Entergy

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Early C. Ewing, III
Director
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Waterford 3

W3F1-98-0156
A4.05
PR

August 24, 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 98-09
Reply to Notice of Violation

Gentlemen:

In accordance with 10CFR2.201, Entergy Operations, Inc. hereby submits in Attachment 1 the response to the violations 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 M.K. Brandon at (504) 739-6254.

Very truly yours,

Cathy Haze for

E.C. Ewing
Director
Nuclear Safety & Regulatory Affairs

ECE/GCS/rtk
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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ATTACHMENT 1

ENTERGY OPERATIONS, INC. RESPONSE TO THE VIOLATIONS IDENTIFIED IN ENCLOSURE 1 OF INSPECTION REPORT 98-09

VIOLATION NO. 9809-01

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 requires that the licensee have administrative procedures.

Administrative Procedure OP-100-014, "Technical Specification and Technical Requirements Compliance," Revision 9, states, in part, if any system, subsystem, or component becomes unable to perform its intended safety function due to maintenance, then declare that equipment inoperable and enter the appropriate Technical Specification action.

Contrary to the above, on May 19, 1998, from 6:45 a.m. to 7:15 a.m., Administrative Procedure OP-100-014 was not properly implemented in that Emergency Diesel Generator A was not declared inoperable and the appropriate Technical Specification action was not entered when Emergency Diesel Generator A was unable to perform its intended safety function due to maintenance that resulted in a missile door protecting the diesel fuel oil tank being opened.

This is a Severity Level IV violation (Supplement 1) (50-382/9809-01).

RESPONSE

Summary of Entergy Operations, Inc. Position

EOI has carefully evaluated the information in Violation 9809-01 and agrees with the NRC's assessment of this condition as a Violation of TS 6.8.1. However, we do not agree with the characterization of the door, D270, protecting the diesel fuel oil day tank as a missile door. We also disagree that Emergency Diesel Generator A should have been declared inoperable, and that Administrative Procedure OP-100-014 was not properly implemented.

Design specification LOU-1564.742H, Special Doors, identifies D270 as a tornado door. The tornado door is designed, per specification, to withstand dead loads, thermal loads, tornado atmospheric pressure changes, tornado wind loads, and seismic loads. On the other hand, missile doors are designed to withstand the loads of a tornado door in addition to external missile loads. Waterford 3 procedure MM-006-106, Plant Door Maintenance, identifies D270 as a tornado, security, and a fire door. The procedure does not identify D270 as a missile door.

The FSAR requires that safety related and seismic Category I structures, systems, and components, such as the diesel generator fuel oil day tank, be protected against internally generated missiles. Due to the physical location of the tank, it is not vulnerable to turbine generated missiles. There are no other sources of potentially internally generated missiles in the area of the tank . Also, due to the physical location of door D270 and its surface area, the probability of it being damaged by a tornado missile has been evaluated to be extremely low as documented in Waterford 3 letter W3F1-97-0132, issued to the NRC on June 4, 1997. The probability of damage to the diesel fuel oil tank is covered in table 3, item (b) 4, Containment Escape Hatch Doors and Misc. Items. Accordingly, door D270 is not required to be a missile door.

Emergency Diesel Generator A should not have been declared inoperable and Administrative Procedure OP-100-014 was properly implemented based on the following:

- As discussed above, D270 is not a missile door, and accordingly, removal of the door did not render the components inside the room (diesel generator fuel oil day tank) inoperable due to possible damage from internally generated missiles.

- Appropriate compensatory measures were taken to address removal of the door as a security, fire, and tornado door.

    - Security personnel were posted as required by security procedure PS-011-102, Personnel Access Control.

    - Hourly fire watches were performed per procedure FP-001-015, Fire Protection System.

    - Contingency plans were made by operations personnel to declare the diesel generator inoperable in the event of a tornado watch.

Therefore, the steps in procedure OP-100-014 to declare the equipment (diesel generator) inoperable when a system or subsystem becomes inoperable were not required.

Although operations personnel took appropriate steps to address the removal of door D270, our review of the circumstances has determined that existing plant procedures do not clearly communicate to operations personnel the design requirements of doors in the plant (i.e. whether the door is a tornado, missile, or both a tornado and missile door). Guidance on door requirements was not readily available to operations personnel. Therefore, the event described in the violation represents a violation of technical specification 6.8.1.a. as a failure to have appropriate administrative procedures.

(1) Reason for the Violation

The reason for this violation is inadequate administrative procedures in that existing plant procedures do not require notification to operations personnel, for all cases, when door maintenance could affect plant operability. Specifically, rnaintenance procedure MM-006-106, which identifies the type of doors in the plant, states, in step 4.2.1 note, that "Immediate notification is required only if door out of service could affect plant operability (air-lock doors or fire protection doors)." The immediate notification is required to be made to the Shift Supervisor/Control Room Supervisor. Notification regarding missile doors or tornado doors is not required by the procedure. In addition, there currently is no guidance in operating procedures, which identifies the design requirement of doors in the plant. Therefore, the information needed by operations personnel to assess operability of plant systems and equipment as a result of door maintenance activities was not readily available to them.

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

Operations personnel have been made aware of the guidance in procedure MM-006-106 regarding the type of doors in the plant. Operations personnel are referencing this procedure when a determination of door design requirements is required.

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

Maintenance procedure MM-006-106 will be revised to require notification to the control room of type of door prior to performing maintenance.

Operations will revise appropriate operating procedure(s) to provide guidance in assessing impact of maintenance activities on doors in the plant.

(4) Date When Full Compliance Will Be Achieved

The action taken above places Waterford 3 in full compliance. Procedures MM-006-106 and the appropriate operating procedure will be revised by March 31, 1999.

VIOLATION NO. 9809-02

Technical Specification 6.8.1.f requires, in part, that written procedures shall be implemented covering Fire Protection Program implementation.

Administrative Procedure UNT-005-013, "Fire Protection Program," Revision 6, Section 5.2.1, required, in part, that impairments to the fire protection system including fire rated assemblies are controlled as specified in Procedure FP-001-015.

Fire Protection Procedure FP-001-015, "Fire Protection System Impairments," Revision 15, Attachment 8.4, "Plant Fire Doors," identified fire doors in the plant by number designation. Fire Door D150 is included in Attachment 8.4.

Contrary to the above, on May 21, 1998, Administrative Procedure UNT-005-013 was not implemented in that an impairment to Fire Door D150 was not controlled. The fire door was not closed and latched and was therefore not capable of performing its design function.

This is a Severity Level IV violation (Supplement 1) (50-382/9809-02).

RESPONSE

(1) Reason for the Violation

The cause of the failure to maintain Fire Door D150 closed and latched is inattention to detail by the last individual entering door D150, in that the individual did not ensure that the door was secured subsequent to entering it.

A contributing cause of this occurrence is the configuration of the door in its frame, in that the door is hinged such that it swings open in a direction aided by differential air pressure across the door. The differential pressure, caused by ventilation systems throughout the Reactor Auxiliary Building, has a tendency to maintain the door in an open position.

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

Door D150 was secured in its closed position.

The individual who failed to secure the door has been counseled.

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

A new door, designed to allow differential air pressure to aid in closing it, will be purchased to replace existing door D150.

(4) Date When Full Compliance Will Be Achieved

The action taken above places Waterford 3 in full compliance. D150 will be replaced by March 31, 1999.