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U. S. Nuclear Regulatory Commission  
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Subject: Arkansas Nuclear One - Units 1 and 2  
Docket Nos. 50-313 and 50-368  
License Nos. DPR-51 and NPF-6  
Response to Inspection Report  
50-313/94-15; 50-368/94-15

Gentlemen:

Pursuant to the provisions of 10CFR2.201, attached is the response to the violation identified during the inspection of activities associated with failure to log on to a radiological work permit prior to entering a radiological controlled area.

Should you have questions or comments, please call me at 501-964-8601.

Very truly yours,

*Dwight C. Mims*  
Dwight C. Mims,  
Director, Licensing

DCM/slp

Attachments

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## NOTICE OF VIOLATION

During an NRC inspection conducted on April 11, 1994, through April 15, 1994, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10CFR Part 2, Appendix C, the violation is listed below:

Unit 1 Technical Specification 6.8.1.a requires, in part, that written procedures be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Safety Guide 33, November 1972. Safety Guide 33, Appendix A states, in part, that radiological work permits be covered by written procedures.

Unit 2 Technical Specification 6.8.1.a requires, in part, that written procedures be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33 states, in part, that radiological work permits be covered by written procedures.

Section 6.3.3.A of Procedure 1012.017, Revision 1, "Radiological Posting and Entry/Exit Requirement," states, in part, that entry requirements for entry into a radiological controlled area are such that, "when posting includes "RWP REQUIRED FOR ENTRY," then personnel must be logged on an appropriate radiological work permit."

Contrary to the above, on April 12, 1994, the licensee identified an individual who had entered a radiological controlled area which was posted, "RWP REQUIRED FOR ENTRY," and had not logged on a radiological work permit. Subsequent investigation by the licensee indicated that from February 24 through April 12, 1994, the same individual made a total of 11 entries into a radiological controlled area which was posted "RWP REQUIRED FOR ENTRY," and had not logged on a radiological work permit.

This is a Severity Level IV violation (Supplement I) (313/9415-01; 368/9415-01).

Response to violation 313/9415-01; 368/9415-01

(1) Reason for the violation:

On April 12, 1994, an Arkansas Nuclear One (ANO) contract employee was observed exiting controlled access without a self-reading dosimeter (SRD). An interview with the contractor revealed that he had dropped the SRD and made no attempt to leave controlled access or retrieve the SRD. The contractor was immediately barred from entry into controlled access.

Subsequent investigation revealed that there were multiple incidents in which the individual failed to successfully log in and out of the Entergy Radiological Information Management System (ERIMS) when entering and exiting controlled access. During follow-up interviews, the individual stated that he was aware that he had made errors but believed if he had made an error on the ERIMS, he would have been denied access at the security turnstiles into controlled access. The individual stated that he was not aware of the red lights or audible alarms which were received as a result of the incorrect transactions. The individual added that he was reluctant to seek assistance or ask questions because he did have a learning disability and was fearful he would lose his job if he appeared unable to perform the required tasks. The individual also stated that he had difficulty during his initial training.

The contract employee's training records were reviewed. It was discovered that this individual had failed the Radiation Worker written examination of General Employee Training (GET) on two occasions. On his third attempt, the individual passed the examination with the minimum score.

The root cause for this condition is inadequate radworker performance by the involved individual and his unwillingness to seek guidance or clarification when he was unsure of the proper course of action. A contributing cause was the absence of general guidance for the evaluation and retesting criteria of individuals who did not successfully pass GET.

(2) Corrective steps taken and results achieved:

On April 13, 1994, the contract employee was terminated.

A policy was implemented to address failures and retest criteria in GET. This policy outlines the guidelines that are to be followed if an individual fails to meet the minimum examination standard and limits the number of attempts to obtain the minimum examination standard. This new policy requires greater ANO management involvement for addressing failures and retesting of personnel in GET.

An assessment of radworker knowledge of ERIMS and security entry/exit requirements, procedures, and interfaces with regard to accessing radiologically controlled areas was performed. Seventy-two individuals from sixteen different departments at ANO were asked to complete a questionnaire concerning the ERIMS/Security/SRD interlock. The results of the assessment verified that the knowledge of the design and function of the ERIMS/Security/SRD turnstile interlocks appears to be adequate.

(3) Corrective steps that will be taken to prevent further violations:

GET practical factors training will be evaluated for improvements to eliminate this type of incident in the future. The evaluation will be completed by July 26, 1994.

A task force will be established to evaluate positive control measures for entry/exit into radiologically controlled areas. The task force will provide recommendations to the Radiation Protection Manager by August 1, 1994.

The Quality Assurance (QA) department will perform a follow-up surveillance during the next refueling outage (1R12) to review the effectiveness of the corrective actions. 1R12 is currently scheduled for the spring of 1995.

(4) Date when full compliance will be achieved:

Full compliance for this event was achieved on April 12, 1994, when the contract individual was barred from further entry into controlled access. Full compliance to correct the overall condition will be accomplished during the next refueling outage (1R12), scheduled for the spring of 1995, when the review of the effectiveness of the corrective actions will be performed.