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Early C. Ewing, III
Director
Nuclear Safety & Regulatory Affairs
Waterford 3

W3F1-97-0154
A4.05
PR

June 23, 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 97-01
Additional Information for Violation Response

Gentlemen:

In accordance with 10CFR2.201, Entergy Operations, Inc. hereby submits in Attachment 1 the additional response for Violation 50-382/9701-02 requested in your letter received May 23, 1997.

If you have any questions concerning this response, please contact Tim Gaudet at (504) 739-6666.

Very truly yours,

E. C. Ewing
Director
Nuclear Safety & Regulatory Affairs

ECE/DMU/tjs
Attachment



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Additional Information to Violation Response

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cc: E.W. Merschoff (NRC Region IV)
C.P. Patel (NRC-NRR)
J. Smith
N.S. Reynolds
NRC Resident Inspectors Office

ATTACHMENT I

ENTERGY OPERATIONS, INC. ADDITIONAL RESPONSE TO VIOLATION 9701-02

Additional Information Requested

Your response to the second violation (50-382/9701-02) was lacking, in that, the described corrective actions were narrowly focused. Specifically, the NRC inspectors reviewed 14 plant systems and the site structures monitoring program during the Maintenance Rule Baseline Team Inspection at the Waterford-3 site. We identified five examples of inadequate monitoring. Our review was a sampling of the total inventory of Waterford-3 systems, trains, and components. Your April response letter did not address the acceptability of nonsampled systems, trains, and components. Therefore, a potential exists that the effectiveness of maintenance on other systems, trains, or components is not being monitored as required by the Maintenance Rule. Consequently, your response to the violation should address the more broader aspects of your corrective actions.

Response

In our violation response dated April 21, 1997, Waterford 3 stated that provisions would be made to monitor under 10 CFR50.65 paragraph (a)(2), the availability performance of the broad range gas monitors, PPS, CPCs and the ESF actuation system. The PSA would be reviewed and unavailability criteria established accordingly. These criteria would be reviewed and approved by the Expert Panel. The availability maintenance history of these systems would then be reviewed against their respective (a)(2) unavailability performance criteria and a system categorization made. If it is determined that (a)(1) status is warranted, then (a)(1) goals would be established.

Our response also stated that provisions would be made to monitor under 10 CFR50.65 paragraph (a)(2), the reliability performance of the lift function of the containment polar crane. The (a)(2) reliability performance criteria would be established and approved by the Expert Panel. A reliability historical review would then be performed against criteria established and system categorization made. If determined that (a)(1) status is warranted, then (a)(1) goals will be established.

In conjunction with above, a review of all plant systems was performed to ensure that (a)(2) performance criteria had been established commensurate with safety. This

review paid particular attention to areas identified in the Notice of Violation (NOV). They are (1) the adequate establishment of unavailability performance criteria for

Risk Significant and Standby Systems down to the train and channel level and (2) correct use of NUMARC 93-01 scoping criteria for all systems (both scoped and non scoped) to ensure that all appropriate systems and functions have been included in the Maintenance Rule program.

As a result of this review, two (2) additional systems where unavailability was not appropriately monitored were identified. The systems are the starting air system for the Emergency Diesel Generators (EDG) and Excore Nuclear Instrumentation (ENI). These 2 systems are in addition to those previously identified in the NOV.

For each of the 2 systems above, the PSA will be reviewed and unavailability criteria established accordingly. These criteria will be reviewed and approved by the Expert Panel. The availability maintenance history of these systems will then be reviewed against their respective (a)(2) unavailability performance criteria and a system categorization made. If it is determined that (a)(1) status is warranted, then (a)(1) goals will be established.

The additional actions addressed above will be completed by August 30, 1997. Upon completion of the above, Waterford 3 will be in full compliance.