

ENCLOSURE 1

NOTICE OF VIOLATION

Entergy Operations, Inc.  
Waterford Steam Electric Station, Unit 3

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

During an NRC inspection conducted from July 26 through September 5, 1998, three violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. Technical Specification 6.8.1.a requires, in part, that written procedures shall be implemented and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A, Section 6 requires that the licensee have procedures for combating emergencies and other significant events.

Off-Normal Operating Procedure OP-901-521, "Severe Weather and Flooding," Revision 2, Section E4.12 specified, in part, that: IF a Hurricane Warning is issued, THEN perform the following. Step C stated, in part: Perform the following for BOTH Emergency Diesel Generators (EDGs), ONE EDG at a time. Start EDG in accordance with OP-009-002, EMERGENCY DIESEL GENERATOR.

Contrary to the above, on September 1, 1998, at 4 p.m. (CDT), the National Weather Service issued a hurricane warning for St. Charles Parish, where Waterford 3 is located. The licensee entered Off-Normal Operating Procedure OP-901-521, but failed to perform a start of the emergency diesel generators, as required by the procedure.

This is a Severity Level IV violation (Supplement I) (50-382/9814-01).

- B. 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, Section 9 requires that the licensee have procedures for performing maintenance and providing preventive maintenance schedules for systems that can affect safety-related equipment.

Contrary to the above, from March 1985 until November 4, 1997, procedures for maintaining or providing periodic preventive maintenance for the floor and equipment drain systems, which could affect safety-related equipment, had not been developed and implemented.

This is a Severity Level IV violation (Supplement 1) (50-382/9814-03).

- C. License Condition 2.E of the Waterford Steam Electric Station, Unit 3, Operating License NPF-38, dated December 19, 1995, requires that the licensee fully implement and maintain in effect the Commission approved Physical Security Plan, including amendments and changes made pursuant to authority of 10 CFR 50.54(p).

Waterford 3 Physical Security Plan, Revision 18, Chapter 5 states, in part, "Vital area portals are locked and alarmed."

Contrary to the above, on July 21, 1998, the NRC inspectors found Door 206, a vital area portal, unloaded and not in alarm at the central alarm station. This condition had existed for approximately 1 hour.

This is a Severity Level IV violation (Supplement III) (50-382/9814-04).

For Violation A above, pursuant to the provisions of 10 CFR 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 with a copy to the Regional Administrator, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, 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 or severity level, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

The NRC has concluded that information regarding the reasons for Violations B and C above, the corrective actions taken or planned to be taken to correct the violation and prevent recurrence, and the date when full compliance will be achieved are already adequately addressed, as discussed in the attached inspection report. However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation," and send it to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice).

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must

specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Arlington, Texas  
this 9 day of October 1998