

# UNITED STATES NUCLEAR REGULATORY COMMISSION

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

October 16, 2000

Charles M. Dugger, Vice President Operations - Waterford 3 Entergy Operations, Inc. 17265 River Road Killona, Louisiana 70066-0751

SUBJECT: NRC INSPECTION REPORT NO. 50-382/00-10

Dear Mr. Dugger:

This refers to the inspection conducted on August 20 through September 30, 2000, at the Waterford Steam Electric Station, Unit 3 facility. The results of the physical security and reactor safeguards inspections were discussed on August 25, 2000, with you and other members of your staff. The remainder of the results of this inspection were discussed on October 3, 2000, with Mr. E. Ewing and other members of your staff. The enclosed report presents the results of these inspections.

These inspections examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas, these inspections consisted of selected examination of procedures and representative records, observations of activities, and interviews with personnel.

Based on the results of these inspections, two issues were evaluated under the risk significance determination process and were determined to be of very low safety significance (green). These issues have been entered into your corrective action program and are discussed in the summary of findings and in the body of the attached inspection report. These issues involved violations of NRC requirements, but because of their very low safety significance, these violations are being treated as noncited violations, consistent with Section VI.A of the Enforcement Policy. If you contest the violation or the significance of these noncited violations, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with copies to the Regional Administrator, U.S. Nuclear Regulatory Commission, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011; the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001; and the NRC Resident Inspector at Waterford Steam Electric Station, Unit 3 facility.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosures, and your response will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <a href="http://www.nrc.gov/NRC/ADAMS/index.html">http://www.nrc.gov/NRC/ADAMS/index.html</a> (the Public Electronic Reading Room).

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Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

/RA/

Linda Joy Smith, Chief Project Branch E Division of Reactor Projects

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

Enclosure:

NRC Inspection Report No. 50-382/00-10

cc w/enclosures:
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# Entergy Operations, Inc.

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RITS Coordinator (NBH)

# Only inspection reports to the following:

David Diec (DTD)

NRR Event Tracking System (IPAS)

WAT Site Secretary (AHY)

Dale Thatcher (DFT)

# DOCUMENT NAME: R:\\_WAT\2000\WT2000-10RP-TRF.wpd

RIV:RI:DRP/E	SRI:DRP/E	RI:DRS/PSB	AC:DRP/PBE	C:DRS/PSB
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# U.S. NUCLEAR REGULATORY COMMISSION REGION IV

Docket No.: 50-382

License No.: NPF-38

Report No.: 50-382/2000-010

Licensee: Entergy Operations, Inc.

Facility: Waterford Steam Electric Station, Unit 3

Location: Hwy. 18

Killona, Louisiana

Dates: August 20 through September 30, 2000

Inspectors: T. Farnholtz, Senior Resident Inspector

J. Keeton, Resident Inspector

A. Earnest, Physical Security Inspector

Accompanied By: R. Albert, Reactor Safeguards Specialist, NRR

Approved By: L. Smith, Chief, Project Branch E

**ATTACHMENTS:** 

Attachment 1: Supplemental Information

Attachment 2: NRC's Revised Reactor Oversight Process

## SUMMARY OF FINDINGS

IR05000382-00-10; on 08/02-09/30/00; Entergy Operations, Inc.; Waterford Steam Electric Station; Unit 3; Integrated Resident & Regional Report; Operability Evaluations, Event Follow-Up.

The report covers a 6-week period of inspection by resident inspectors, a regional physical security inspector, and an NRR reactor safeguards specialist. These inspections identified two green findings, both of which were noncited violations. The significance of issues is indicated by their color (green, white, yellow, or red) and was determined by the significance determination process in Inspection Manual Chapter 0609.

