



ENTERGY

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R. F. Burski
Director
Nuclear Safety
Waterford 3

W3F1-94-0016
A4.05
PR

February 14, 1994

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

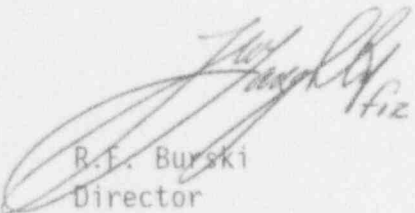
Subject: Waterford 3 SES
Docket No. 50-382
License No. NPF-38
NRC Inspection Report 93-34
Reply to Notice of Violation

Gentlemen:

In accordance with 10CFR2.201, Entergy Operations, Inc. hereby submits in Attachment 1 the response to the violation identified in Appendix A of the subject Inspection Report.

If you have any questions concerning this response, please contact C.J. Thomas at (504) 739-6531.

Very truly yours,


R.F. Burski
Director
Nuclear Safety

FB/CJT/ssf
Attachment

181144

cc: L.J. Callan (NRC Region IV), D.L. Wigginton (NRC-NRR),
R.B. McGehee, N.S. Reynolds, NRC Resident Inspectors Office

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ATTACHMENT 1

ENERGY OPERATIONS, INC. RESPONSE TO THE VIOLATION IDENTIFIED IN
APPENDIX A OF INSPECTION REPORT 93-34

VIOLATION NO. 9334-02

Technical Specification 6.8.1 requires, in part, that written procedures be established, implemented, and maintained covering the activities referenced in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Section 7.e(1) of Appendix A of Regulatory Guide 1.33 lists access to radiation areas and the implementation of an ALARA program as activities to be covered by radiation protection procedures.

Section 4.11.5 of Administrative procedure HIP-001-101, Revision 9, "ALARA Program Implementation," requires that individual employees be responsible for reading, understanding, and signing the Radiation Work Permit (RWP) and strictly adhering to RWP instructions and requirements.

Standing RWP 93000007 required that health physics personnel be contacted prior to entering radiological restricted areas. The overheads of the radiation controlled area were posted as a radiological restricted area at the entrance to the radiation controlled area .

Contrary to the above, on November 23, 1993, a maintenance technician made entries into the overhead on the +46 foot level of the radiation controlled area without contacting health physics personnel prior to making the entries.

RESPONSE

(1) Reason for the Violation

Energy Operations, Inc. admits this violation and believes that the root cause was inappropriate action in that the maintenance technician assumed incorrectly that the overhead on the +46 foot level of the radiation controlled area (RCA) was an unrestricted area. Although the +46 foot level of the RCA is generally clean, Radiation Protection (RP) has recognized that the internals of ventilation filter housings and duct work in the area may become contaminated. As a result, the overheads (defined as greater than eight feet from the floor) in that area have been designated radiological restricted areas. Furthermore, all overheads in the RCA

are designated radiological restricted areas and administrative controls have been established that require workers to contact RP prior to entering those areas. Thus, the maintenance technician acted inappropriately in that he violated administrative controls the two times he entered the overhead without first contacting RP.

A contributing cause of this event is poor communication. An RP technician at the scene observed the maintenance technician when he first entered the overhead. However, after noting the infraction, the RP technician did not clearly communicate that the overhead is a radiological restricted area and that RP should be contacted prior to entry. Consequently, the maintenance technician did not contact RP prior to entering the area a second time. Moreover, the RP technician was not present to observe the second entry due to other responsibilities in the area. If the RP technician had clearly communicated the concern to the maintenance technician, then the second inappropriate entry may have been prevented.

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

On November 23, 1993, the RP technician performed a survey to determine the contamination levels in the overhead. Survey results show that the overhead was radiologically clean at that time (e.g., loose contamination levels were less than 1,000 dpm/100 cm² and fixed contamination levels were less than 2 mrem/hr).

