

JUN 10 1994

Docket No. 50-416
License No. NPF-29

Entergy Operations, Inc.
ATTN: Mr. C. R. Hutchinson, Vice President
Operations - Grand Gulf
Entergy Operations, Inc.
P. O. Box 756
Port Gibson, MS 39150

Gentlemen:

SUBJECT: NRC INSPECTION REPORT NO. 50-416/94-06

Thank you for your response of April 15, 1994, to our Notice of Violation, issued on March 16, 1994, concerning activities conducted at your Grand Gulf facility.

In your response, you admitted Violation A and denied Violation B.

After careful consideration of the bases for your denial of Violation B, we have concluded, for the reasons presented in the enclosure to the letter, that the violation occurred as stated in the Notice of Violation. Your corrective actions, however, were adequate to address the basic requirement. Therefore, no further response is necessary.

We will examine the implementation of your actions to correct the violations during future inspections.

The response directed by this letter and its enclosure are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96-511.

Should you have any questions concerning this letter, please contact us.

Sincerely,



J. Philip Stohr, Director
Division of Radiation Safety
and Safeguards

Enclosure: (See page 2)

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PDR ADDCK 05000416
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Entergy Operations, Inc.

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Enclosure:
Evaluation and Conclusion

cc w/encl:

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*See attached page for original concurrence.

SEND	OFC	RII:DRSS*	RII:DRSS*	RII:DRP*	RII:EICS*	RII:ORA*				
TO	NAME	MMcNeill	TDecker	FCantrell	BUryc	CEvans				
PDR?	DATE	6/ /94	6/ /94	6/ /94	6/ /94	6/ /94				
Yes	No	COPY?	Yes	No	Yes	No	Yes	No	Yes	No

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Entergy Operations, Inc.

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SEND	OFC	R11:DRSS	R11:DRSS	R11:DRP	R11:EJCS	R11:ORA
TO	NAME	WMcNeill <i>WJ</i>	TDecker <i>TD</i>	FCantrell <i>FC</i>	BUryc <i>BU</i>	CEvans <i>CE</i>
PDR?	DATE	6/6/94	6/6/94	6/6/94	6/6/94	6/6/94
Yes	No	COPY?	Yes	No	Yes	No

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*Telephone Conference
Revised By T. Essig
NARS, NRR on 5/25/94
WJ/WR*

ENCLOSURE

EVALUATION AND CONCLUSION

On March 16, 1994, a Notice of Violation was issued for a violation identified during a routine NRC inspection. The licensee responded to the Notice on April 15, 1994. The licensee admitted one violation (Violation A) and denied the second violation (Violation B). The NRC's evaluations and conclusion regarding the licensee's denial are as follows:

Restatement of Violation B

10 CFR 20.1302(a) requires that the licensee shall make or cause to be made, as appropriate, surveys to evaluate the extent of radiation levels and radioactive materials in effluents released to unrestricted and controlled areas to demonstrate compliance with the dose limits for individual members of the public in 10 CFR 20.1301.

Contrary to the above, during the period of August 1993 to the present, the licensee allowed water to overflow from the Standby Service Water (SSW) Basin and to flow across parking lots and adjacent grounds without appropriate sampling and analyses prior to release. Licensee records indicate the last time the SSW Basin was sampled and analyzed to appropriate Lower Limits Of Detection (LLD) was during batch releases which were performed in August 1993.

Summary of Licensee's Response to Violation B

The licensee agrees that additional measures should have been implemented to assure appropriate sampling and analysis. However, the licensee states that the violation is not valid since the overflow from the SSW is released into a restricted area as identified in its Technical Specifications and not into an unrestricted or controlled area. The licensee also states that appropriate sampling and testing of the basin water and discharge are also conducted contrary to the violation statement. The licensee continues, stating that the liquid was tested to effluent levels and sediment was tested to environmental limits in October - November 1993, and after August 1993. In addition, the licensee indicates that the potential for radioactive contamination of the SSW system is from the Residual Heat Removal (RHR) heat exchanger, which has its outlet monitored for radiation.

NRC Evaluation

The licensee is correct that the overflow is designed to discharge into the restricted area as identified in the Technical Specifications. The regulations, 10 CFR 20.1003, define restricted area as "an area, access to which is limited by the licensee for the purpose of protecting individuals against undue risks from the exposure to radiation and radioactive materials." However, the overflow drains outside the protected area openly across the site and through a parking lot, and automobiles were parked in and had driven through and individuals were noted routinely walking through the potentially contaminated water without any further survey before they left the site. Once the material overflows from the basins there are no further controls to limit

the quantity of material released or to measure the concentration of material. Thus, some of the effluent material is released to an unrestricted area, and an evaluation is required in accordance with 10 CFR 20.1302(a).

When the SSW system is operated as designed, blowdown discharges are sampled and analyzed prior to batch release, and there was no unevaluated release of effluent to unrestricted areas noted for batch release operation. This includes the October - November 1993 batch releases noted in the licensee's response. However, the inspector determined that the SSW basin intermittently overflowed without the benefit of measurement or evaluation to determine compliance with 10 CFR 20.1302(a) at least during the period August 1993 to February 1994. In summary, the NRC agrees with the licensee's assessment that the potential for radiological contamination of the system is small. However, permitting the system to overflow and drain openly across the site to the sediment pond without having measurements or a documented evaluation demonstrating compliance with dose limits is not consistent with the requirements of the regulations in 10 CFR 20.1302(a).

We recognize that although the licensee denied the violation, they were proactive with respect to corrective action on this issue. To achieve this goal, the licensee has changed the analysis requirements for the SSW basin to require samples to be routinely obtained and tested for gamma-emitters to effluent limits as described in the GGNS ODCM.

NRC Conclusion

It is our position that a violation of the specified regulation occurred as stated. The licensee's corrective actions to address this issue appear to be sufficient and will be reviewed in a subsequent inspection.