# **Cornerstone: Mitigating Systems**

• Green. The licensee removed Component Cooling Water System Radiation Monitor AB from service to perform maintenance and calibration. With this equipment out of service, Technical Specification 3.3.3.1 requires that samples be taken every 8 hours to detect a potential reactor coolant system to component cooling water system leak at the reactor coolant pump seal water heat exchangers. The licensee entered the technical specification but did not adequately take samples once per 8 hours as required by Action 28. The chosen sample point, allowed by procedure, was located on a dead leg and did not adequately compensate for the inoperable radiation monitor. This violation is being treated as a noncited violation, consistent with Section VI.A of the NRC Enforcement Policy and is in the licensee's corrective action program as Condition Report 2000-0988.

This issue was assessed using the reactor safety significance determination process. The inspectors found that the issue had very low safety significance because a subsequent sample showed no abnormal conditions in the component cooling water system and other radiation monitoring instruments in that system were available to detect an abnormal condition although on a delayed basis (Section 1R15).

## **Cornerstone: Physical Protection**

• Green. Licensee Event Report 00-S02-00 documented a failure to protect safeguards information. The licensee identified that significant safeguards information had been left on the site local area network for over 3 years. Procedure W5.503, "Handling of Safeguard Information," Revision 7, Section 5.15, requires that safeguards information not be processed, produced, or stored on an automatic data processing system that is connected to a local area or wide area network. This failure was identified as a noncited violation consistent with Section VI.A of the NRC Enforcement Policy and is in the licensee's corrective action program as Condition Report 2000-0524.

This issue was assessed using the physical protection significance determination process. The inspectors found that the issue had very low risk significance because there were no similar findings in the last 4 quarters (Section 4OA3).

# Report Details

<u>Summary of Plant Status</u>: The plant was operating at 100 percent power at the beginning of this inspection period and remained at that level for the entire inspection period.

## 1 REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity

# 1R04 Equipment Alignments (71111.04)

# a. <u>Inspection Scope</u>

The inspectors reviewed the mechanical and electrical alignment of Emergency Feedwater Systems A and B, which were lined up in standby while Emergency Feedwater Pump A/B was taken out of service for a routine surveillance. The alignment of critical portions of the systems were verified using Procedures OP-903-045, "Emergency Feedwater Flow Path Lineup Verification," Revision 5, and OP-009-003, "Emergency Feedwater," Revision 11.

# b. <u>Issues and Findings</u>

There were no findings identified during this inspection.

#### 1R05 Fire Protection (71111.05)

## .1 Tours and Assessments

# a. <u>Inspection Scope</u>

The inspectors conducted tours and assessed the material condition of the active and manual fire suppression systems in the following areas:

- Turbine generator building.
- Fuel handling building +46-foot elevation. New fuel receipt inspection activities were in progress in this area.
- Reactor auxiliary building and wing.

## b. Issues and Findings

There were no findings identified during this inspection.

# .2 Fire Brigade Readiness

# a. Inspection Scope

The inspectors observed a planned, announced fire drill to assess the readiness of the fire brigade. The simulated fire was on the +46-foot level of the reactor auxiliary building. The fire brigade members assembled at the designated fire locker on the

+21-foot level of the reactor auxiliary building. The inspectors observed the fire brigade members dressing out and assembling their equipment. The members then went to the scene of the fire.

# b. Issues and Findings

There were no findings identified during this inspection.

# 1R06 Flood Protection Measures (71111.06)

## a. <u>Inspection Scope</u>

The inspectors reviewed the status of the external flood protection measures for the nuclear plant island structure. The inspectors reviewed the Final Safety Analysis Report, toured the areas susceptible to flooding with the responsible engineers, and interviewed the engineers to determine the extent of any concerns for health of the flood protection measures and their understanding of the risk associated with external flooding. The inspectors reviewed the inspection and preventive maintenance instructions contained in Procedure MM-006-106, "Plant Door Maintenance," Revision 4, along with the most recent surveillance procedures performed for the flood doors. The inspectors also verified that flood protective actions required by operators could reasonably be achieved.

# b. <u>Issues and Findings</u>

There were no findings identified during this inspection.

