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James J. Fisicaro
Director
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April 5, 1996

U.S. Nuclear Regulatory Commission
Document Control Desk
Mail Stop P1-37
Washington, D.C. 20555

Subject: Reply to Notice of Violation IR 96-06
River Bend Station - Unit 1/Docket No. 50-458

File No.: G9.5, G15.4.1

RBG-42677
RBF1-96-0085

Gentlemen:

Pursuant 10CFR2.201, please find attached Entergy Operation's response to the notice of violation described in NRC Inspection Report (IR) 96-06. The inspection was performed by Mr. Michael P. Shannon from January 26 through February 2, 1996, of activities authorized by NRC Operating License NPF-47 for River Bend Station (RBS) - Unit 1.

In the inspection report, concerns were raised about the failure to follow radiological protection procedures, involving both radiation protection personnel, as well as other plant personnel. Entergy Operations, Inc. (EOI) concurs with this violation and is also concerned about these examples of personnel failing to follow procedures. Root cause investigations were performed using event and causal factors charting and interviews. The attachment to this letter addresses the reasons for each violation example individually. Corrective actions address both the individual violation examples and your concern on the failure to follow radiological protection procedures.

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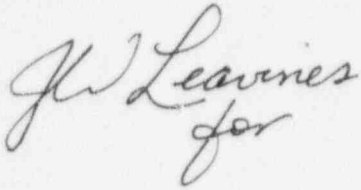
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Should you have any questions, please contact Mr. D. N. Lorring at (504) 381- 4157.

Sincerely,

Handwritten signature in cursive script that reads "J. W. Leavines for".

JJF/WJF/km
attachment

cc: U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

NRC Resident Inspector
P.O. Box 1051
St. Francisville, LA 70775

Mr. David Wigginton
U.S. Nuclear Regulatory Commission
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ATTACHMENT A

REPLY TO NOTICE OF VIOLATION IR 458/9606-01

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VIOLATION (EXAMPLE 1)

Section 6.8 of Procedure RPP-0005, Revision 10, "Posting of Radiological Controlled Areas", requires airborne radioactivity levels greater than or equal to 30 percent of the derived air concentration values listed in Appendix B, of 10 CFR 20 to be posted as "Caution or Danger, Airborne Radioactivity Area".

On January 31, 1996, the inspector identified that the reactor cavity was not posted "Caution or Danger, Airborne Radioactivity Area" from 11:00 PM on January 28th, until 7:00 AM on January 29th, 1996. During this time, air sample results from inside the reactor cavity were greater than or equal to 30 percent of the derived airborne concentration values listed in 10 CFR Part 20, Appendix B.

REASON FOR THE VIOLATION

Based on our investigation, the reason for this violation is personnel error on the part of Radiological Programs (RP) management. In developing the RP work plan for the refueling floor, the temporary existence of elevated airborne levels during movement of the reactor vessel internals could have been predicted. Also, upon receiving the results of the air survey, the RP technician should have posted the refueling floor in accordance with the procedure. The refueling floor work plan should have prevented this and revision to the work plan will prevent it in the future.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

No immediate actions were necessary for the airborne posting issue since it was identified on January 31, 1996, and air sample results reflect that River Bend Station was back in compliance with less than 30 percent of the derived airborne concentration by 7:00 AM on January 29, 1996. RP management had a briefing with RP personnel on this event and has reemphasized the importance of following procedures.

CORRECTIVE STEPS TO BE TAKEN TO AVOID FURTHER VIOLATIONS

During future outages, the 186' elevation of the refueling floor will be posted as an "Airborne Radioactivity Area" prior to movement of reactor vessel internals. Discussion of this event will be included in the upcoming RP requalification training cycle to emphasize the importance of following RP procedures.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

EOI is in full compliance.

ATTACHMENT A

REPLY TO NOTICE OF VIOLATION IR 458/9606-01

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VIOLATION (EXAMPLE 2)

Section 3.6 of Procedure RSP-0200, Revision 10, "Radiation Work Permits", states that a radiation work permit issued by radiological programs functions to ensure that the radiological hazards associated with planned work are adequately addressed by technically qualified individuals.

On February 1, 1996, the inspector identified that the radiation work permit (RWP) issued to authorize the calibration of fixed radiation monitors did not include proper radiological controls and the workers handling the radioactive sources were not qualified to establish radiological work controls.

REASON FOR THE VIOLATION

Based on our investigation, the reason for this violation was personnel error on the part of the individual who wrote RWP-96-0006-00, Rev. 0, and failed to comply with the procedural requirement.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Immediate actions included retrieving the (RT-10 and RT-11) sources from Instrumentation and Controls (I&C), placing the sources under direct RP control and then revising the applicable RWP. RP management had a briefing with RP personnel on this event and has reemphasized the importance of following procedures.

CORRECTIVE STEPS TO BE TAKEN TO AVOID FURTHER VIOLATIONS

Section 3.6 of RSP-0200 will be revised to clarify the requirements for using other documents to provide RP requirements. Discussion of this event will be included in the upcoming RP requalification training cycle to emphasize the importance of following RP procedures.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

EOI was in full compliance on February 1, 1996.

ATTACHMENT A

REPLY TO NOTICE OF VIOLATION IR 458/9606-01

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VIOLATION - EXAMPLE 3

Section 6.2.5 of Procedure RPP-0043, Revision 7, "Personnel Contamination Monitoring", states that a radiation protection technician shall: "perform a survey of the individual, determine the extent and magnitude of the contamination."

On January 31, 1996, the inspector identified that a contract radiation protection technician did not perform a survey of the individual to determine the extent and magnitude of the contamination prior to the start of decontamination.

REASON FOR EXAMPLE 3

The reason for this violation was personnel error on the part of the contract RP technician who failed to follow procedure.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

No immediate actions were taken as a result of this issue. RP management had a briefing with RP personnel on this event and has reemphasized the importance of following procedures. Discussion of this event will be included in the upcoming RP requalification training cycle to emphasize the importance of following RP procedures.

CORRECTIVE STEPS TO BE TAKEN TO AVOID FURTHER VIOLATIONS

Procedure RPP-0043 will be revised to redefine what a personnel contamination is, to allow radiation workers to perform frisks of the affected zones and to provide additional direction addressing the handling of low level contaminations detected by the personnel contamination monitors. Radiation worker training will be revised to reflect these changes and this violation will be incorporated into RP training for the next refueling outage.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

EOI is in full compliance.

ATTACHMENT A

REPLY TO NOTICE OF VIOLATION IR 458/9606-01

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VIOLATION - EXAMPLE 4

Section 4.1 of Procedure RPP-0018, Revision 4, "Personnel Decontamination", states that personnel decontamination is conducted under the direction of qualified radiological programs personnel.

On January 31, 1996, the inspector identified that a number of workers attempted to decontaminate themselves without being under the direction of qualified radiological programs personnel.

REASON FOR EXAMPLE 4

Based on our investigation, the reason for this violation was personnel error - failure to follow the training which had previously been provided.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

A qualified radiation protection technician was assigned to the 95' Turbine Building access control point upon notification by the NRC inspector of his observations.

CORRECTIVE STEPS TO BE TAKEN TO AVOID FURTHER VIOLATIONS

A memorandum will be issued to RBS supervision to discuss the importance of procedural compliance and radworker training compliance with site personnel. The memorandum will include the radiation worker procedural compliance issues contained in the examples for violation 458/9606-01.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

EOI is in full compliance.