



ENTERGY

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Waterford 3

W3F1-92-0412
A4.05
QA

September 16, 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 92-21
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: J.L. Milhoan, NRC Region IV
D.L. Wigginton, NRC-NRR
R.B. McGehee
N.S. Keynolds
NRC Resident Inspectors Office

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ATTACHMENT 1

ENERGY OPERATIONS, INC. RESPONSE TO THE VIOLATION IDENTIFIED IN
APPENDIX A OF INSPECTION REPORT 92-21

VIOLATION NO. 9221-01

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.(4) of Appendix A of Regulatory Guide 1.33, Revision 2, February 1978 lists radiation protection procedures for contamination control.

Section 5.2.2.2 of Administrative Procedure HP-001-219, "Radiological Posting Requirements," requires that contamination area postings be clearly demarcated with the appropriate boundary ropes/ribbon, signs, and stanchions as necessary to control the activity.

Contrary to the above, on July 28, 1992, the inspector determined that the boundary ropes for a contaminated area posting in Safeguards Room A had fallen down and, therefore, did not clearly demarcate the contaminated area.

RESPONSE

(1) Reason for the Violation

Energy Operations, Inc. admits this violation and believes that the root cause was inappropriate action in that two pieces of rope demarcating a contaminated area posting in Safeguards Room A were not appropriately connected. The two pieces of rope were taped end to end in a butt connection. It is believed that tensional forces caused the ropes to separate and fall to the floor. The exact time of failure could not be determined; however, the area had been inspected and found satisfactory by a Health Physics Technician on July 27, 1992. Because the boundary ropes were on the floor, they did not demarcate clearly the contaminated area.

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

Immediately upon discovery of this event, the contaminated area boundary ropes were secured and verified to demarcate clearly the correct area. Additionally, Health Physics personnel performed an inspection of other contaminated areas to identify similar conditions that could potentially lead to downed boundaries. During this inspection, similar conditions were identified and corrected. No instances of downed contaminated area boundaries were identified.

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

This event will be discussed with the staff Health Physics technicians to accentuate lessons learned and the importance of securing contaminated area boundaries. Moreover, Health Physics will promulgate additional guidance regarding the use of tape when establishing contaminated area boundaries.

(4) Date When Full Compliance Will Be Achieved

Full compliance will be achieved by December 4, 1992.