## 1R12 Maintenance Rule Implementation (71111.12)

#### a. <u>Inspection Scope</u>

The inspectors reviewed the maintenance rule data for the following to determine if the maintenance rule scope for these systems had been appropriate:

- <u>Control Room Ventilation</u> The review considered the status of the control room heating, ventilation, and air conditioning envelope. The inspectors reviewed the maintenance history and verified that the (a)(1) category was appropriate based on maintenance preventable functional failures. The inspectors also assessed the recovery plan goals for this system.
- Startup Transformers Maintenance was performed on the Train B 4 kV and 6.9 kV supply breakers, which made the startup transformer unavailable. The inspectors reviewed the maintenance rule scope, unavailability criteria, and reliability criteria for these components. Also, the maintenance rule functions for this system were assessed.
- <u>Auxiliary Component Cooling Water Header A Component Cooling Water Heat</u>
   <u>Exchanger Outlet Temperature Control Valve ACC-126A</u> This valve failed to
   operate correctly during this inspection period and required corrective

maintenance. The inspectors interviewed the responsible engineer to assess the adequacy of the repair efforts and the determination of the cause of failure.

# b. <u>Issues and Findings</u>

There were no findings identified during this inspection.

## 1R13 Maintenance Risk Assessment and Emergent Work Evaluation (71111.13)

# a. <u>Inspection Scope</u>

The inspectors reviewed:

- Work Control Package MAI 419591 for maintenance on Charging Pump B to determine the extent of work planned and that appropriate risk assessments had been considered in accordance with Procedures UNT-005-040, "Control of Work," Revision 1, and PLG-009-007, "Routine Scheduling of Station Activities," Revision 7. The inspectors also reviewed the technical specifications to verify that the licensee had complied with these requirements throughout the duration of the maintenance activity.
- Maintenance Action Item 420978, which was generated to perform corrective maintenance on the Auxiliary Component Cooling Water Header A Component Cooling Water Heat Exchanger Outlet Temperature Control Valve ACC-126A. This valve failed during the inspection period.

# b. <u>Issues and Findings</u>

There were no findings identified during this inspection.

# 1R15 Operability Evaluations (71111.15)

# .1 Wet Cooling Tower Basin Temperature

# a. <u>Inspection Scope</u>

The inspectors reviewed the Engineering Evaluation (EC-193-037, Revision 4, Change Number 2) that increased the administrative limit for maximum wet cooling tower basin temperature from 86.4°F to the technical specification limit of 89°F. This became necessary because of an excessively high wet bulb temperature condition that was experienced on site on August 31, 2000. The inspectors interviewed the responsible engineering personnel to assess the methodology and reasoning for this effort.

# b. <u>Issues and Findings</u>

There were no findings identified during this inspection.

# .2 Component Cooling Water System Samples

# a. Inspection Scope

The inspectors reviewed the actions implemented to take technical specification required samples of the component cooling water system at a time when Component Cooling Water System Radiation Monitor AB was out of service for maintenance and calibration.

# b. <u>Issues and Findings</u>

On August 20, 2000, the licensee removed Component Cooling Water System Radiation Monitor AB from service for maintenance and calibration. In this condition, Technical Specification 3.3.3.1 requires that samples be taken every 8 hours to compensate for this inoperable instrument. The samples were normally taken from Component Cooling Water System Radiation Monitor AB itself since sample flow was still present. The Component Cooling Water System Radiation Monitor AB samples water in the AB return header of the component cooling water system downstream of the reactor coolant pump seal water heat exchangers. The instrument detects possible leakage from the reactor coolant system into the component cooling water system at the reactor coolant pump seal water heat exchangers.

Sometime between declaring the radiation monitor inoperable on August 20 and day shift on August 23, the licensee isolated the flow to the radiation monitor because of the maintenance being performed. The exact time of this action could not be determined. With no flow to the monitor, the samples required by Technical Specification 3.3.3.1 were obtained from the Component Cooling Water Pump AB discharge. Procedure CE-003-510, "Technical Specification Action Statement Compliance," Revision 0, identified this alternate sample point. At approximately 5 p.m. on August 24, a technician collecting the sample questioned the validity of the sample because of the location of the alternate sample point. Also, Component Cooling Water Pump AB was not operating at the time of the sample.

