



GULF STATES UTILITIES COMPANY

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U.S. Nuclear Regulatory Commission
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Gentlemen:

River Bend Station - Unit 1
Docket No. 50-458/93-12

Pursuant 10CFR2.201, this letter provides Gulf States Utilities Company's (GSU) response to the Notice of Violation for NRC Inspection Report Item No. 50-458/93-12. The inspection was conducted by Messrs. A.D. Gaines and L.L. Coblenz from March 29, through April 2, 1993, of activities authorized by NRC Operating License NPF-47 for River Bend Station - Unit 1 (RBS). GSU's reply to the violations are provided in the attachments.

Should you have any questions, please contact Mr. D.N. Lorring at (504) 381-4157.

Sincerely,

J.E. Booker
Manager - Safety Assessment
and Quality Verification
River Bend Nuclear Group

Attachment

cc: U.S. Nuclear Regulatory Commission
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Arlington, TX 76011

NRC Resident Inspector
P.O. Box 1051
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ATTACHMENT 1

REPLY TO NOTICE OF VIOLATION 50-458/9312-02 LEVEL IV

REFERENCE

Notice of Violation - Letter from L.J. Callan to P.D. Graham dated April 30, 1993.

VIOLATION

Technical Specification 6.8.1 a. states, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Section 7.e.(1) of Appendix A states, in part that there should be written radiation protection procedures that cover access control to radiation areas.

Procedure RPP-0005, Revision 9B, "Posting of Radiologically Controlled Areas," Section 7.3.2.2.a. and b. states, in part, that to post to restrict access to a High Radiation Area the RP technician will post the area such that the area is completely enclosed by a physical barrier and place signs bearing the radiation symbol and the words "CAUTION" or "HIGH RADIATION AREA" on all sides of the barrier to form a conspicuous boundary.

Contrary to above, on March 31, 1993, the licensee did not post a High Radiation Area such that the area was completely enclosed by a physical barrier. Specifically, the inspectors discovered a scaffold in the 106-foot elevation of the radwaste building that could have been used to gain entry into a high radiation area that was not posted to restrict access to the area.

REASON FOR THE VIOLATION

As noted in the inspection report, the scaffold described was installed for ALARA purposes in September of 1991. Gulf States Utilities, Radiation Protection believed that the placement of the scaffold did not make accessible a portal to a high radiation area and therefore, did not establish the applicable controls for a high or very high radiation area.

Gulf States Utilities is submitting the following information to further define our reasoning for not having taken action to post the area as required to restrict access to a high radiation area:

- * GSU reviewed NUREG/CR-5569 "Health Physics Position Data Base," Section 2.5 Access Control and 2.6 Posting and Labeling, and believed that sections HPPDS-234 and HPPDS-242 supported this position.

- * Paragraph 4, Section 2.4 (External Exposure Control) in the Notice of Violation refers to a section of procedure RPP-0005 that pertains to the requirements for posting an open high radiation area. The resin processing area is a shielded cubical, which includes eight foot shield walls, an access labyrinth and a lockable expanded metal gate. This area was considered to be enclosed thus requiring only the entrances to the area to be posted.
- * The authorized entrance to this area was clearly defined and posted per procedure. Authorized entrances to high and very high radiation areas are defined by the presence of a fluorescent "tech spec monitoring required" sign. It was further defined by the presence of the proper contaminated area access posting including a step off pad and hampers. Additionally, this approved entrance is within six feet of the access ladder to the platform in question. The required posting at the entrance to the solidification facility is clearly visible to anyone who would have a need to approach the area. Even prior to reaching the base of the ladder we felt that even a careless worker's attention would be drawn to the various bright, well displayed postings and he or she would recognize the implications and take appropriate actions.
- * The access ladder to the platform was clearly posted to identify it as being a potentially hazardous area with a caution tri-foil and the words "Obtain R. P. Approval Prior to Entry." This safety instruction would also be extremely difficult for a worker to not acknowledge and was considered to be sufficient posting to restrict access to the area. Even while on the platform the remainder of the shield wall prevents inadvertent access to the area and to progress further was considered to require unreasonable measures and that industrial safety considerations would have to be disregarded.
- * When liners were processed that resulted in potential high radiation fields on top of the scaffold, access to approach the area where the scaffold was positioned was posted as a high radiation area as required.
- * Radiation Protection procedures require that personnel entering a contaminated and/or high radiation area must be authorized to enter on an approved RWP.
- * RWP 93-0001 General Access Work Permit prohibits overhead access without specific R. P. approval. These access requirements and limitations are included in radiation worker training. Also included in General Employee Training are specific hazards, precautions, and requirements pertaining to ladders and scaffolds that provide access to areas not normally surveyed or approved by R. P.
- * Radiological posting, access control requirements, prior River Bend Station violations, improvement initiatives and consequences of procedural violations make up approximately 20% of our current Initial and Requal General Employee Training. Prior to April 1993 this percentage was as high as 30% with questions pertaining to High and Very High Radiation areas being weighted.

