



**GULF STATES UTILITIES COMPANY**

RIVER BEND STATION POST OFFICE BOX 220 ST FRANCISVILLE, LOUISIANA 70775  
AREA CODE 504 636-6094 346-8661

July 9, 1992  
RBG- 37144  
File Nos. G9.5, G15.4.1

U.S. Nuclear Regulatory Commission  
Region IV - Regional Administrator  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 76011

Gentlemen:

River Bend Station - Unit 1  
Docket No. 50-458/92-13

Pursuant to 10CFR2.201, this letter provides Gulf States Utilities Company's (GSU) response to the Notice of Violation for NRC Inspection Report Item No. 50-458/9213-01. The inspection was conducted by Messrs. R.E. Baer and A.D. Gains on April 27, through May 1, 1992 of activities authorized by NRC Operating License NPF-47 for River Bend Station - Unit 1 (RBS). GSU's reply to the violation is provided in the attachment.

Should you have any questions, please contact Mr. L.A. England at (504) 381-4145.

Sincerely,

J.C. Deddens  
Sr. Vice President  
River Bend Nuclear Group

WHO/LAE/PDG/EMC/JHM/kvm

Attachment

cc: U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, D.C. 20555

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

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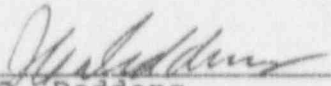
UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

STATE OF LOUISIANA )  
PARISH OF WEST FELICIANA )  
In the Matter of )  
GULF STATES UTILITIES COMPANY )  
(River Bend Station - Unit 1)


Docket No. 50-458

AFFIDAVIT

J. C. Deddens, being duly sworn, states that he is a Senior Vice President of Gulf States Utilities Company; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission the documents attached hereto; and that all such documents are true and correct to the best of his knowledge, information and belief.

  
\_\_\_\_\_  
J. C. Deddens

Subscribed and sworn to before me, a Notary Public in and for the State and Parish above named, this 9th day of July, 1992. My Commission expires with Life.

  
\_\_\_\_\_  
Claudia F. Hurst  
Notary Public in and for  
West Feliciana Parish, Louisiana

## ATTACHMENT

### REPLY TO NOTICE OF VIOLATION 50-458/9213-01 LEVEL IV

#### REFERENCE

Notice of Violation - Letter from A.B. Beach to J.C. Deddens dated June 9, 1992 and Licensee Event Report 92-002 - Letter from W.H. Odell to NRC dated June 1, 1992

#### VIOLATION

Technical Specification 6.12.1 states, in part, that personnel allowed access to radiation areas greater than 1000 millirem per hour (i.e., very high radiation areas) shall have a continuously indicating radiation dose rate device or a continuously integrating radiation dose device or be under positive control by an individual qualified in radiation protection procedures with a radiation dose rate monitoring device.

Contrary to the above, on April 30, 1992, the licensee observed by television monitor an individual inside a posted very high radiation area without a continuously indicating radiation dose rate device or a continuously integrating radiation dose device or positive control by an individual qualified in radiation protection procedures with a radiation dose rate monitoring device.

#### REASON FOR THE VIOLATION

On April 30, 1992 at approximately 0315 a Westinghouse chemical decontamination employee was found within the boundary of a posted very high radiation area without appropriate monitoring devices or administrative controls. This is a violation of River Bend Station Technical Specification 6.12.1. The root cause of this violation of the requirements for entry into a very high radiation area was personnel error on the part of both the Westinghouse employee who entered the area and the Radiation Protection lead technician who allowed the entry to occur. More extensive details of this event are provided in Licensee Event Report 92-002 which was submitted to the NRC June 1, 1992.

Prior to this incident the Westinghouse employee had completed General Employee Training II which emphasizes very high radiation area entry requirements and had signed a statement that he had read, understood, and agreed to comply with the requirements of Radiation Work Permit 92-4024. This radiation work permit was appropriate for the work he was to perform at the time of this incident, and it stated that an alarming dosimeter and/or dose rate instrument and a stay time were required for entry into very high radiation areas. On the morning of April 30, 1992, after telling the Radiation Protection lead technician that his work did not require entry into a very high radiation area, the Westinghouse employee entered a properly posted very high radiation area. This

entry required passing a rope boundary, multiple flashing red lights, a self closing scaffold gate, very high radiation area posting signs and a fluorescent "stop" sign that stated "STOP TECH SPEC MONITORING REQUIRED BEYOND THIS POINT."

Just prior to this incident the Radiation Protection lead technician questioned the Westinghouse employee to determine the location and extent of the work to be performed. The Westinghouse employee stated that he did not require access to a very high radiation area but he requested that the tie wrap securing the very high radiation area entrance be cut. Tie wraps are installed on very high radiation area rope entrances in accordance with Radiation Protection Department standing instructions and function as locking devices. The Radiation Protection lead technician directed another Radiation Protection technician to cut the tie wrap at the Westinghouse employee's request. The Radiation Protection lead technician did not realize that he was effectively unlocking a very high radiation area and was allowing access in violation of River Bend Station Technical Specifications.

The contract employee was conscience of the requirements not to go into a posted very high rad area without the required monitoring device or other administrative controls. He also knew where the actual high dosage areas were within the posted boundary and intentionally avoided those areas. His self-reading pocket dosimeter readings indicated he received zero mRem exposure. Regardless, TS monitoring and stay time requirements are to be observed at the point of entry irrespective of varying dose rates within the posted area.

#### CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

Radiation Protection management reviewed RPP-0005, "Posting of Radiologically Controlled Areas", General Employee Training II, Radiation Protection Standing Instruction 92-0009 and the corrective actions implemented as a result of LER 92-0006. It was determined that the procedures and practices currently in place at River Bend Station for control of access to very high radiation areas are adequate. This incident does not appear to be a failure of the Radiation Protection program but a failure of individuals to properly perform their assigned duties. Corrective action will be taken at a personal level. The Westinghouse employee will receive appropriate disciplinary action and will be required to retake and pass the River Bend Station High Radiation Area/Very High Radiation Area examination before being allowed to reenter the radiologically controlled area. The Radiation Protection lead technician received appropriate counseling.

#### CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER FINDINGS

Current procedures, General Employee Training, and policies concerning entry into high radiation areas and very high radiation areas are adequate and effective. This incident resulted when two individuals, despite training and physical barriers, failed to use good judgement. Situations such as this will be corrected by taking the measures necessary to correct the individual's attitude and job

performance deficiencies.

**DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED**

The Westinghouse employee has completed his retraining and disciplinary action. The Radiation Protection lead technician received counseling on May 20, 1992. GSU is currently in full compliance with TS 6.12.1 and Radiation Protection requirements.