The licensee investigated these concerns and determined that this alternate sample point was not adequate in that it did not meet the intent of Technical Specification 3.3.3.1, Action 28, which required that grab samples be taken every 8 hours. Specifically, with Component Cooling Water Pump AB secured, the sample was obtained from a dead leg. The inspectors assessed this issue using the reactor safety significance determination process. The inspectors found that the issue had very low safety significance because a subsequent sample showed no abnormal conditions in the component cooling water system and other radiation monitoring instruments in that system were available to detect an abnormal condition although on a delayed basis. This violation is being treated as a noncited violation, consistent with Section VI.A of the NRC Enforcement Policy and is in the licensee's corrective action program as Condition Report 2000-0988 (NCV 50-382/0010-01).

## 1R19 Postmaintenance Testing (71111.19)

#### a. Inspection Scope

The inspectors reviewed the postmaintenance testing activities conducted on:

- <u>Auxiliary Component Cooling Water Header A Component Cooling Water Heat</u>
   <u>Exchanger Outlet Temperature Control Valve ACC-126A</u> The postmaintenance testing was performed following completion of Maintenance Action Item 420978.
- Spent Fuel Pool Heat Exchanger Temperature Control Valve CC-620 This
  valve failed during this inspection period, which required corrective maintenance
  to be performed. The postmaintenance testing included the performance of
  Operations Procedure OP-903-118, "Primary Auxiliaries Quarterly In Service
  Test (IST) Valve Tests," Revision 6.

# b. <u>Issues and Findings</u>

There were no findings identified during this inspection.

# 1R22 Surveillance Testing (71111.22)

# a. <u>Inspection Scope</u>

The inspectors observed:

- Setup for and portions of a scheduled surveillance test of Component Cooling Water Makeup Pump A. The test was conducted in accordance with Operating Procedure OP-903-129, "Component Cooling Water Makeup Pump Operability Check," Revision 1. The inspectors also reviewed Attachment 10.1, "Component Cooling Water Makeup Pump A IST Data," and verified that the surveillance acceptance criteria had been met.
- Portions of the scheduled surveillance testing of the control element assemblies.
   The testing was conducted in accordance with Procedures OP-903-005, "Control Element Assembly Operability Check," Revision 9, and OP-004-004, "Control Element Drive," Revision 8.
- Portions of the new fuel receipt inspection activities conducted in accordance
  with Procedure RF-002-001, "Fuel Receipt," Revision 7. The inspectors
  observed removal of the new fuel assemblies from the shipping containers,
  inspection of the new fuel, and placement of the new fuel assemblies into the
  spent fuel pool for storage until the refueling outage.

#### b. Issues and Findings

There were no findings identified during this inspection.

#### 3 SAFEGUARDS

Cornerstone: Physical Protection (PP)

# 3PP1 Access Authorization (71130.01)

# a. <u>Inspection Scope</u>

The inspectors:

- Reviewed licensee event reports and safeguards event logs to identify problems in the access authorization program.
- Reviewed procedures, audits, and self assessments of the following programs/areas: behavior observation, access authorization, fitness-for-duty, supervisor and escort training, and requalification training.
- Interviewed five supervisors/managers and four individuals who had escorted visitors into the protected and/or vital areas to determine their knowledge and understanding of their responsibilities in the behavior observation program.
- Reviewed condition reports, licensee event reports, safeguards event logs, audits, selected security event reports, and self-assessments for the licensee's access authorization program to determine the licensee's ability to identify and resolve problems.

# b. <u>Issues and Findings</u>

There were no findings identified during this inspection.

