

INSPECTION RECORD

Region III

Inspection Report No. 2015-001

License No. 21-08606-08

Docket No. 030-15263

Licensee: Entergy Nuclear Operations, Inc. Palisades Nuclear Plant

Location Inspected: 27780 Blue Star Memorial Highway Covert, MI 49043

Licensee Contact: Mike Ginzler, Radiation Safety Officer (RSO) Telephone No. 269-764-3089

Program Code: 03219

Priority: 3

Type of Inspection: () Initial (X) Routine (X) Announced
() Special () Unannounced

Last Inspection Date: September 26, 2011

Date of This Inspection: May 14, 2015, with continuing in-office review through September 16, 2015

The in-office review included receipt and review of information that was unavailable during the onsite inspection, including actions to ensure that the NRC license contains the name of the individual serving as the Radiation Safety Officer.

Next Inspection Date: May 14, 2018 (X) Normal () Reduced

Justification for reducing the routine inspection interval: N/A

Summary of Findings and Actions:

- () No violations cited, clear U.S. Nuclear Regulatory Commission (NRC) Form 591 or regional letter issued
- () Non-cited violations (NCVs)
- () Violation(s), Form 591 issued
- (x) Violation(s), regional letter issued
- () Follow-up on previous violations

Inspector John G. Cassidy, Senior Health Physicist

/RA/
Signature

Date 9/28/2015

Inspector Robert G. Gattone, Jr., Senior Health Physicist

/RA/
Signature

Date 9/28/2015

Approved Aaron T. McCraw, Chief, MIB

/RA/
Signature

Date 9/28/2015

PART I – LICENSE, INSPECTION, INCIDENT/EVENT AND ENFORCEMENT HISTORY

1. AMENDMENTS AND PROGRAM CHANGES SINCE LAST INSPECTION:

<u>AMENDMENT #</u>	<u>DATE</u>	<u>SUBJECT</u>
14	4/23/2012	Renewal
15	8/20/2015	Amendment to authorize possession and storage only until termination of the license, and update the name of the RSO

2. INSPECTION AND ENFORCEMENT HISTORY:

The last inspection of this licensee was on September 26, 2011. No violations of NRC requirements were identified.

3. INCIDENT/EVENT HISTORY:

There have been no incidents or reportable events since the last inspection. No principal activities were performed since the last inspection.

PART II – INSPECTION DOCUMENTATION

1. ORGANIZATION AND SCOPE OF PROGRAM:

The licensee operated a nuclear power plant located in Covert, Michigan. The licensee was authorized to repair, modify, maintain, inspect, test, and decontaminate reactor equipment and components, and analyze reactor samples at temporary jobsites. Historically, the licensee designated the temporary jobsite at Consumer Energy Laboratory Services (laboratory), an outside company, where principal activities would be performed under direct supervision of licensee personnel. Laboratory personnel performing licensed activities were trained as radiation workers under this license prior to performing principal activities.

2. SCOPE OF INSPECTION:

Inspection Procedure(s) Used: 87126

Focus Areas Evaluated: 02.01-02.07

3. INDEPENDENT AND CONFIRMATORY MEASUREMENTS:

No independent measurements were taken because no principal activities were performed since June 4, 2008. As such, the inspectors reviewed the process that would be used to conduct principal activities. The inspectors determined that the process would include a survey of equipment prior to transport to ensure that it had no removable contamination. In addition, surveys of laboratory areas were performed after service to confirm the facilities were not contaminated.

As a result of this inspection, the licensee requested a license amendment to place the license in standby pending license termination and update the license to change the name of the individual serving as the licensee's RSO.

4. VIOLATIONS, NCVs, AND OTHER SAFETY ISSUES:

Violation 1

The inspectors identified that the RSO named in Condition 12 of the Part 30 license left the organization before this inspection. The inspectors determined that between May 11, 2013, and June 4, 2015, an individual who was technically qualified to be the RSO served as the RSO; however, the licensee failed to submit a request to amend the license to change the name of the RSO in Condition 12 of the license.

Condition 12 of NRC License No. 21-08606-08, Amendment No. 14, authorizes a specifically named individual to fulfill the duties of the Radiation Safety Officer (RSO) for the license.

Contrary to the above, between May 11, 2013, and June 4, 2015, the named individual, specifically authorized by Condition 12 of the license to fulfill the duties and responsibilities as RSO, was no longer employed by the licensee and did not fulfill the duties and responsibilities of the RSO. Specifically, the RSO had left the employ of the licensee on May 10, 2013; since that time, the licensee had not notified the NRC nor submitted an amendment request to name the new individual who was performing the duties and responsibilities of the RSO, and who was determined by the NRC to be technically qualified, on the license.

This is a Severity Level IV violation (Section 6.3).

The inspectors determined that the cause of the violation was attributed to the fact that this was the only facility within the Entergy Nuclear Power fleet that had a Part 30 license. Consequently, the licensee failed to appreciate the distinct licensing differences for this facility and failed to submit a license amendment request to change Condition 12 of the license incident to the RSO change.

As corrective actions, on June 4, 2015, the licensee requested the NRC to amend its license to place the license in Standby pending license termination. The licensee also requested the NRC to revise Condition 12 of the license to change the name of the RSO. On August 20, 2015, the NRC issued Amendment 15 of the license to limit authorized use to possession and storage only until termination of the license and to change the name of the RSO in Condition 12.

Violation 2

10 CFR 30.36(d) requires, in part, that licensees provide notification to the NRC in writing within 60 days of any of the following occurrences: (1) The license has expired; (2) The licensee has decided to permanently cease principal activities at the entire site or in any separate building or outdoor area that contains residual radioactivity such that the building or outdoor area is unsuitable for release in accordance with NRC requirements; (3) No principal activities under the license have been conducted for a period of 24 months; or (4) No principal activities have been

conducted for a period of 24 months in any separate building or outdoor area that contains residual radioactivity such that the building or outdoor area is unsuitable for release in accordance with NRC requirements.

Contrary to the above, as of June 4, 2010, no principal activities under the license had been conducted for a period of 24 months, and the licensee failed to notify the NRC in writing within 60 days of that occurrence.

The cause of the violation was attributed to licensee unfamiliarity with the requirements of 10 CFR Part 30.

As corrective actions, the licensee requested the NRC to amend the license to authorize standby pending license termination. On August 20, 2015, the NRC issued Amendment Number 15 of the license to limit authorized activities to possession and storage only until termination of the license.

5. PERSONNEL CONTACTED:

Terry Davis - Senior Staff Technical Specialist

Barb Dotson - Regulatory Assurance Specialist

^*Mike Ginzle – RSO

*Otto Gustafson - Regulatory Assurance and Performance Improvement Director

*Jeff Hardy - Regulatory Assurance Manager

Doug Watkins – Radiation Protection Manager

* Participated in preliminary telephonic exit meeting on 8/25/15

^ Participated in final telephonic exit meeting on 9/16/15

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