UNITED STATES



NUCLEAR REGULATORY COMMISSION

REGION IV

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

APR 1 7 1998

Entergy Operations, Inc. ATTN: John R. McGaha, Vice President -Operations, River Bend Station P.O. Box 220 St. Francisville, Louisiana 70775

SUBJECT: NRC INSPECTION REPORT 50-458/96-06

Thank you for your letter of April 5. 1996. in response to our letter and Notice of Violation dated March 7, 1996. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely. Momas P. Gwynn, Direct Division of Reactor

Docket: 50-458 License: NPF-47

Enclosure: Letter dated April 5, 1996

cc w/o enclosure: Entergy Operations, Inc. ATTN: Executive Vice President and Chief Operating Officer P.O. Box 31995 Jackson, Mississippi 39286-1995

Entergy Operations. Inc. ATTN: Vice President Operations Support P.O. Box 31995 Jackson, Mississippi 39286-1995

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Entergy Operations, Inc. ATTN: General Manager Plant Operations River Bend Station P.O. Box 220 St. Francisville, Louisiana 70775 Entergy Operations. Inc. ATTN: Director - Nuclear Safety River Bend Station P.O. Box 220 St. Francisville, Louisiana 70775 Wise, Carter, Child & Caraway P.O. Box 651 Jackson, Mississippi 39205 Winston & Strawn ATTN: Mark J. Wetterhahn, Esg. 1401 L Street, N.W. Washington, D.C. 20005-3502 Entergy Operations. Inc. ATTN: Manager - Licensing River Bend Station P.O. Box 220 St. Francisville, Louisiana 70775 The Honorable Richard P. Ieyoub Attorney General P.O. Box 94095 Baton Rouge, Louisiana 70804-9095 H. Anne Plettinger 3456 Villa Rose Drive Baton Rouge, Louisiana 70806 President of West Feliciana Police Jury P.O. Box 1921 St. Francisville, Louisiana 70775 Cajun Electric Power Coop. Inc. ATTN: Larry G. Johnson, Director Systems Engineering 10719 Airline Highway P.O. Box 15540 Baton Rouge, Louisiana 70895

Entergy Operations, Inc. -3-

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William H. Spell. Administrator Louisiana Radiation Protection Division P.O. Box 82135 Baton Rouge, Louisiana 70884-2135

Entergy Operations. Inc.

E-Mail report to D. Nelson (DJN) E-Mail report to NRR Event Tracking System (IPAS)

bcc w/enclosure to DMB (IE01)

bcc w/enclosure distrib. by RIV:

L. J. Callan Senior Resident Inspector (Grand Gulf) DRP Director Senior Resident Inspector (Cooper) Branch Chief (DRP/D) DRS-PSB Project Engineer (DRP/D) MIS System Branch Chief (DRP/TSS) RIV File Resident Inspector UC/LFDCB, MS: TWFN 9E10)

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DRS AI 96-G-0022

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Entergy Operations. Inc.

E-Mail report to D. Nelson (DJN) E-Mail report to NRR Event Tracking System (IPAS)

-4-

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L. J. Callan DRP Director Branch Chief (DRP/D) Project Engineer (DRP/D) Branch Chief (DRP/TSS) Resident Inspector Senior Resident Inspector (Grand Gulf) Senior Resident Inspector (Cooper) DRS-PSB MIS System RIV File Leah Tremper (OC/LFDCB, MS: TWFN 9E10)

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Entergy Operations, inc. River Bend Station 5485 U.S. Highway 61 PO Box 220 St. Francisville, LA 70775 Tel 504 336 6225 Fax 504 635 5068

James J. Fisicaro Director Nuclear Safety

April 5, 1996

U.S. Nuclear Regulatory Commission Document Control Desk Mail Stop P1-37 Washington, D.C. 20555 10 1000

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.

96-1119

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Reply to NRC Notice of Violation IR 96-06 April 5, 1996 RBG-42677 RBF1-96-0085 Page 2 of 2

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

Sincerely,

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A Leavines

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 M/S OWFN 13-H-15 Washington, DC 20555

REPLY TO NOTICE OF VIOLATION IR 458/9606-01

page 1 of 4

VIOLATION (EXAMPLE 1)

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.

REPLY TO NOTICE OF VIOLATION IR 458/9606-01

page 2 of 4

VIOLATION (EXAMPLE 2)

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 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.

REPLY TO NOTICE OF VIOLATION IR 458/9606-01

page 3 of 4

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.

REPLY TO NOTICE OF VIOLATION IR 458/9606-01

page 4 of 4

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.