# 3PP2 Access Control (71130.02)

# a. <u>Inspection Scope</u>

The inspectors:

- Reviewed licensee event reports and safeguards event logs to identify problems with access control equipment.
- Reviewed procedures and audits for testing and maintenance of access control equipment and for granting and revoking unescorted access to protected and vital areas.
- Interviewed security personnel concerning the proper operation of the explosive and metal detectors, x-ray devices, and key card readers.

- Observed licensee testing of access control equipment and the ability of security personnel to control personnel, packages, and vehicles entering the protected area.
- Reviewed procedures to verify that a program was in place for controlling and accounting for hard keys to vital areas.
- Reviewed the licensee's process for granting access to vital equipment and vital areas to authorized personnel having an identified need for that access.
- Reviewed condition reports, licensee event reports, safeguards event logs, audits, selected security event reports, and self-assessments for the licensee's access control program in order to identify the licensee's ability to identify and resolve problems with the access control program.
- Interviewed key security department and plant support personnel to determine their knowledge and use of the corrective action reports and resolution of problems regarding repair of security equipment.

# b. <u>Issues and Findings</u>

There were no findings identified during this inspection.

# 3PP3 Response to Contingency Events (71130.03)

## a. Inspection Scope

The inspectors reviewed the following documents:

- Waterford 3 "Physical Security Plan," Revision 19, Changes 2 and 3,
   Waterford 3 "Training and Qualification Plan," Revision 6, Changes 2, 3, and 4,
   and Waterford 3 "Safeguards Contingency Plan," Revision 2, Changes 3 and 4,
   to determine if requirements of 10 CFR 50.54(p) had been met.
- Safeguards event logs and interviewed security personnel to determine their knowledge and use of the corrective action program and resolution of problems as it relates to making changes to the licensing documents.

# b. Issues and Findings

There were no findings identified during this inspection.

# 4 OTHER ACTIVITIES (OA)

## 4OA1 Performance Indicator Verification (71151)

.1 <u>Safety System Unavailability - High Pressure Injection System</u>

#### a. Inspection Scope

The inspectors reviewed the performance indicator data for Safety System Unavailability -High Pressure Injection System. This performance indicator is included in the mitigating systems cornerstone.

# b. Issues and Findings

There were no findings identified during this inspection.

# .2 Collection and Submittal of Performance Indicator Data

#### a. Inspection Scope

The inspectors reviewed the program for collection and submittal of performance indicator data. Specifically, a random sampling of security event logs and corrective action reports were reviewed for the following program areas:

- Fitness-for-duty program performance
- Access authorization program performance
- Perimeter detection system performance
- Assessment aids system performance

# b. <u>Issues and Findings</u>

There were no findings identified during this inspection.

# 4OA3 Event Follow-up (71153)

## .1 (Closed) Licensee Event Report 00-S02-00: Loss of Control of Safeguards Information

On May 24, 2000, the licensee discovered that a document containing significant safeguards information was on the site's local area network system. The information had been on the system since February 4, 1997. Procedure W5.503, "Handling of Safeguard Information," Revision 7, Section 5.15, states that safeguards information may not be processed, produced, or stored on an automatic data processing system that is connected to a local area network or a wide area network. The licensee's corrective action included training all personnel with access to safeguards information, searching and ensuring that there was no further safeguards information on the local area network, and issuing a memorandum to all personnel with access to safeguards information to enforce the procedural requirement. This violation was processed through the physical protection significance determination process, which indicated that the violation had very low risk significance because it was a human error that had not been repeated during the previous four quarters. This violation is being treated as a noncited violation consistent with Section VI.A of the NRC Enforcement Policy and is in

the licensee's corrective action program as Condition Report 2000-0524 (NCV 50-382/0010-02).

# .2 (Closed) Licensee Event Report 00-S01-00: Safeguards System Vulnerability

On March 15, 2000, severe and dangerous weather forced the licensee to suspend response to perimeter alarms for 24 minutes. The licensee established compensatory measures at all doors leading into vital areas for that time frame. The protected area was searched after the 24 minute period. The camera system remained operable and indicated that all alarms that were received were weather related.

