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June 25, 1997

U.S. Nuclear Regulatory Commission
Mail Station P-137
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Grand Gulf Nuclear Station Unit 1
Docket No. 50-416
License No. NPF-29
Reply To A Notice Of Violation
Failure to Have a Qualified Individual for the Offsite
Emergency Coordinator Position Available
Report No. 50-416/97-06 (GNRI-97/00073), dated 05/27/97

GNRO-97/00057

Gentlemen:

Entergy Operations, Inc. hereby submits the response to Notice of Violation 50-416/9706-03.

Yours truly,

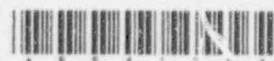
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Response to Notice of Violation 50-416/97-06-03
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IEO1/1



Notice of Violation 97-06-03

10 CFR 50.54(q) states that a licensee authorized to possess and operate a nuclear power reactor shall follow and maintain in effect emergency plans which meet the standards in 50.47(b) and the requirements in Appendix E of this part.

Appendix A to Grand Gulf Nuclear Station Emergency Plan, List of Procedures that Implement the Emergency Plan, includes Procedure 01-S-10-6, "Emergency Response Organization."

Procedure 01-S-10-6, "Emergency Response Organization," Revision 7, requires that personnel assigned to the emergency response organization must, during the scheduled on-call period, ensure that they are available to respond within the required time. Procedure 01-S-10-6 also requires that personnel assigned to the emergency response organization must, if circumstances prohibit response within the required times, ensure that an alternate (from the same emergency response position) has agreed to and is available for emergency response coverage, and notify Emergency Preparedness of the arrangements made.

Contrary to the above, on April 24, 1997, the licensee failed to ensure that a qualified individual was available to respond for the emergency response organization position of Offsite Emergency Coordinator.

This is a Severity Level IV violation (Supplement VIII) (50-416/9706-03).

I. Admission or Denial of the Alleged Violation

Entergy Operations, Inc. admits to this violation.

II. The Reason for the Violation, if Admitted

On April 23, 1997, the on-call Offsite Emergency Coordinator (OEC) discussed the Operational Performance presentation, which was to occur the next day in Arlington, Texas, with his departmental technical assistant. During this discussion, the on-call OEC recognized that he needed a stand-in for his Emergency Response Organization (ERO) position the next day since he would be away from the area. This discussion occurred after normal working hours when the personnel he needed to check with were unavailable.

During this discussion there were only three people identified on the call out list as being a qualified OEC: the on-call OEC and two other individuals who were also going to be out of the immediate area on the 24th. Other Alternates were then considered and two possible candidates were determined worth following up on. It was concluded that this was all that could be done and an action item was left with the Tech. Assistant to check with EP and the possible Alternate OEC on April 24, 1997, to make sure they knew he was filling the OEC position

On the morning of April 24, 1997, EP was called and it was determined that the individual who was going to be informed he was filling the position was not certified as qualified by the EOF Facility Process Owner. At approximately 0930 that day, a condition report was generated to identify that no qualified OEC was available. In addition, because the selected alternate had met all the qualifications and training except the signature from the EOF Facility Process Owner, EP generated a memo (GIN 97/00884) to document that the Alternate OEC was qualified by experience and appointment. However they failed to realize that approval was needed from the EOF Facility Process Owner prior to deviating from requirements.

The root cause of the condition was personnel error in that upon finding out the status of the proposed alternates an inappropriate decision was made. There was not time to reach the OEC before his flight nor time for obtaining written approval from the EOF Facility Process Owner qualifying or waiving normal training requirements for the Alternate OEC. Consequently a condition report was written for provisionally accepting him as an alternate for the OEC position.

Contributing Causes of the deficiency are:

- The Alternate OEC was complete on his qualification, except that the Facility Process Owner had not signed off on his qual card approving him for on-call status.
- EP failed to contact the EOF Facility Process Owner via telephone/pager to obtain verbal approval of the Alternate OEC for OEC position.
- PAP 01-S-10-6 does not allow signature authority for Facility Process Owners to be delegated to other Management personnel (e.g. Manager, Emergency Preparedness, Director, Plant Projects & Support, etc.).

III. Corrective Steps Which Have Been Taken and Results Achieved

Immediate corrective actions were:

- The On-call OEC and Technical Assistant involved were counseled on the inappropriate decision via reading of the CR.
- Final sign-offs on the Alternate OEC qualification paperwork were obtained.
- Documented interim acceptability of the Alternate OEC's qualification via a memo (GIN 97/00884).
- EP Staff was counseled about the failure to attempt all possible methods to contact Facility Process Owners.

IV. Corrective Steps to be Taken to Preclude Further Violations

Revise Emergency Response Organization Admin Procedure (PAP 01-S-10-6) to allow Facility Process Owners signature authority to be delegated to other Management personnel (e.g. Manager, Emergency Preparedness, Director, Plant Projects & Support, etc.).

V. Date When Full Compliance Will be Achieved

The above actions shall be completed by August 15, 1997.