

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 on September 21 through November 1, 1997, 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 covering applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A, Section 1.c, requires that the licensee have administrative procedures for equipment control.

Administrative Procedure UNT-007-006, "Housekeeping," Revision 7, Attachment 6.5, "Housekeeping Requirements to Prevent Seismic Interactions With Operable Safety Related Equipment," requires, in part, that loose items on wheels shall be restrained by wheel locking devices.

Contrary to the above, on October 23, 1997, Administrative Procedure UNT-007-006 was not implemented in that numerous items on wheels were found in the reactor auxiliary building in areas of safety-related equipment, and the wheel locking devices were not engaged.

This is a Severity Level IV violation (Supplement I) (50-382/9722-01).

- B. 10 CFR 50.55a(f) requires, in part, that inservice testing to verify operational readiness of pumps and valves whose function is required for safety be accomplished in accordance with Section XI of the ASME Boiler and Pressure Vessel Code.

ASME Section XI, Article IWP-3000, Paragraph IWP-3112, specifies, "If it is necessary or desirable for some reason other than stated in IWP-3111 to establish an additional set of reference values, an inservice test shall first be run at the conditions of an existing set of reference values, and the results analyzed. If operation is satisfactory, a second test run at the new reference conditions shall follow as soon as practical. The results of this [second] test shall establish the additional set of reference values. Whenever an additional set of reference values is established, the reasons for doing so shall be justified and documented in the record of tests (IWP-6000)."

Contrary to the above, in May 1997, prior to recalibrating the Low Pressure Safety Injection Pump A discharge flow transmitter for a different normal operating temperature (120 versus 400°F):

- (1) Personnel failed to establish an additional set of reference values following the calibration, as soon as practical, in that the first inservice test following the calibration change was not used to determine the new set of baseline values.
- (2) Personnel failed to first operate the pump at the conditions for the existing set of reference values and analyze the results.

This is a Severity Level IV violation (50-382/9722-02) (Supplement I).

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, (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. 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. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Arlington, Texas  
this 19th day of November 1997