# .3 (Closed) Licensee Event Report 00-S03-00: Safeguards Computer Vulnerability

On June 8, 2000, the licensee discovered that a security computer emergency mode software flag was incorrectly enabled in the security system database. The flag allowed unfettered access to vital areas during emergencies and exercises and was enabled by giving the command to initiate accountability card readers. Upon giving the command to turn off the accountability card readers, the security computer should have returned all exercise personnel to their normal pre-exercise access levels. The access was not returned to normal. The licensee corrected the software problem and ensured that no personnel had entered any vital areas for which they did not have normal access. This issue was entered into the licensee's corrective action program as Condition Report 2000-0595.

# 4OA5 Other

## a. Inspection Scope

The inspectors completed the following inspection elements in order to determine if the licensee was meeting regulatory and physical security plan requirements:

- Reviewed the compensatory measures employed as a result of findings in Inspection Report 50-382/00-03.
- Reviewed the progress of defensive strategy corrective actions implemented as a result of Confirmatory Order EA-00-093 dated August 4, 2000.

# b. <u>Issues and Findings</u>

There were no findings identified during this inspection.

#### 4OA6 Meetings

# **Exit Meeting Summaries**

.1 The inspectors presented the inspection results to Mr. C. M. Dugger, Vice President, Operations, and other members of licensee management at the conclusion of the inspection on August 25, 2000. The licensee acknowledged the findings presented.

The inspector asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

.2 The resident inspectors presented the inspection results to Mr. E. Ewing, General Manager, Plant Operations, and other members of licensee management at the conclusion of the inspection on October 3, 2000. The licensee acknowledged the findings presented.

The inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

#### **ATTACHMENT 1**

# PARTIAL LIST OF PERSONS CONTACTED

# Licensee

- B.S. Allen, Director, Engineering
- J. R. Douet, Manager Plant Maintenance
- C. M. Dugger, Vice-President, Operations
- E. C. Ewing, General Manager, Plant Operations
- R. M. Fili, Manager, Quality Assurance
- C. Fugate, Manager, Technical Support
- T. P. Lett, Superintendent, Radiation Protection
- J. M. O'Hern, Manager, Training and Emergency Planning
- E. P. Perkins, Jr., Director, Nuclear Safety Assurance
- J. A. Ridgel, Manager, Plant Maintenance
- L. N. Rushing, Manager, System Engineering
- B. Thigpen, Director, Planning and Scheduling

# **NRC**

G. M. Good, Chief, Plant Support Branch, RIV

# ITEMS OPENED, CLOSED, AND DISCUSSED

# **Opened**

50-382/00010-01	NCV	Failure to meet the requirements of Technical Specification 3.3.3.1 (Section 1R15).
50-382/00010-02	NCV	Inadequate protection of Safeguards Information (Section 4OA3).
Closed		
50-382/0010-01	NCV	Failure to meet the requirements of Technical Specification 3.3.3.1 (Section 1R15).
50-382/0010-02	NCV	Inadequate protection of Safeguards Information (Section 4OA3).
50-382/00-S01-00	LER	Safeguards System Vulnerability (Section 4OA3).
50-382/00-S02-00	LER	Loss of Control of Safeguards Information (Section 4OA3).
50-382/00-S03-00	LER	Safeguards Computer Vulnerability (Section 4OA3).

# **LIST OF ACRONYMS USED**

CFR	Code of Federal Regulations
LER	licensee event report
NCV	noncited violation
NRC	Nuclear Regulatory Commission