- * The effectiveness of the shield wall was diminished by the installation of the scaffolding, in that R. P. technicians who used the platform for survey purposes were not afforded whole body shielding. The distance from the top of the platform to the top of the wall was three feet; however, this had been proven to be the ALARA method of monitoring radiation levels on liners being processed vs. actual entering the cubical.
- * As noted in the inspection report this area is not a normal travel route nor is it used to access any other area of the plant.
- * A radiation protection technician is assigned to radwaste facilities full time. Personnel desiring to work or access areas in this building are generally processed by this technician with minimal delays. Having this radiation protection technician available reduces the probability of an individual inadvertently entering the area since they could readily check with the radiation protection technician.
- * If an individual chose to ignore the implications of the postings at the authorized access, disregard the station administrative controls and training and finally climb the ladder in gross disregard for the clearly posted instructions that R. P. approval was necessary to enter, a sufficient physical barrier still existed to prevent inadvertent access. To further proceed from the top of the scaffold an individual would have to first climb to the top of the wall which is 3 feet from the top of the scaffold and supports, stand on top of a 16" wide wall with a free fall on the opposite side of eight feet, walk a six foot length of the wall without the benefit of hand holds, step over a lighting cord six to eight inches above the wall, turn, jump two feet to the top of a dryer cabinet, drop another 3' to the top of fan housing and then jump to the floor, a drop of another 43" inches. Although this is certainly not an impossible act, we felt that exceptional measures were needed to enter. The entry would be considered to be unsafe, would not be approved or considered as an authorized access and if used would not be inadvertent but rather a deliberate, determined circumvention of physical postings and barriers, and a blatant disregard for administrative controls, training, and ones own safety. Therefore, Gulf States Utilities believed that access controls to this area prevented inadvertent access to the area.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Gulf States Utilities is committed to providing a safe work environment for station workers and visitors who during the performance of their tasks must enter radiologically controlled areas. High radiation and very high radiation area postings and controls at River Bend Station have, and continue to be, paramount in the implementation of the station radiation protection program. GSU recognizes that the installed scaffold platform, utilized for ALARA purposes, did diminish the effectiveness of the shield wall in preventing access to the waste processing area. As described in the details of the inspection report, Gulf States Utilities took immediate corrective action to prevent access to the top of the wall by enclosing the top part of the scaffold platform. Additional postings were added to the wall utilizing radiological rope and "danger, very high radiation area, contaminated area above and beyond wall". A plant walkdown was conducted to ensure that all postings and controls to high and very high radiation areas

were adequate. As a result of this tour additional postings on handrails were installed. These areas required climbing over handrails and utilizing plant equipment and structures to enter the high radiation area. In one case a person could not enter the area, but could get across the parallel plane of the entrance gate below. In all cases the handrails were posted with radiation rope and "caution, high radiation area below". Full compliance with station procedures and concerns raised by the NRC inspection team was achieved by implementing these changes.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER FINDINGS

Current radiation protection procedures pertaining to posting of open high and very high radiation areas are adequate and effective. However, the current radiation protection posting procedure does not provide sufficient instruction as to what is considered to be accessible to personnel. Radiation protection procedure RPP-0005, "Posting of Radiologically Controlled Areas" will be revised to include the following.

