



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8964

April 27, 1998

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

SUBJECT: NRC INSPECTION REPORT 50-382/98-05 AND NOTICE OF VIOLATION

Dear Mr. Dugger:

Thank you for your letter of April 9, 1998, in response to our letter and Notice of Violation dated March 12, 1998. We have reviewed your reply and find it responsive to the concerns 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,

*Blaine Murray*  
Blaine Murray, Chief  
Plant Support Branch  
Division of Reactor Safety

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

cc:  
Executive Vice President and  
Chief Operating Officer  
Entergy Operations, Inc.  
P.O. Box 31995  
Jackson, Mississippi 39286-1995

Vice President, Operations Support  
Entergy Operations, Inc.  
P.O. Box 31995  
Jackson, Mississippi 39286-1995

Entergy Operations, Inc.

-2-

Wise, Carter, Child & Caraway  
P.O. Box 651  
Jackson, Mississippi 39205

General Manager, Plant Operations  
Waterford 3 SES  
Entergy Operations, Inc.  
P.O. Box B  
Killona, Louisiana 70066

Manager - Licensing Manager  
Waterford 3 SES  
Entergy Operations, Inc.  
P.O. Box B  
Killona, Louisiana 70066

Chairman  
Louisiana Public Service Commission  
One American Place, Suite 1630  
Baton Rouge, Louisiana 70825-1697

Director, Nuclear Safety &  
Regulatory Affairs  
Waterford 3 SES  
Entergy Operations, Inc.  
P.O. Box B  
Killona, Louisiana 70066

William H. Spell, Administrator  
Louisiana Radiation Protection Division  
P.O. Box 82135  
Baton Rouge, Louisiana 70884-2135

Parish President  
St. Charles Parish  
P.O. Box 302  
Hahnville, Louisiana 70057

Mr. William A. Cross  
Bethesda Licensing Office  
3 Metro Center  
Suite 610  
Bethesda, Maryland 20814

Entergy Operations, Inc.

-3-

Winston & Strawn  
1400 L Street, N.W.  
Washington, D.C. 20005-3502



DISTRIBUTION w/copy of licensee's letter dated April 9, 1998:

DCD (IE04)

Regional Administrator

Wat-3 Resident Inspector

DRS Director

DRS Deputy Director

DRP Director

DRS-PSB

Branch Chief (DRP/D)

Project Engineer (DRP/D)

Branch Chief (DRP/TSS)

MIS System

RIV File

DRS Action Item File (98-G-0045) (Goines)

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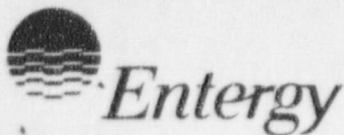
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TWD  
Entergy Operations, Inc.  
P.O. Box 8  
Kilgus, LA 70066  
Tel 504 739-6242

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

W3F1-98-0071  
A4.05  
PR

April 9, 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 98-05  
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 Tim Gaudet at (504) 739-6666.

Very truly yours,

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

ECE/GCS/ssf  
Attachment

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

98-1172

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ATTACHMENT 1

ENTERGY OPERATIONS, INC. RESPONSE TO THE VIOLATION IDENTIFIED IN  
ENCLOSURE 1 OF INSPECTION REPORT 98-05

VIOLATION NO. 9805-03

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 the authority of 10 CFR 50.54(p).

Waterford 3 Physical Security Plan, Revision 17, dated March 1996, Chapter 3, paragraph 3.2.6, "Vehicle Denial" states, in part, "Railroad derailers are installed inside the protected area on the railroad spurs that enter the site."

Plant Security Procedure PS-011-103, "Vehicle Access Control," Revision 8, Section 5. paragraph 5.6.1, states, in part, Railroad derailers are installed inside the protected area on rail spurs that allow entry into the protected area."

Plant Security Procedure PS-012-101, "Perimeter Barriers," Revision 9, Section 5.6, paragraph 5.6.1, states, "Security Officers will inspect the derailers to ensure that they are locked in the derail configuration. This check will be made twice each shift."

Contrary to the above, on February 11, 1998, the inspector identified that the derailer was not locked in the derail configuration. This degraded condition had existed since November 11, 1997.

This is a severity level IV violation (Supplement III) (382/98-05-03).

RESPONSE

(1) Reason for the Violation

The root cause for this violation is inadequate procedures, in that security procedures did not clearly define railroad derailers as security barriers and did not identify compensatory measures for a failed derailer. As a result, appropriate measures were not taken to address the deficiency.

On November 11, 1997, security personnel identified that the train derailer located in the protected area had become unattached from the rail. On the same day, security personnel generated a corrective action document, Condition Identification (CI) 313395, to have the derailer reattached to the rail.

However, security personnel failed to realize that the unattached derailler represented a failed security barrier. In consequence, the unattached derailler was not immediately repaired or compensated for within ten minutes. The derailler remained unattached and unposted until February 12, 1998.

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

The area near the unattached derailler was posted by security personnel and the derailler was repaired on February 12, 1998.

As an interim measure, the Security Information database was updated to require compensating for a failed derailler by posting security personnel. This will remain in affect until appropriate procedures are revised.

Security procedure PS-018-108, Loss or Degradation of Security Equipment and Systems, was revised on March 20, 1998, to clearly define the railroad derailler as a security barrier. The procedure was also revised to stipulate compensatory measures required when the derailler fails or is unavailable.

A security sign has been attached to the railroad derailler, identifying it as security equipment. The sign requires that security be notified prior to removal or maintenance on the derailler.

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

Security procedure PS-015-101, Security Patrols, will be revised to require Security Officers to contact the Central Alarm Station or the Secondary Alarm Station Console Operator upon discovery of a derailler deficiency. The procedure will also require the Security Officer to post the affected area until further instructions are given.

Plant administrative procedure UNT-005-002, Condition Identification, will be revised to require that security personnel be notified prior to maintenance being performed on security equipment.

(4) Date When Full Compliance Will Be Achieved

Based on the completed corrective actions for Violation 98-05-03, Waterford 3 has restored compliance to requirements. Additional corrective steps to revise procedures PS-015-101 and UNT-005-002 will be completed by June 30, 1998.