

APPENDIX A

NOTICE OF VIOLATION

Entergy Operations, Inc.
River Bend Station
St. Francisville, Louisiana 70775

Docket: 50-458
License: NPF-47

During an NRC inspection conducted on April 25-29 and May 16, 1994, three violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. Technical Specification 6.12.1 requires, in part, that in lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) [20.1601(a)] of 10 CFR Part 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a high radiation area, and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP).

Contrary to the above, on April 18, 1994, the licensee identified an accessible area in the annulus steam tunnel (AST) with dose rates in excess of 100 mrem/hr which was unposted.

This is a Severity Level IV violation (Supplement IV) (458/9409-01).

- B. Technical Specification 6.12.1 requires, in part, that in lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) [20.1601(a)] of 10 CFR Part 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a high radiation area, and entrance thereto shall be controlled by requiring issuance of a RWP. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

1. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
2. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them.
3. An individual qualified in radiation protection procedures, with a radiation dose rate monitoring device, who is responsible for providing positive control over activities within the area and who shall perform periodic radiation surveillance at the frequency specified in the RWP by the health physicist.

Contrary to the above, on April 26, 1994, the inspectors identified that two separate crews of local leak rate test (LLRT) workers entered a high radiation area on April 18, 1994, without alarming dosimeters or positive control by a qualified radiation protection technician.

This is a Severity Level IV violation (Supplement IV) (458/9409-02).

- C. 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 RWPs be covered by written procedures.

Section 4.9 of Licensee Procedure RBNP-024, Revision 4, "Radiation Protection Plan," states, in part, that radiation workers shall adhere to RWP requirements knowing that repeated or willful violation is cause for discipline up to and including termination.

RWP 94-6119-17 states, in part, that all workers are to make themselves aware of current radiological conditions by: reviewing survey data, observing local postings, or by direct communication with radiation protection.

Contrary to the above, on April 26, 1994, the inspectors identified that a crew of LLRT workers self accessed into the radiological control area and began work in the AST on April 18, 1994, without reviewing applicable survey data, observing local postings, or directly communicating with radiation protection regarding the radiological conditions in the AST.

This is a Severity Level IV violation (Supplement IV) (458/9409-03).

Pursuant to the provisions of 10 CFR Part 2.201, Entergy Operations, Inc., is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555 with a copy to the Regional Administrator, Region IV, and a copy to the NRC Resident inspector at the facility that is the subject of this Notice of Violation (Notice), within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,
this 17th day of June 1994