



Entergy

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Rick J. King
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April 30, 1998

U.S. Nuclear Regulatory Commission
Document Control Desk, OP1-17
Washington, DC 20555

Subject: Reply to Notice of Violation in IR 98-003
River Bend Station - Unit I
License No. NPF-47
Docket No. 50-458

File Nos.: G9.5, G15.4.1

RBG-44453
RBF1-98-0089

Gentlemen:

Pursuant to the provisions of 10CFR2.201, Attachments A, B, and C provide the Entergy Operations, Inc. responses to the Notice of Violation (NOV) described in NRC Inspection Report (IR) 50-458/98-003. These responses are being submitted within the one week extension as granted by Mr. Tom Dexter on April 23, 1998.

The subject violations, 50-458/98003-01 and 02, involve failure to formally document the comprehensive radiation protection program review, and failure of individuals to properly follow radiation protection procedures.

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

Sincerely,

RJK/MGM
attachment

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April 30, 1998
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cc: U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
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NRC Sr. Resident Inspector
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ATTACHMENT A

REPLY TO NOTICE OF VIOLATION 50-458/98003-01

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Violation:

During an NRC inspection conducted on February 23-26, 1998, a 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:

10 CFR 20.2102(a)(2) states that each licensee shall maintain records of the radiation protection program, including audits and other reviews of program content and implementation. 10CFR20.1101(c) states that the licensee shall periodically (at least annually) review the radiation protection program content and implementation.

Contrary to the above, prior to February 26, 1998, the licensee had not maintained records of reviews of the radiation protection program content and implementation.

This is a Severity Level IV violation (Supplement IV) (50-458/9803-01).

Reasons for the Violation:

Individual audits and assessments had been satisfactorily conducted, which, as a whole, were considered to meet the intent requirement of 10CFR20.1101(c). The primary reason for this finding was determined to be that administrative controls were less than adequate, in that there was no formal process in place to ensure formal documentation of the comprehensive review of these audits and assessments.

Corrective Actions That Have Been Taken:

An item was added to the Licensing Commitment Tracking system which will ensure the preparation of the annual summary report on or before April 30th of each year. This date was chosen to agree with the due date for the other annual reports required by 10CFR20 and associated regulatory guides.

Corrective Actions That Will Be Taken to Avoid Further Violations:

The applicable procedure will be revised to include a requirement for Radiological Programs management to prepare an annual summary report of the audits, assessments, and reviews of the content and implementation of the radiation protection program. As part of this revision, a statement will be added to include in this report an evaluation of the planned reviews for the upcoming year to ensure the appropriate audits, assessments, and reviews are scheduled.

A summary report will be prepared to satisfy the documentation requirements of 10CFR20.2102(a)(2) for the years 1996 and 1997.

Date When Full Compliance Will Be Achieved:

Full compliance will be achieved through completion of the corrective actions by June 30, 1998.

ATTACHMENT B

REPLY TO NOTICE OF VIOLATION 50-458/98003-02

(Example 1)

Page 1 of 2

Violation:

During an NRC inspection conducted on February 23-26, 1998, a 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 requires, in part, that written procedures be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Section 7.e of Appendix A of this Regulatory Guide includes procedures for contamination control and personnel monitoring.

Section 5.1 of Procedure RPP-0043, Revision 10, "Personnel Contamination Monitoring," states that personnel alarming portal monitors after resetting one time must be evaluated by qualified personnel.

Contrary to the above, on October 18, 1997, three individuals exiting the controlled access area at the Turbine Building 95-foot "T" Tunnel Control Point were observed to alarm the portal monitors and immediately began to decontaminate themselves without being evaluated by qualified personnel.

This is a Severity Level IV violation (Supplement IV) (50-458/9803-02).

Reasons for the Violation:

The primary reason for this finding was determined to be change management, in that changes were not effectively communicated. From the beginning of Refueling Outage 7, until the date of this event, plant workers had performed decontamination activities following Personnel Contamination Monitor (PCM) alarms under the direction of Radiation Protection (RP) Technicians at control points. The workers involved in this event had become accustomed to performing decontamination actions, but apparently did not remember that qualified personnel had to be present to supervise their actions and assist as needed.

The change from a manned Radiologically Controlled Area (RCA) control point to an unmanned control point was not communicated to workers in the plant in an effective manner. It resulted in the three workers mistakenly thinking they could decontaminate themselves, even though instructions had been posted at the contamination monitors directing personnel to contact RP when a contamination monitor alarms.

ATTACHMENT B

REPLY TO NOTICE OF VIOLATION 50-458/98003-02

(Example 1)

Page 2 of 2

Corrective Actions That Have Been Taken:

The RP technician who noted the personnel error on a closed circuit television monitor went directly to the control point and promptly corrected the situation, including counseling the individuals.

Prominent signs were installed at the RCA Control Points. These signs reinforced to station personnel that self-decontamination activities are prohibited by station procedures.

Corrective Actions That Will Be Taken to Avoid Further Violations:

The Access Control procedure will be revised to temporarily close the applicable control point during changes from a manned to unmanned status, until the change can be effectively communicated to plant personnel.

The Personnel Contamination Monitoring procedure will be revised to more clearly define how qualified personnel evaluate PCM alarms.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on October 18, 1997, upon the qualified RP Technician correcting the error and counseling the responsible personnel.

ATTACHMENT C

REPLY TO NOTICE OF VIOLATION 50-458/98003-02

(Example 2)

Page 1 of 2

Violation:

During an NRC inspection conducted on February 23-26, 1998, a 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 requires, in part, that written procedures be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Section 7.e of Appendix A of this Regulatory Guide includes procedures for contamination control and personnel monitoring.

Section 6.7.3.3 of Procedure RPP-0005, Revision 12, "Posting of Radiologically Controlled Areas," states that contamination area posting signs shall be conspicuous, bear the radiation symbol, and the words:

- (1) "CAUTION" or "DANGER"
- (2) "CONTAMINATION AREA" or "CONTAMINATED AREA"

Contrary to the above, on September 24, 1997, a technician noted that one side of an area exceeding procedural requirements to post as a contaminated area was posted as a contaminated area while the other sides of the contaminated area were not conspicuously posted with the words "CONTAMINATION AREA" or "CONTAMINATED AREA."

This is a Severity Level IV violation (Supplement IV) (50-458/9803-02).

Reasons for the Violation:

The primary reason for this finding was determined to be a personnel error, in that the individual failed to adequately self-check in accordance with organizational standards. The RP Technician who established and posted the contamination area on 141 foot elevation of the reactor building failed to ensure that each of the posting signs contained the insert "Contamination Area."

ATTACHMENT C

REPLY TO NOTICE OF VIOLATION 50-458/98003-02

(Example 2)

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Corrective Actions That Have Been Taken:

Upon discovery, the posting discrepancy was promptly corrected.

These events have been discussed with the RP Technicians emphasizing the importance of radiological postings and attention-to-detail in their activities.

The RP Technicians were counseled on the importance of self-checking and attention to detail when establishing or changing radiological postings.

An observation tracking mechanism has been established to identify this and other possible negative trends early in the sequence to reduce the number of events before corrective actions are implemented. Feedback to RP Technicians will be provided on the applicable observations.

Corrective Actions That Will Be Taken to Avoid Further Violations:

The completed corrective actions are considered adequate to prevent further violations.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on September 24, 1997, upon properly posting the area.