

ENCLOSURE 1

NOTICE OF VIOLATION

Entergy Operations, Inc.  
Grand Gulf Nuclear Station

Docket No.: 50-416  
License No.: NPF-29

During an NRC inspection conducted on September 20 through October 31, 1998, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

- A. 10 CFR Part 50, Appendix B, Criterion XVI, requires that measures be established to assure that conditions adverse to quality, such as deficiencies and nonconformances, are promptly identified and corrected.

Contrary to the above, from May 21 through October 15, 1998, conditions adverse to quality identified in Condition Report 1998-0014 were not promptly corrected. The installation of temporary cables to provide additional required restraint to boat landing grating Sections 77, 78, 88, 89, 90, 91, 92, 93, and 94 on the 114-foot-6-inch elevation of containment, which were required by Condition Report 1998-0014 until a permanent change could be made, were not replaced following the refueling outage that ended May 21, 1998. On October 15, 1998, grating Sections 77, 78, 91, 92, 93, and 94 were found unsecured (no fasteners or temporary cables installed), and the remaining gratings were not restrained with temporary cables, as required.

This is a Severity Level IV violation (Supplement I) (50-416/9813-01)

- B. 10 CFR Part 50, Appendix B, Criterion V, requires that activities affecting quality be prescribed by documented instructions or procedures of a type appropriate to the circumstances and that the activities be accomplished in accordance with the procedures.

Contrary to the above, as of May 7, 1998, the following examples were identified:

1. Procedure 01-S-17-5, "Engineering Request," Revision 6, Section 6.5.3, states that an engineering reply response provides information obtained from existing reference documents or standard engineering practices, or elaborates on or interprets existing information. This type of response cannot be used to change plant documents or design or to control actions in the field. Section 6.9.1 states that the responsible engineer is to address all issues relevant to the request and to document a complete response to the engineering request and that a 10 CFR 50.59 safety review is not required for an engineering reply.

The engineering reply written in response to Engineering Request 98/0209, which requested that the rigging fixtures for the theta drive and R-Z drive be evaluated, did not provide information from reference documents or standard engineering practices or elaborate on or interpret existing information. The reply evaluated vendor provided calculations and provided guidance which failed to take into account Updated Final Safety Analysis Report and site procedure requirements regarding heavy lifts over the core. In addition, the engineering

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reply was used to provide direction for control of actions to be taken on the refueling floor.

2. Procedure 07-S-05-300, "Control and Use of Cranes and Hoists," Revision 104, Section 6.3.7, requires that loads in excess of 1140 lbs. have special lift procedures.

Procedure 07-S-05-310, "Operation of Containment Polar Crane," Revision 100, is referenced by Procedure 07-S-05-300 and provides information necessary to safely handle loads with the polar crane. Section 6.1.3 of Procedure 07-S-05-310 requires that all Safety Class 1 loads have special lift procedures.

The special lift procedure used during the lift on May 7, 1998, was not appropriate to the circumstances in that the procedure failed to limit the time and the height the load was carried over the area of concern, contained no inspection requirements or acceptance criteria to be met prior to movement of the load, and did not address special precautions. The procedure used, Procedure STD-FP-1996-7674, "BWR Shroud Inspection Tooling Installation and Removal," Revision 2 was a generic procedure developed by the vendor and was not reviewed or approved by the licensee to verify that it met the licensee's program requirements for heavy lifts.

3. Procedure 01-S-06-24, "Safety and Environmental Evaluations," Revision 103, Section 6.3.1, requires that new procedures with the potential for adversely affecting the environment and operation of structures or components in the Updated Final Safety Analysis Report be reviewed for safety evaluation applicability.

Procedure 07-S-05-310, "Operation of Containment Polar Crane," Revision 100, Attachment 1 requires that loads greater than 1140 lbs. shall not be carried over fuel assemblies stored in the reactor cavity without a safety evaluation.

No safety evaluation or safety evaluation applicability screen was performed prior to installing or removing the Theta Drive (total lift weight, 1490 lbs.) or the R-Z Mast (total lift weight, 1250 lbs.) in the reactor vessel while fuel was in the reactor during Refueling Outage 9.

4. Procedure 01-S-06-2, "Conduct of Operations," Revision 104, Section 6.7.6, requires that the refuel floor supervisor notify the shift superintendent before the start of any major evolution.

The refuel floor supervisor assigned to supervise the removal of the heavy equipment from the reactor vessel did not notify the shift superintendent prior to commencing the heavy lift over the reactor vessel, a major evolution.

This is a Severity Level IV violation (Supplement I) (50-416/9813-02).

Pursuant to the provisions of 10 CFR 2.201, Entergy Operations, Inc. is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation or severity level, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Arlington, Texas  
this 1st day of December 1998