



W3F1-97-0039

A4.05

PR

March 10, 1997

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 96-14
Reply to Notice of Violation

Gentlemen:

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

Waterford 3 acknowledges the two concerns expressed in the cover letter to the inspection report: (1) the inadequate procedure for the calibration of the hydrogen analyzers indicates a lack of rigor during the development of the procedure in that a number of vendor recommended tests were not followed, and (2) failure to follow procedures regarding reporting of security lighting deficiencies indicates a continuing problem with procedural compliance among station personnel.

Regarding the first concern, Waterford 3 has an initiative in place to improve plant procedures. The purpose of this initiative is to enhance the procedure processes and content to support safe and reliable plant operations at Waterford 3. A multi-discipline procedure quality action team has been developed as an initial step in this process.

Regarding the second concern, Waterford 3 continues to take comprehensive corrective actions to address this matter. The comprehensive corrective actions are

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Reply to Notice of Violation (IR 96-14)

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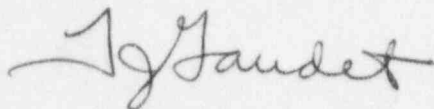
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detailed in letter W3F1-96-0213 dated December 13, 1996. As part of the corrective actions committed to in that letter, Waterford has been reemphasizing procedural adherence and self-checking techniques in plant safety and "All Hands" meetings. Actions taken to date, in concert with the corrective actions delineated in the attached response, will help prevent similar occurrences.

If you have any questions concerning this response, please contact me at (504) 739-6666 or Jeff Thomas at (504) 739-6531.

Very truly yours,

A handwritten signature in cursive script, appearing to read "T.J. Gaudet".

T.J. Gaudet
Acting - Director
Nuclear Safety & Regulatory Affairs

TJG/GCS/tjs
Attachment

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

ATTACHMENT 1

ENTERGY OPERATIONS, INC. RESPONSE TO THE VIOLATION IDENTIFIED IN
ENCLOSURE 1 OF INSPECTION REPORT 96-14

VIOLATION NO. 50-382/9614-02

Technical Specification 6.8.1.a states, in part, that written procedures shall be maintained covering surveillance and test activities of safety-related equipment.

Contrary to the above, procedures were not maintained covering surveillance activities of safety-related equipment in that Procedure MI-003-431, "Containment Hydrogen Analyzer Functional Test and Calibration," did not provide adequate instructions for the testing of the hydrogen analyzers.

This is a Severity Level IV violation (Supplement I) 50-382/9614-02.

RESPONSE

(1) Reason for the Violation

Entergy believes that the root cause of this violation is a lack of rigor and a questioning attitude in the development and review of MI-003-431, "Containment Hydrogen Analyzer Functional Test and Calibration HRAIA3800 A or B." During the development of MI-003-431, adjusting flow instruments prior to recording "as found" values was not considered preconditioning of equipment.

Inspection Report 96-14 stated that Waterford 3 did not implement vendor recommended testing. It should be noted that, while we agree we were not verifying all operating parameters described by the vendor, the manual states that the subject testing is "neither necessary nor desirable to be performed on a routine basis." Waterford 3 performed flow testing on the analyzers and while slight adjustment of the flows has been shown to not have a significant effect on sampling capability, we believe performance of the periodic testing described in the vendor manual is prudent.

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

The current revision of procedure MI-003-431 was approved on April 17, 1992. Since that time Waterford 3 management has emphasized the expectations of having a self-critical and questioning attitude along with

developing a "defense-in-depth" barrier mentality. All-hands and departmental meetings were conducted to emphasize these expectations.

Testing was performed to determine if the flow and pressure were set at the vendor recommended values. The following results were achieved:

- Flow and pressure setpoints on the Hydrogen Analyzers were set to recommended values in the vendor manual.
- Sample flow rate was varied while monitoring sample response time, return flow rate back to containment, and the hydrogen concentration of the sample. Results showed that changing the sample flow rate had little or no effect on these parameters.
- Procedure MI-003-431, was performed satisfactorily as a retest.

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

1. This event will be discussed with I&C personnel at departmental meetings. Emphasis will be placed on Waterford 3 guidelines for procedure improvements. Also emphasized will be the need to scrutinize I&C procedures for possible preconditioning of equipment prior to testing.
2. All three maintenance disciplines at Waterford 3 will review their respective surveillance procedures to ensure potential preconditioning instructions do not exist.
3. Procedure MI-003-431, "Containment Hydrogen Analyzer Functional Test and Calibration HRAIA3800 A or B," will be revised as follows:
 - "As found" flow and pressure data will be taken before purging the analyzer. An acceptance range will be used to determine if corrective actions are warranted. This range will not be used as acceptance criteria for the calibration procedure. It will be solely a mechanism for "fine tuning" the analyzer flow and pressure as necessary.
 - The "as found" data will be recorded and used for trending purposes.
 - There will be no flow or pressure adjustments prior to recording "as found" data. This will eliminate the potential for preconditioning during the calibration procedure.
4. A task will be generated for each analyzer to periodically test the solenoid valves inside the control panel. This test will ensure proper operation of the solenoid valves in both the open and closed direction.
 - The solenoid valves will be de-energized and connected to a test panel from which each valve can be powered individually.

- Each solenoid valve will be energized and de-energized separately from the test panel with the analyzer in different configurations to ensure each valve operates properly in both the open and closed directions.
5. A task has been generated to periodically perform pressure and flow tests of each analyzer in accordance with the vendor manual. This test will ensure that pressure regulators are set properly and flows are adjusted correctly.
- (4) Date When Full Compliance Will Be Achieved

Tasks have been generated to periodically perform pressure and flow testing of the analyzers. Revisions to MI-003-431 and the generation of periodic tasks to perform solenoid valve testing will be completed by April 11, 1997 at which time Waterford 3 will be in full compliance.

ATTACHMENT 1

ENTERGY OPERATIONS, INC. RESPONSE TO THE VIOLATION IDENTIFIED IN
ENCLOSURE 1 OF INSPECTION REPORT 96-14

VIOLATION NO. 9614-04

Technical Specification 6.8.1.a requires, in part, that written procedures shall be implemented covering applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A, Sections 1 and 9, require that the licensee have administrative and maintenance procedures.

Administrative Procedure PS-012-102, "Protective Lighting," Revision 6, Section 5.3.2, required, in part, that in the event of a protective lighting system deficiency or failure is observed when lighting is needed, the reporting officer will immediately notify the central or secondary alarm station.

Contrary to the above, on December 17, 1996, a security patrol officer observed a protective lighting system deficiency when lighting was needed and did not immediately notify the central or secondary alarm station.

This is a Severity Level IV violation (Supplement 1) 50-382/9614-04.

RESPONSE

(1) Reason for the Violation

The reason for the violation is personnel error in that the security officer did not follow the requirements of administrative procedure PS-012-102. The security officer did not follow the procedure which states upon the discovery of a temporary lighting deficiency, the Central Alarm Station (CAS) and the Secondary Alarm Station (SAS) will be notified. The officer made another personnel error by failing to notify the shift supervisor of the lighting deficiency as required by the procedure. The officer did, however, note the lighting discrepancy on the security department patrol log and the security lighting survey form.

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

Corrective action document, Condition Report 96-1971 was generated to address this concern. A memo was issued to all security personnel on December 23, 1996 stressing the requirement to adhere to plant procedures. In addition, the security officer and the supervisor were counseled.

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

Security is performing a review on their procedures in an effort to improve procedure understanding and compliance.

(4) Date When Full Compliance Will Be Achieved

Waterford 3 is in full compliance. The review of the security procedures will be completed by 12/31/97.