Physical barriers around a high radiation area are required to be controlled as entrances if the area is made accessible to personnel by any of the following:

1. A portal is made available by removal of a man way cover.
2. Access to the top of or an opening in a high radiation shield wall is made accessible by the placement of a ladder or the erecting of a scaffold.

Physical barriers around a high radiation area not considered to be accessible to personnel and therefore, do not have to be controlled as entrances if exceptional measures are needed to access an opening in or on the top of a shield wall. Exceptional measures would include climbing on pipes, conduits, cable trays and other plant structures not regularly or usually used to access areas.

Amplifying information will be added to the radiation protection posting standards as necessary to further define accessible to personnel.

All radiation protection technicians and foremen will be trained on this procedure revision by June 30, 1993. Additionally this violation response and any amplifying information that is added to the radiation protection posting standards will be routed to training for inclusion into appropriate radiation protection initial and continuing training programs.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved with existing procedures when the scaffold was barricaded to prevent access.

ADDITIONAL INFORMATION

GSU believes that the described similarity depicted in the inspection report between this violation and a previous violation 458/9233-14 should be reconsidered for the following reasons:

- * The previous violation involved a ladder that in fact allowed access to a actual high radiation field. Dose rates from the top of the scaffold in question were approximately 2 mR/hr.
- * The ladder was inadvertently left in place by a radiation protection technician. The scaffold was deliberately installed in September, 1991, to address ALARA concerns. The scaffold was not used or ever considered to be used as an access to the solidification and processing area.
- * The ladder was not posted "High Radiation Area." The scaffold ladder was clearly posted "Obtain R. P. Approval Prior to Entry" and served to restrict access to the area.

ATTACHMENT 2

REPLY TO NOTICE OF VIOLATION 50-458/9312-03 LEVEL IV

REFERENCE

Notice of Violation - Letter from L.J. Callan to P.D. Graham dated April 30, 1993.

VIOLATION

10 CFR 20.203(f) requires that each container of licensed material shall bear a label identifying the radioactive contents. The label shall also provide sufficient information to permit individuals handling the containers or working in the vicinity to take precautions to avoid or minimize exposures.

Contrary to the above, on March 30 and April 1, 1993, the inspectors found two bags containing radioactive material that had not been labeled. One bag contained quick disconnects that had 3,000 dpm fixed contamination. The other contained an oil absorbent pad that had radiation levels of 25 mrad/hr of beta radiation and 26 mR/hr of gamma radiation on contact. Neither bag was labeled to provide information to permit individuals to take precautions to avoid or minimize exposures.

REASON FOR THE VIOLATION

Gulf States Utilities agrees that the material was required to meet the labeling criteria of 10CFR20 - 203(f) as well as River Bend Station Procedure RSP-0213 "Control and Handling of Radioactive Material."

Also upon discovery of the red bag containing oil absorbent pads a radiological deficiency report was generated. During the investigation it was concluded that the material in question may have been hidden from view behind the doors in the Radwaste 65' elevation for up to a month. This time period was established through discussions with radwaste operational personnel who normally change out the oil pads at the pump bases. This material was improperly disposed before all personnel who had RCA access attended the required radioactive material training classes that were conducted during the first quarter of 1993. This training specifically focused, in part, on prior material problems at River Bend Station, requirements pertaining to packaging, Radiation Protection coverage and surveys, tagging, transport and storage requirements.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Upon discovery of the material Radiological Programs surveyed, tagged, and dispositioned the radioactive material as required by station procedure. A search of other areas of the RCA revealed no additional problems associated with the identification and storage of radioactive material. River Bend Station is continuing to place emphasis on current station requirements to properly disposition radioactive material. Corrective actions already in place have been effective in significantly improving the radioactive material program at River Bend Station.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER FINDINGS

Compliance with existing Station controls and implementation of training will prevent recurrence of findings in this area.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved when the identified material was properly surveyed, tagged and dispositioned.