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February 23, 1998

U.S. Nuclear Regulatory Commission
Document Control Desk, OP1-17
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Subject: Reply to Notice of Violation in IR 97-020
River Bend Station - Unit I
License No. NPF-47
Docket No. 50-458

File Nos.: G9.5, G15.4.1

RBG-44386
RBF1-98-0048

Gentlemen:

Pursuant to the provisions of 10CFR2.201, Attachment A provides the Entergy Operations, Inc. response to the Notice of Violation (NOV) described in NRC Inspection Report (IR) 50-458/97-020.

The subject violation, 50-458/97020-01, involves a procedural non-compliance in that a Senior Radiation Protection (RP) Technician utilized professional judgment in lieu of strictly following the minimum anti-contamination clothing requirements set forth in a general Radiation Work Permit (RWP) 97-0002.

Should you have any questions regarding the attached information, please contact Mr. David Lorring of my staff at (504) 381-4157.

Sincerely,

DAV LORRING

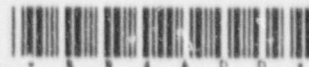
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Reply to Notice of Violation in 50-458/97-020
February 23, 1998
RBG-44386
RBF1-98-0048
Page 2 of 2

cc: U.S. Nuclear Regulatory Commission
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David Wigginton
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ATTACHMENT A
REPLY TO NOTICE OF VIOLATION 50-458/97020-01

Page 1 of 2

Violation:

During an NRC inspection conducted on October 8-15, 1997, 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:

Technical Specification 5.4.1.a states, in part, that written procedures shall be implemented covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, 1978.

Appendix A of Regulatory Guide 1.33, Section 7.e.1, recommends procedures for the radiation work permit system.

River Bend Nuclear Procedure RBNP-024, Revision 7, "Radiation Protection Plan," states, in part, "Adherence to the requirements of the RWP is mandatory."

Radiation Work Permit (RWP) 97-002, Revision 1, which authorized work activities in the 95-foot elevation of the fuel storage building on October 10, 1997, listed minimum anti-contamination clothing requirements as "booties and gloves."

Contrary to the above, on October 10, 1997, a radiation protection technician working in the 95-foot elevation of the fuel storage building reached into a posted contaminated area without adhering to the anti-contamination clothing requirements of Radiation Work Permit 97-002, Revision 1. Specifically, the radiation protection technician was wearing only cotton glove liners rather than the required booties and gloves.

This is a Severity Level IV violation (Supplement IV) (50-458/97020-01)

Clarification:

Radiologically Controlled Area (RCA) access records indicate that the RP technician was not working under 97-0002. The RP technician was actually working under RWP 97-900. At the time of this event, with the specified minimum anti-contamination clothing requirement set as "singles" (i.e., a full set of protective clothing, including booties and gloves). This information is provided for clarification of the RWP in use at the time of the violation.

ATTACHMENT A
REPLY TO NOTICE OF VIOLATION 50-458/97020-01

Page 2 of 2

Reasons for the Violation:

A root cause analysis was performed which determined that the primary reason for the violation was poor judgment by the contract RP technician. The RP technician indicated that he was aware of the requirements of his RWP 97-9002, while also acknowledging that compliance with RWP requirements was mandatory. Despite this, the RP Technician chose to exercise professional judgment based on his knowledge of the conditions present. The RWP did not permit the RP technician this latitude.

Corrective Actions That Have Been Taken:

The following actions have been taken:

- The RP technician and the crew with which he was working frisked using PCM-1Bs and no contamination was found.
- The technician was interviewed and counseled on the importance of complying with the requirements of the RWP.
- Active RWPs were reviewed to ensure that protective clothing requirements were clearly stated.
- Active RWPs were changed, as necessary, to simplify the method for stipulating protective clothing requirements.
- The causes and corrective actions related to this event were discussed with RP personnel.

Corrective Actions That Will Be Taken to Avoid Further Violations:

The above actions are adequate to preclude recurrence.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved when the RP technician exited the posted contamination area on October 10, 1997.