



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

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

June 9, 1998

EA 98-310

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

SUBJECT: RESPONSE TO NRC INSPECTION REPORT 50-382/97-25

Dear Mr. Dugger:

Thank you for your letter of April 28, 1998, in response to our letter and Notice of Violation dated March 12, 1998, which identified a failure to follow procedures. We found your response to contain all of the information required by the regulations.

In your response, you denied the Violation. We have considered your denial and the information you presented in support of your position. The results of our consideration are presented below.

We have reviewed the facts provided in your response letter and noted your position that Waterford 3 personnel, prior to NRC identification, were not aware of the use of a 0.2 valve factor in the Anchor-Darling evaluation of the feedwater isolation valves. Therefore, we agree with your position that the failure to initiate a condition report did not constitute a failure to follow your condition reporting procedure. Consequently, the Violation has been withdrawn.

However, we also noted in your response letter that you stated that the failure to perform an adequate review of an addenda to the Anchor-Darling closure time analysis, performed in 1995 to support the installation of design change DC-3364, resulted in the use of an improper valve factor of 0.2 in the calculation for the closing capability of the feedwater isolation valves, and voided a previous closure time analysis which used a 0.3 valve factor. Your letter further stated that you considered this to be a missed opportunity to identify the valve factor discrepancy with these valves. The failure to adequately review this information led to a potential error in estimating the capability of the feedwater isolation valves to perform their design basis closing function. 1/0

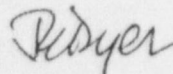
Currently we understand that you are using a 0.3 valve factor to analytically predict valve response to design basis accident conditions. This use of the 0.3 valve factor was addressed in the subject inspection report and identified as Unresolved Item 50-382/9725-03. This valve factor, did not appear to be adequately justified by the documentation that you provided to us. Based on a conference call on June 4, 1998, between Mr. Wrape and others of your staff and the NRC, we understand that you will perform an analytical model of the feedwater isolation valves based on the Electric Power Research Institute (EPRI) Performance Prediction Methodology (PPM) prior to your February 1999 refueling outage. We also understand that any

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revised operability evaluations performed as a result of these activities will be provided to Region IV for review. In addition, we also understand that you will provide documentation supplied by your vendor, Anchor-Darling, that supports the current use of a 0.3 valve factor for the feedwater isolation valves.

If our understanding is incorrect, please contact Mr. Tom Stetka of my office at (817) 860-8247.

Sincerely,



James E. Dyer
Deputy Regional Administrator

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

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

Entergy Operations, Inc.

-3-

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

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

Entergy Operations, Inc.

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