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Early C. Ewing, III  
Director  
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Waterford 3

W3F1-98-0182  
A4.05  
PR

November 19, 1998

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 50-382/98-14  
Reply to Notice of Violation

Gentlemen:

In accordance with 10CFR2.201, Entergy Operations, Inc. hereby submits in Attachment 1 the response to Violation 50-382/9814-01 identified in the subject inspection report. On November 9, 1998, Mr. P. Harrell, NRC Region IV, granted an extension until November 19, 1998, for this response.

Based upon our evaluation of the information contained in the inspection report, Waterford does not contest the violation. However, we are taking exception to some of the details provided in the discussion of the violation. Additional information to support our position is provided in the attached response.

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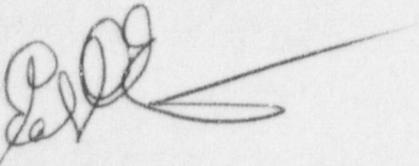
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If you have any questions concerning this response, please contact me at  
(504) 739-6242.

Very truly yours,

A handwritten signature in black ink, appearing to be 'E.C. Ewing', with a long horizontal line extending to the right.

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

ECE/BVR/ssf  
Attachment

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

ATTACHMENT 1

ENTERGY OPERATIONS, INC. RESPONSE TO VIOLATION 50-382/9814-01  
IDENTIFIED IN ENCLOSURE 1 OF INSPECTION REPORT 98-14

VIOLATION NO. 50-382/9814-01

Technical Specification 6.8.l.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 1) (50-382/9814-01).

RESPONSE

Waterford has carefully evaluated the information in Violation 9814-01 and does not contest the violation. However, this response takes exception to some of the information in the inspection report.

Because off-normal procedures are written to provide guidance under numerous circumstances, it is management's expectation that operators will prioritize the tasks in accordance with plant conditions. This expectation is represented by Section 5.16.5 of OP-100-001, which allows steps in off-normal procedures to be addressed out of sequence "IF the step is not applicable to the present plant condition."

Waterford believes the operators were following management's expectation to prioritize tasks when preparing for Tropical Storm Earl and acted in accordance with the required procedures. However, off-normal procedure OP-901-521, as written, did not clearly represent management's additional expectation to start the EDGs as soon as possible to ensure their availability. Procedure requirements included

starting, paralleling and loading the EDGs. Based on the operators' judgement regarding specific weather conditions, availability of personnel on shift, plant conditions and their conclusion that procedure requirements were excessive, the operators decided not to perform the step for testing the EDGs in the sequence explicitly required by the procedure.

#### Reason for the Violation

At approximately 1600 on September 1, 1998, a hurricane warning was issued for St. Charles Parish due to a potential for winds associated with Tropical Storm Earl (located in the Gulf of Mexico) to strengthen to hurricane force. Waterford declared an Unusual Event and entered off-normal procedure OP-901-521. Consistent with management's expectation to prioritize the work associated with preparing for the storm, Control Room personnel reviewed the actions necessary and personnel required for the upcoming steps in the procedure. As part of this review, the operators evaluated Step 12.c that required starting, paralleling and loading both EDGs in accordance with the normal operating procedure (OP-009-002, "Emergency Diesel Generators"). The operators also evaluated step 12.c within the context of OP-100-001, which provides guidance for the use of off-normal procedures (such as OP-901-521) and allows steps in a procedure to be addressed out of sequence "IF the step is not applicable to the present plant condition." In accordance with Section 5.16.5 of OP-100-001, the operators decided to postpone step 12.c for the following reasons.

- OP-901-521 required using the normal operating procedure for the diesel (OP-009-002), which could take up to 4 hours per EDG to complete. Realizing that OP-009-002 was intended for use under normal operating conditions, the operators felt that the amount of time and manpower needed to start, parallel and load each EDG was excessive and could potentially prevent the shift personnel from completing other required actions to prepare for the storm.
- Shift personnel were tending to numerous tasks to ensure the outside area of the plant was prepared if conditions should worsen.
- The Shift Supervisor was involved in several discussions that included: returning Train "A" of the Shield Building Ventilation System to operable status; security concerns from the Arkansas security department and a plant in Florida; and NRC notifications and updates.
- Watchstanders that were needed to assist with testing the EDGs were performing thorough walkdowns to verify items that were moved or stowed for the hurricane near safety-related equipment would not potentially interfere with the operation of such equipment.
- Based on information periodically received from the National Weather Service (NWS), the shift determined that adequate time was available to test the diesels if the path of the tropical storm changed towards the direction of Waterford or conditions worsened. Throughout the shift, the amount of time available to test the EDGs was evaluated upon receipt of new information from the NWS.

The above considerations indicate the Control Room staff was aware of the purpose of Step 12.c in OP-901-521. However, the excessive requirements in the procedure for paralleling and loading the EDGs required a significant amount of manpower and time that could potentially prevent the shift personnel from completing other required actions to prepare for the storm. This resulted in the operators taking actions that contradicted management's expectation that the EDGs would be tested as soon as possible.

At approximately 0500 on September 2, 1998, the need to test the EDGs was discussed with the on-coming Shift Supervisor and Operations Superintendent. The oncoming shift was informed that the step requiring the starting, paralleling and loading of the EDGs had been addressed, but not performed. The oncoming shift was also informed other actions related to the hurricane preparations were complete. The NWS cancelled the Hurricane Warning for St. Charles Parish at approximately 0800 and Operations Procedure OP-901-521 was exited prior to the new shift having an opportunity to perform the step for starting, paralleling and loading the EDGs.

#### Corrective Steps That Have Been Taken and the Results Achieved

Inspection Report 98-14 states that the guidance in OP-100-001 contained ambiguity regarding when a step was not required to be performed. Waterford does not believe this was a contributor to this event. Instead, Waterford believes off-normal procedure OP-901-521 contained excessive requirements that created an unnecessary burden on the operators and resulted in the operators postponing step 12.c. Thus, off-normal procedure OP-901-521 was revised in order to remove the excessive requirements. Since the requirement to start, parallel and load the EDGs was based upon normal operation of the EDGs, the amount of time and manpower involved in the process did not support the intent of step 12.c in OP-901-521. The intent of step 12.c is to ensure the availability of the EDGs during off-normal conditions. Therefore, the step was changed to start the EDGs and return them to standby mode. A note was also added to the procedure that allows the operators to not start the EDGs if they were tested within the previous 48 hours.

The report also states that operator familiarity with OP-901-521 was poor and training on the use of the procedure appeared to be lacking. Waterford believes the operators' considerations provided in the previous section indicate that the operators were familiar with the purpose of step 12.c in OP-901-521 and additional training is not necessary. Management's expectation that the EDGs will be tested as early as possible when prioritizing the steps in off-normal procedure OP-901-521 was clarified to Operations personnel.

Corrective Steps Which Will Be Taken to Avoid Further Violations

Waterford 3 is in full compliance. No further corrective steps are needed to avoid future violations.

Date When Full Compliance Will Be Achieved

Waterford 3 is in full compliance.