



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

July 28, 2023

EA-23-019

Brad Kapellas, Site Vice President
Entergy Operations, Inc.
P.O. Box 756
Port Gibson, MS 39150

**SUBJECT: GRAND GULF NUCLEAR STATION – FINAL SIGNIFICANCE
DETERMINATION OF A GREEN FINDING AND NOTICE OF VIOLATION;
NRC INSPECTION REPORT 05000416/2023091**

Dear Brad Kapellas:

This letter provides you the final significance determination of the preliminary White finding discussed in our previous communication dated May 18, 2023, which included Inspection Report 05000416/2023090, Agencywide Documents Access and Management System (ADAMS) Accession No. ML23122A163. The finding involved calibration failures for the drywell and containment high range area radiation monitors, resulting inability of the monitors to perform their intended function for emergency preparedness actions, and the apparent failure to declare these radiation monitors inoperable in accordance with technical specification requirements.

At your request, a regulatory conference was held on July 6, 2023, to discuss your views on this issue. A summary of this meeting, which includes both the NRC's and your presentation, was issued on July 17, 2023 (ML23193A841). During the conference, your staff described your assessment of the significance of the finding and the corrective actions taken to resolve it. The details associated with the points and perspectives you presented, as well as the NRC's perspectives on these items are included in the summary of the meeting and in its enclosures.

After considering the information developed during the inspection and the information presented at the regulatory conference, including additional calibration data not available during the initial inspection, the NRC concluded that while your calibration procedures were deficient, the drywell and containment high range area radiation monitors remained operable. The NRC further concluded that the finding associated with deficiencies in your calibration procedures is appropriately characterized as Green, a finding of very low safety significance, and associated with the Occupational Radiation Safety cornerstone. The NRC has also determined that a violation is associated with this finding.

The violation was evaluated in accordance with the NRC Enforcement Policy. The current Enforcement Policy is included on the NRC's website at (<http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>). The violation is cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding it are described in detail in Inspection Report 05000416/2023090. The violation did not meet the criteria to be treated as a non-cited violation because your staff failed to restore compliance within a reasonable period after the violation was identified.

The May 18, 2023, inspection report documented two apparent violations that were associated with: 10 CFR 50.54(q)(2) for the failure to follow and maintain the effectiveness of an emergency plan and standards of 10 CFR 50.47(b)(4); and Technical Specification 3.3.3.1 for the failure follow the limiting condition for operations and submit a special report for an inoperable radiation monitor. Because at the regulatory conference your staff presented new information, relative to the Safety Parameter Display System (SPDS) computer point data, that the drywell and containment high range area radiation monitors remained operable, the NRC reviewed this information and concluded these two apparent violations were not violations of NRC requirements.

The May 18, 2023, inspection report also documented a cross-cutting aspect of H.9 – Training associated with the finding. After considering the information developed during the inspection and the information presented at the regulatory conference, the NRC has concluded that the cross-cutting aspect is characterized as H.1 – Resources. This determination was made after considering the procedures, equipment noted in the procedures, and your staff's knowledge to use appropriate readouts to meet the +/- 20 percent tolerances were not adequate to ensure the calibrations were performed appropriately.

If you contest the violation or the significance of the violation documented in the Notice, you should follow the instructions specified in the Notice. If you disagree with a cross-cutting aspect assigned to the violation, you should provide a response within 30 days of the date of this letter, with the basis for your disagreement, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with a copy to the Regional Administrator, U.S. Nuclear Regulatory Commission, Region IV, 1600 E. Lamar Blvd., Arlington, TX 76011-4511, and a copy to the NRC resident inspector at Grand Gulf Nuclear Station, and email it to R4Enforcement@nrc.gov.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. If you have additional information that you believe the NRC should consider, you may provide it in your response to the Notice. The NRC review of your response to the Notice will also determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter, its enclosure, and your response will be made available electronically for public inspection in the NRC Public Document Room and from the NRC's ADAMS, accessible from the NRC website at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy or proprietary information so that it can be made available to the public without redaction.

B. Kapellas

3

If you have any questions concerning this matter, please contact me at 817-200-1249.

