



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

JUL 17 1995

EA 95-085

Entergy Operations, Inc.
ATTN: J. W. Yelverton, Vice President
Operations, Arkansas Nuclear One
1448 S.R. 333
Russellville, Arkansas 72801-0967

SUBJECT: NOTICE OF VIOLATION
(NRC INSPECTION REPORT NO. 50-313/95-12; 50-368/95-12)

This is in reference to the March 13-14 and April 17-21, 1995 special inspection at Arkansas Nuclear One (ANO). The inspection reviewed the circumstances surrounding the higher than expected radiation dose rates and accumulated exposure received during the installation of the core support assembly (CSA) in the Unit 1 reactor vessel on March 9, 1995. This event was observed by the NRC resident inspector, and a report describing the results of this inspection and the details of this event was issued on May 22, 1995. The apparent violations were the subject of a June 15, 1995 predecisional enforcement conference in the NRC's Arlington, Texas office attended by you and other Entergy Operations, Inc. (Entergy), representatives. A summary of this conference was sent to you by letter dated June 23, 1995.

Based on the information developed during the inspection and the information that you provided during the predecisional enforcement conference, the NRC has determined that violations of NRC requirements occurred. The violations, which are described in the enclosed Notice of Violation (Notice), involve planning and control of activities associated with the movement of the CSA.

In the conference, Entergy acknowledged the significance of the event and that some of the actions taken during the CSA move were inappropriate for the existing situation. Entergy identified several root and contributing causes as being significant to this event. These included: 1) Entergy failed to classify the CSA move as an infrequently performed task (which contributed to management's lack of review and oversight of the activity); 2) the task's critical elements were not recognized or communicated to personnel and were not included in field documentation; 3) control authority and communication structure were not effectively established; 4) contingency actions were not appropriately considered; and 5) task termination criteria, including what constituted termination and how it was to be accomplished, were not adequately developed.

The actual consequences of the event did not result in any personnel exceeding regulatory limits for radiation exposure. However, multiple barriers were violated which created the potential for significant exposures. The lack of management oversight of the contractor's activities, the failure to adequately establish reviews and procedural controls (including the overtime controls) for an infrequently performed evolution, and the lack of coordination between

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contract personnel and the radiation protection technicians collectively represent a breakdown in the control of licensed activities associated with the CSA move. The failure in this case represents a significant regulatory concern and, therefore, in accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," (Enforcement Policy) (60 FR 34381, June 30, 1995) these violations have been classified in the aggregate as a Severity Level III problem.

In accordance with the Enforcement Policy, a base civil penalty in the amount of \$50,000 is considered for a Severity Level III problem. Because your facility has been the subject of escalated enforcement action within the last 2 years¹, the NRC considered whether credit was warranted for *Identification* and *Corrective Action* in accordance with the civil penalty assessment process in Section VI.B.2 of the Enforcement Policy. With regard to *Identification*, while the conditions that resulted in the elevated radiation levels were self disclosing, Entergy's efforts to comprehensively review the event to determine the root causes and associated violations were noteworthy. Credit is, therefore, given to your identification efforts. With regard to *Corrective Action*, credit was warranted for your prompt and comprehensive corrective actions where you appropriately addressed each of the root causes and contributing factors. These actions included: 1) review of the refueling path potential risks and the establishment of management controls; 2) providing training awareness for radiation source potentials, fuel transfer canal water level controls in general, and heavy load requirements; 3) development of comprehensive specific job termination criteria; 4) upgrading ALARA and radiation protection plan information and incorporating it into appropriate documents; 5) development of pre-job briefing guidelines to ensure critical activities and elements are addressed; 6) upgrading of the procedures to ensure infrequently performed tasks and evolutions are appropriately identified, and; 7) broadening of management oversight for contractor interfaces to ensure common interface aspects are considered and addressed.

Therefore, to recognize and encourage prompt identification and comprehensive corrective action in response to violations, I have been authorized after consultation with the Director, Office of Enforcement, not to issue a proposed civil penalty in this case.

The NRC staff had also identified an apparent violation involving the failure to retain documentation used during the performance of preoperational checks on the polar crane. Based, in part, on the information provided during the predecisional enforcement conference, it was determined that this failure constitutes a violation of minor safety significance and is being treated as a Non-Cited Violation, consistent with Section IV of the NRC Enforcement Policy.

Entergy Operations, Inc., is required to respond to this letter and should follow the instructions specified in the enclosed Notice in preparing its

¹ Severity Level III actions were issued on December 13, 1993 (EA 93-278), April 4, 1994 (EA 94-033), September 7, 1994 (EA 94-161), and July 6, 1995 (EA 95-076).

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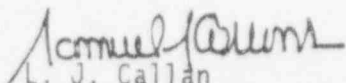
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response. In its response, Entergy should document the specific actions taken and any additional actions planned to prevent recurrence. After reviewing Entergy's response to this Notice, including its proposed corrective actions, and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure and your response will be placed in the NRC Public Document Room (PDR). To the extent possible, your response should not include any personal privacy, proprietary or safeguards information so that it can be placed in the PDR without redaction.

The response directed by this letter and the enclosed Notice 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.

Sincerely,


L. J. Callan
Regional Administrator

Docket Nos. 50-313; 50-368
License Nos. DPR-51; NPF-6

Enclosure: Notice of Violation

cc w/enclosure:
Entergy Operations, Inc.
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Entergy Operations, Inc.
ATTN: Jerrold G. Dewease, Vice President
Operations Support
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Jackson, Mississippi 39286

Wise, Carter, Child & Caraway
ATTN: Robert B. McGehee, Esq.
P.O. Box 651
Jackson, Mississippi 39205

cc w/enclosure: (See Next Page)

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Entergy Operations, Inc.

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cc w/enclosure: (Con't)
Honorable C. Doug Lunningham
County Judge of Pope County
Pope County Courthouse
Russellville, Arkansas 72801

Winston & Strawn
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Arkansas Department of Health
ATTN: Ms. Greta Dicus, Director
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Entergy Operations, Inc.

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