming annunciator and the failure of the diesel to start are a given if control air is isolated as described. More importantly, the test results are in no way dependent on the proper function of the turning gear interlock valves. Since the interlock valves are not challenged, the test procedure does not satisfy the surveillance requirement.



In contrast to the original version, Revision 1 to OP-903-069 clearly reflects a misunderstanding of the intent of the surveillance requirement. In attempting to limit the potential for damage to the EDG from the turning gear interlock test, the revised procedure focused on verifying that the system would respond as expected when in a vented condition as opposed to ensuring that the system would be vented when required. In retrospect, it is clear that the revised procedure did not satisfy the surveillance requirement because it did not challenge the interlock valves.

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

As indicated in the inspection report, immediate corrective action was taken to danger tag the turning gear units for both EDGs in the disengaged position thus temporarily removing any operability concern.

Licensee Event Report (LER) 92-004, issued June 5, 1992, documents the failure to fully implement the surveillance requirement.

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

Surveillance Procedures OP-903-115 and OP-903-116 will be revised to ensure that the turning gear interlock valves are challenged such that the surveillance requirement is satisfied.

(4) Date When Full Compliance Will Be Achieved

Surveillance Procedures OP-903-115 and OP-903-116 will be revised by September 18, 1992.

bcc to DMB (IE01)

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