The maintenance technician was counseled in accordance with the Improving Human Performance Program. RP and Maintenance conducted a post job briefing to determine the consequences of this event. No contamination concerns were identified. Additionally, this event was discussed with Mechanical Maintenance personnel at the December safety meeting.

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

Three corrective steps will be taken to avoid further violations. First, discussions will be held with RP personnel to accentuate this event and to remind them to assess the radiological consequences of overhead areas before granting workers entry. Second, RP will post additional signs for entering overheads in the RCA. Finally, this event will be discussed during the February site wide safety meetings to accentuate lessons learned.

(4) Date When Full Compliance Will Be Achieved

Full compliance will be achieved by February 28, 1994.

WATERFORD 3 DOCUMENT ROUTING FORM

ILN _____
DATE 2/8/94

TITLE	ACR	INITIAL/DATE	CC	DOCNO: W3F1-94-0016 DOCDATE: <u>2-11-94</u> Subject: NRC Inspection Report 93-34
President & CEO				
Chief Operating Officer				
Vice President Operations Waterford 3	AP	<u>RS 1/16/94</u>		
•Site Administrative Programs Coordinator				
•General Manager - Plant Operations	AP	<u>SM 2/10/94</u>		To (NRC) Document Control Desk
••Operations & Maintenance Manager	AP	<u>RS 2/10/94</u>		
••Technical Services Manager	AP	<u>SM 2/10/94</u>		From: R.F. Burski (CJT)
••Planning & Scheduling Manager				
••Security & General Support Manager				
••Industrial Safety Specialist				
J.G. Hoffpauir	DR	<u>JH 2/8/94</u>		Comments/Initials:
•Director Plant Modification & Construction				
••Modification Management Supervisor				DUE TO NRC: 02/18/94 ^{6:27 2/2/94}
••Project Management Coordinator				DUE TO GMP: 02/14/94 02/11/94
••Construction Manager				
••Modification Sched. & Estimating Subv				
•Director Site Support				Resolution/initials:
••Site Business Services Manager				
••Emergency Planning & Admin Manager				
••Management Prog. & Excellence Coord.				
••Materials, Purchasing & Contracts Mgr				
•Director Nuclear Safety	SI	<u>AP 2/8/94</u>		
••Licensing Manager	AP	<u>AP 2/8/94</u>		For Regulatory Correspondence Only
••Technical Support Coordinator				TO BE COMPLETED BY THE ORIGINATOR
••Policy & Directives Coordinator				1. This document contains commitments
••Quality Assurance Manager				<input checked="" type="checkbox"/> Yes. Commitment Evaluation Form completed CJT 2/8/94
••Operational Experience Engineering Mgr.				<input type="checkbox"/> No
T.J. Gaudet	DR	<u>TJG 2/8/94</u>		2. This document will cause a change to the FSAR
•Training Manager				<input type="checkbox"/> Yes. License Document Change Request completed
••Operations Training Supervisor				<input checked="" type="checkbox"/> No
••Simulator Training Supervisor				3. This document requires validation in accordance with W4 802
••Maintenance Training Supervisor				<input checked="" type="checkbox"/> Yes. The validation process is complete
••Technical Training Supervisor				<input type="checkbox"/> Yes. However the process is incomplete
••Engrg. Training & Accred. Supervisor				<input type="checkbox"/> No
•Director Design Engineering				Licensing Concurrence:
••Safety & Engineering Analysis Manager				Return to:
••Electrical/I&C Principal Engineer				
••Mechanical/Civil Principal Engineer				
••Procurement/Programs Engineering Mgr.				
C.J. Thomas	OR	<u>CT 2/8/94</u>		
•Others:	DR	<u>SM 2/9/94</u>		Jeff Thomas #6531
J.A. Ridgel	DR	<u>JAR 2/8/94</u>		
D.E. Marpe	DR	<u>DM 2-8-94</u>		

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 AC - ACTION FI - FILE CC - COPY REQUIRED
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 CD - CROSS DISCIPLINE REVIEW OR - ORIGINATOR DOCDATE - DOCUMENT DATE Rev Date: 12/93