

Entergy Operations, Inc.
P.O. Box B
Killona, LA 70066
Tel 504 739 6242

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

W3F1-97-0125
A4.05
PR

June 4, 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 97-04
Reply to Notice of Violation

Gentlemen:

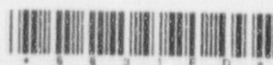
In accordance with 10CFR2.201, Entergy Operations, Inc. hereby responds to the notice of violation enclosed in the subject Inspection Report.

According to the notice of violation, our response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. Licensee Event Reports (LERs) 97-012-01, 97-010-00 and 97-001-00 meet that criterion. LER 97-012-01 adequately addresses violation 9704-01. LER 97-010-00 adequately addresses violation 9704-02 and LER 97-001-00 adequately addresses violation 9704-06. Attached for your review are LERs 97-012-01, 97-001-00 and 97-010-00.

The first violation, 9704-01, concerns a failure to comply with the Technical Specification requirements for the use of overtime. The requirements of the Technical Specification and the working hour policy have been reemphasized to management and supervisory personnel. In addition, the working hour procedure will be revised to clarify requirements. Detailed corrective actions are included in LER 97-012-01.

The second violation, 9704-02, concerns a failure to recognize that Shield Building Ventilation (SBV) Train B failed its Technical Specification surveillance for maximum air flow. Also, the surveillance review process allowed the surveillance failure to go

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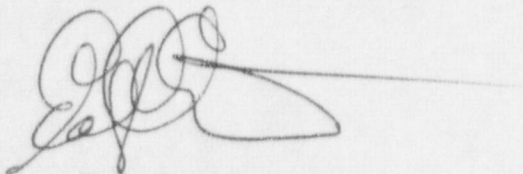
undetected greater than the Technical Specification allowed outage time. The SBV flow rate was adjusted to be within Technical Specification range and the surveillance test was re-performed. Detailed corrective actions are included in LER 97-010-00.

The third violation, 9704-06, concerns inadequate 10 CFR 50.59 evaluations which resulted in crediting an EFW Flow Control Valve for containment isolation, without having position indication as required by RG 1.97. An instance was identified which exceeded the allowed outage time of TS 3.3.3.6 "Accident Monitoring Instrumentation", resulting in a violation of the TS. The Technical Requirements Manual and the Final Safety Analysis Report were revised to address this issue. Detailed corrective actions are included in LER 97-001-00.

Waterford 3 is currently in full compliance with the requirements referenced in each violation.

Should you have any questions regarding this response, please contact me at (504) 739-6242 or Tim Gaudet at (504) 739-6666.

Very truly yours,



E.C. Ewing
Director,
Nuclear Safety & Regulatory Affairs

ECE/GCS/tjs
Attachments

cc: (w/Attachments)
E.W. Merschoff (NRC Region IV)
C.P. Patel (NRC-NRR)

(w/o Attachments)
J. Smith
N.S. Reynolds
NRC Resident Inspectors Office