NRR Office of Nuclear Reactor Regulation

PDR Public Document Room

# **DOCUMENTS REVIEWED**

UNT-007-059, Rev. 1 Foreign Material Exclusion

PLG-009-005, Rev. 3 (1995) Outage Planning and Controls

PLG-009-007, Rev. 7 Routine Scheduling of Station Activities

UNT-005-003, Rev. 16 Clearance Requests, Approval, and Release

UNT-005-012, Rev. 6 Repetitive Task Program

UNT-005-013, Rev. 8 Fire Protection Program

UNT-005-020, Rev. 3 Post Maintenance Testing

UNT-005-040, Rev. 1 Control of Work

Waterford-3 Physical Security Plan, Revision 19, Changes 2 and 3

Waterford-3 Training and Qualification Plan, Revision 6, Changes 2, 3, and 4

Waterford-3 Safeguards Contingency Plan, Revision 2, Changes 3 and 4

Safeguards Event Logs from August 21, 1999, to August 21, 2000

Entergy Departmental Procedure CS-DP-102, "Personnel Access Control," Revision 17

Entergy Departmental Procedure CS-DP-104, "Unescorted Access Authorization," Revision 0

Security Procedure OM-106, "Unescorted Access Authorization Program," Revision 3

Self Screening Contractor Audits, NEI 2000-002, NEI VA99-013, NEI VN-5240A-99A, NEI IO81-A-001, NEI 99-044VA, NEI W120-14

Entergy Fitness-For-Duty Audit, SA-99-036.1

Safeguards Information Lesson Plan, W5.503

Fitness-For-Duty Six Month Report, dated February 4, 2000

Condition Reports, CR-WF3-2000-0446, CR-WF3-2000-0250, CR-WF3-2000-0258, CR-WF3-2000-0263, CR-WF3-2000-0279, CR-WF3-2000-0595

## ATTACHMENT 2

#### NRC'S REVISED REACTOR OVERSIGHT PROCESS

The federal Nuclear Regulatory Commission (NRC) revamped its inspection, assessment, and enforcement programs for commercial nuclear power plants. The new process takes into account improvements in the performance of the nuclear industry over the past 25 years and improved approaches of inspecting safety performance at NRC licensed plants.

The new process monitors licensee performance in three broad areas (called strategic performance areas): reactor safety (avoiding accidents and reducing the consequences of accidents if they occur), radiation safety (protecting plant employees and the public during routine operations), and safeguards (protecting the plant against sabotage or other security threats). The process focuses on licensee performance within each of seven cornerstones of safety in the three areas:

Reactor Safety	Radiation Safety	Safeguards
<ul><li>Initiating Events</li><li>Mitigating Systems</li><li>Barrier Integrity</li><li>Emergency Preparedness</li></ul>	<ul><li>Occupational</li><li>Public</li></ul>	•Physical Protection

To monitor these seven cornerstones of safety, the NRC used two processes that generate information about the safety significance of plant operations: inspections and performance indicators. Inspection findings will be evaluated according to their potential significance for safety, using the significance determination process, and assigned colors of GREEN, WHITE, YELLOW or RED. GREEN findings are indicative of issues that, while they may not be desirable, represent very low safety significance. WHITE findings indicate issues that are of low to moderate safety significance. YELLOW findings are issues that are of substantial safety significance. RED findings represent issues that are of high safety significance with a significant reduction in safety margin.

Performance indicator data will be compared to established criteria for measuring licensee performance in terms of potential safety. Based on prescribed thresholds, the indicators will be classified by color representing varying levels of performance and incremental degradation in safety: GREEN, WHITE, YELLOW, or RED. GREEN indicators represent performance at a level requiring no additional NRC oversight beyond the baseline inspections. WHITE corresponds to performance that may result in increased NRC oversight. YELLOW represents performance that minimally reduces safety margin and requires even more NRC oversight. RED indicates performance that represents a significant reduction in safety margin but still provides adequate protection to public health and safety.

The assessment process integrates performance indicators and inspection so the agency can reach objective conclusions regarding overall plant performance. The agency will use an Action Matrix to determine in a systematic, predictable manner which regulatory actions should be taken based on a licensee's performance. The NRC's actions in response to the significance (as represented by the color) of issues will be the same for performance indicators as for inspection findings. As a licensee's safety performance degrades, the NRC will take more and increasingly significant action, which can include shutting down a plant, as described in the Action Matrix.

More information can be found at: http://www.nrc.gov/NRR\OVERSIGHT\index.html.