



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

December 3, 1997

Charles M. Dugger, Vice President
Operations - Waterford 3
Entergy Operations, Inc.
P.O. Box B
Killona, Louisiana 70066

SUBJECT: NRC INSPECTION REPORT 50-382/97-17

Dear Mr. Dugger:

Thank you for your letter of November 24, 1997, in response to our letter and Notice of Violation dated October 23, 1997. We have reviewed your reply and find it responsive to our concern about emergency operating procedures raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,

John L. Pellet, Chief
Operations Branch
Division of Reactor Safety

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

cc:
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PDR ADOCK 05000382
G PDR

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-2-

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-3-

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E-Mail report to T. Frye (TJF)
 E-Mail report to T. Hiltz (TGH)
 E-Mail report to NRR Event Tracking System (IPAS)
 E-Mail report to Document Control Desk (DOCDESK)

bcc to DCD (:E01)(IE42)

bcc distrib. by RIV:

Regional Administrator
 DRS Director
 DRP Director
 Branch Chief (DRP/D)
 Project Engineer (DRP/D)
 Branch Chief (DRP/TSS)

Resident Inspector
 DRS Deputy Director
 DRS-PSB
 MIS System
 RIV File

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12/3/97									

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E-Mail report to T. Frye (TJF)
 E-Mail report to T. Hiltz (TGH)
 E-Mail report to NRR Event Tracking System (IPAS)
 E-Mail report to Document Control Desk (DOCDESK)

bcc to DCD (~~IPAS/IE42~~)

IE 35

bcc distrib. by RIV:

Regional Administrator
 DRS Director
 DRP Director
 Branch Chief (DRP/D)
 Project Engineer (DRP/D)
 Branch Chief (DRP/TSS)

Resident Inspector
 DRS Deputy Director
 DRS-PSB
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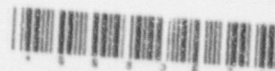
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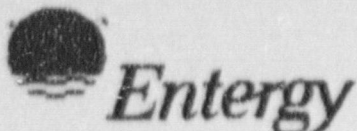
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Entergy Operations, Inc.
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Tel 504 739 6242

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

W3F1-97-0260
A4.05
PR

November 24, 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 50-382/97-17
Reply to Notice of Violation

Gentlemen,

In accordance with 10CFR2.201, Entergy Operations, Inc. hereby submits in Attachment 1 the response to the violation identified in Enclosure 1 of the subject Inspection Report.

If you have any questions concerning this response, please contact me at (504) 739-6242 or T.J. Gaudet at (504) 739-6666.

Very truly yours,

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

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

ECE/OPP/ssf
Attachment

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

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NRC Inspection Report 97-17
Reply to Notice of Violation
W3F1-97-0260
Page 2
November 24, 1997

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bcc: SRC Secretary (W-GSB-102)
T.J. Sibley (W-GSB-318)
Waterford 3 Records Center (W-GSB-100)
NRC Inspection Report 97-17
Licensing Green Folder File

ATTACHMENT 1ENTERGY OPERATIONS, INC. RESPONSE TO THE VIOLATION IDENTIFIED IN
ENCLOSURE 1 OF INSPECTION REPORT 50-382/97-17VIOLATION NO. 9717-01

Technical Specification 6.8.1.a states, in part, that written procedures shall be established, implemented, and maintained covering emergency operating procedures.

Subprocedure V, "Containment Isolation," of the licensee's Emergency Operating Procedure OP-902-008, Revision 10, contained instructions necessary to satisfy the success path for the containment isolation safety function.

The licensee had completed recent modifications to the plant, which permitted overriding a containment spray permissive signal to allow the operators to close Containment Spray Valves CS-125A(B) in order to isolate the containment and satisfy the safety function success path.

Contrary to the above, written procedures were not maintained for emergency operating procedures in that the licensee failed to revise the Emergency Operating Procedure OP-902-008 following valve modifications to provide the operators with adequate instruction for closing Containment Spray Valves CS125A(B) to isolate the Containment.

This is a Severity Level IV violation (Supplement I) (50-382/9717-01).

RESPONSE(1) Reason for the Violation

Entergy attributes the violation to a combination of the inefficient location of procedural guidance and to the lack of clearly defined management expectations for Operations in this area. Entergy agrees that appropriately located procedural guidance is needed to ensure the proper and appropriate operation of Containment Spray Valves (CS-125A(B)). The location of the procedural guidance in an Emergency Planning Procedure (EP-002-100, Revision 25, Attachment 7.12) versus in an Emergency Operating Procedure (OP-902-008) was a conscious decision, which had been reached after much deliberation. Waterford 3 is committed to meeting the strategies for Emergency Operating Procedures outlined in CEN-152, CE Emergency Operating Procedure Guidelines. The NRC approved the use of the strategies in CEN-152 Revisions 03 and 04. The strategies that CE recommends in the guidelines do not include specific steps to isolate containment in the case of equipment failure (e.g. a Containment Spray Pump

not running). The Safety Function Success Path for containment isolation in the Functional Recovery Guideline (CEN-152) states to ensure an isolation valve is closed for each containment penetration required to be closed. The Waterford 3 Safety Function Recovery Procedure (OP-902-008) states that at least one containment isolation valve must be closed for each containment penetration not in use. The EOPs are written assuming that safety-equipment is operable and will perform its intended function. To assume safety-related equipment failures in developing EOPs would drastically increase the volume of information necessary in the body of the EOPs, thus potentially increasing operator complication and response time. Based on the above considerations, we have assessed that the procedural guidance would more appropriately be located in a standard appendices to the EOPs rather than in the body of the EOPs.

It should be noted that the NRC is currently evaluating Entergy's position on the Containment Spray Containment Isolation Valves presented at the Enforcement Conference held in Arlington, Texas on July 29, 1997. Final resolution on that issue is pending. Waterford 3 will address the results accordingly.

(2) Corrective Steps That Have Been Taken and the Results Achieved

Operating crews have been briefed on the violation scenario in various Operations Department meetings and are aware of the current location of the subject procedural guidance and management's expectations in that regard.

(3) Corrective Steps Which Will Be Taken to Avoid Further Violations

Waterford 3 has plans to develop a standard appendices to the EOPs wherein guidance will be included to provide direction to the operators for closing Containment Spray Valves CS 125A(B) with Containment Spray Pumps not running. The Operator training program will include training for the Operators on the new standard appendices.

(4) Date When Full Compliance Will Be Achieved

The EOP standard appendices will be completed by June 30, 1998. Operations Training inclusion of the appendices in the training program will be completed by August 31, 1998.