



**ENTERGY**

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A4.05  
QA

June 12, 1992

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 92-10  
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,

RFB/CJT/ssf  
Attachment

cc: R.D. Martin, NRC Region IV  
D.L. Wigginton, NRC-NRR  
R.B. McGehee  
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NRC Resident Inspectors Office

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ATTACHMENT 1

ENTERGY OPERATIONS, INC. RESPONSE TO THE VIOLATION IDENTIFIED IN  
APPENDIX A OF INSPECTION REPORT 92-10

VIOLATION NO. 9210-01

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, Revision 2, February 1978 lists radiation protection procedures for access to radiation areas, including a radiation work permit system.

Section 4.2.6 of Administrative Procedure UNT-005-022, "RCA Access Control," requires that radiation workers be responsible for reviewing and signing the applicable radiation work permits.

Contrary to the above, on April 15 and 16, 1992, the inspector determined that approximately 12 workers involved with unloading a transportation cask signed Radiation Work Permit (92-80), which was the wrong permit and was not applicable to the work performed.

RESPONSE

(1) Reason for the Violation

Entergy Operations, Inc. admits this violation and believes that the root cause was inattention to detail in that 7 workers involved with unloading a transportation cask signed Radiation Work Permit (RWP) 92-80, which was not appropriate for the work being performed. The 7 workers were staging and preparing a transportation cask to allow shipment of irradiated incore instrumentation for burial. This work required minimum radiological controls and was planned to be accomplished under the standing RWPs. Conversely, RWP 92-80 was prepared to cover the loading of the irradiated incore instrumentation into the transportation cask in a Zone 3 Hot Particle Area. As such, the RWP imposed radiological controls that were significantly more stringent than those imposed by the standing RWPs. Because of the contrasting radiological controls and job descriptions, the workers should have realized that RWP 92-80 was inappropriate for the work they were performing.

A contributing cause of this event involves the Health Physics Shift Control Technician (SCT). The SCT issued RWP 92-80 to the workers under the impression that the RWP was requested for review only. The SCT did not instruct the workers to utilize the RWP since he knew that the RWP covered activities scheduled for a later time. This impression is understandable given that radiation workers check a review RWPs well in advance of signing them. However, if the SCT had questioned the workers regarding their intent, then the event may have been prevented.

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

Immediately upon discovery of this event, Health Physics instructed those workers inappropriately using RWP 92-80 to exit the Radiation Controlled Area (RCA). These workers were instructed on the appropriate RWP and allowed to return to their work.

Additionally, Health Physics individually briefed those workers still onsite who inappropriately worked under RWP 92-80. These briefings were conducted to ensure worker understanding of this event and to accentuate lessons learned.

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

Three specific actions are planned to prevent recurrence. First, General Employee Radiation Worker Training will be revised to emphasize the importance of using the proper RWP and the possible consequences of using an incorrect RWP. In addition, radiation workers will be instructed on their responsibilities and actions to be taken if the RWP provided for their work seems inappropriate.

Next, Health Physics Procedures HP-001-110, "Radiation Work Permits," and HP-001-101, "ALARA Program Implementation," will be revised to require Employee Authorization whenever a RWP pre-job brief is required. These revisions will prevent radiation workers from logging into the HP computer at the RCA control point unless they have received the required pre-job brief. Finally, this event will be discussed with Health Physics personnel as part of the Continuing Training Cycle.

(4) Date When Full Compliance Will Be Achieved

Full compliance will be achieved by August 14, 1992.