Sincerely,



Signed by Warnick, Gregory
on 07/28/23

Gregory Warnick, Chief
Decommissioning, ISFSI, and Operating
Reactor Branch
Division of Radiological Safety & Security

Docket No. 05000416
License No. NPF-29

Enclosure: Notice of Violation

cc w/ encl: Distribution via LISTSERV

GRAND GULF NUCLEAR STATION – FINAL SIGNIFICANCE DETERMINATION OF A GREEN FINDING AND NOTICE OF VIOLATION; NRC INSPECTION REPORT 05000416/2023091 - DATED JULY 28, 2023

DISTRIBUTION:

RidsOeMailCenter Resource;	RidsNrrMailCenter Resource;	RidsOgcMailCenter Resource;
RidsSecyMailCenter Resource;	RidsOcaMailCenter Resource;	RidsOigMailCenter Resource;
RidsEdoMailCenter Resource;	EDO_Managers;	RidsNsirMailCenter Resource;
RidsOiMailCenter Resource;	RidsRgn1MailCenter Resource;	RidsRgn2MailCenter Resource;
RidsRgn3MailCenter Resource;	RidsOcoMailCenter Resource;	RidsOpaMail Resource;
RLewis, RA	RidsRgn4MailCenter Resource	R4Enforcement
JMonninger, DRA	JGroom, ORA	DPelton, OE
RLantz, DORS	JKramer, ORA	MHaire, OE
MHay, DORS	DCylkowski, ORA	JPeralta, OE
DProulx, DORS	ARoberts, ORA	PSnyder, OE
WSchaup, DORS	VDricks, ORA	BHughes, NRR
JJosey, OEDO	LWilkins, CA	RFelts, NRR
AMoreno, CA	GMiller, DRSS	JRey, NSIR
MKhanna, NRR	HStrittmatter, DRSS	BAlferick, DRSS
ARiveraVarona, DRSS	LHowell, DRSS	DAntonangeli, DRSS
RAlexander, ORA		

ADAMS ACCESSION NUMBER: **ML23201A252**

SUNSI Review: ADAMS: Non-Publicly Available Non-Sensitive Keyword:
 By: ACR Yes No Publicly Available Sensitive

OFFICE	SES:ACES	HP:DIOR	SHP:DIOR	C:PBC	TL:ACES
NAME	JKramer	DAntonangeli	NGreene	DProulx	JGroom
SIGNATURE	/RA/ E	/RA/ E	/RA/ E	/RA/ E	/RA/ E
DATE	07/21/23	07/25/23	07/24/23	07/24/23	07/21/23
OFFICE	RC	D:DRSS	C:DIOR		
NAME	DCylkowski	GMiller	GWarnick		
SIGNATURE	/RA/ E	/RA/ E	/RA/ E		
DATE	07/25/23	07/27/23	07/28/23		

OFFICIAL RECORD COPY

NOTICE OF VIOLATION

Entergy Operations, Inc.
Grand Gulf Nuclear Station

Docket No. 05000416
License No. NPF-29
EA-23-019

During an NRC inspection conducted from November 14, 2022, to April 5, 2023, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

10 CFR 20.1501(c) requires that the licensee shall ensure that instruments and equipment used for quantitative radiation measurements (e.g., dose rate and effluent monitoring) are calibrated periodically for the radiation measured.

Contrary to the above, from September 2019 to April 5, 2023, the licensee failed to ensure that instruments and equipment used for quantitative radiation measurements (e.g., dose rate and effluent monitoring) were calibrated periodically for the radiation measured. Specifically, the licensee failed to adequately calibrate and maintain the drywell and containment high range area radiation monitors in accordance with industry and vendor standards, as committed to, for a successful calibration.

This violation is associated with a Green Significance Determination Process finding.

Pursuant to 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, DC 20555-0001, with a copy to the Regional Administrator, U.S. Nuclear Regulatory Commission, Region IV, 1600 E. Lamar Blvd., Arlington, TX 76011-4511, and a copy to the NRC resident inspector at Grand Gulf Nuclear Station, and email it to R4Enforcement@nrc.gov, 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; EA-23-019" and should include for the 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, 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, with the basis for your denial, to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Because your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC website at <http://www.nrc.gov/reading-rm/adams.html>, to the extent possible, it should not include any personal privacy or proprietary information so that it can be made available to the public without redaction.

Enclosure

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 that such material is withheld from public disclosure, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information).

Dated this 28th day of July 2023