



ENTERGY

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August 9, 1994

C. R. Hutchinson
Vice President
Operations
Grand Gulf Nuclear Station

U.S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, D.C. 20555

Attention: Document Control Desk

SUBJECT: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29
Response to Violation for Failure to Follow
Procedure for Material Stored in Pools
Report No. 50-416/94-13, dated 07/12/94
(GNRI-94/00161)

GNRO-94/00103

Gentlemen:

Entergy Operations, Inc. hereby submits the response to the
Notice of Violation 50-416/94-13-01

Yours truly,

CRH/RR/
attachment
cc:

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Mr. H. W. Keiser(w/a)
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Notice of Violation 94-13-01

Technical Specification 6.8.1(a) requires that written procedures be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guides 1.33, Revision 2, dated February 1978.

Section 6.2 of Licensee Procedure 01-S-08-6, Radioactive Material Control, Revision 16, dated May 5, 1994, requires that each container or package of licensed radioactive material shall be durable and clearly labeled as radioactive material in accordance with the requirements of 10 CFR 20.1904; however, labels are not required for inaccessible containers, such as items in pools, as long as there are written records available to personnel who could remove the items from the storage locations.

Contrary to the above, the licensee failed to follow Section 6.2 of Procedure 01-S-08-6. On approximately June 15, 1994, written records to inform workers of the radiological hazards present for items stored in pools were not available to personnel who could remove the items from their storage locations.

I. **Admission or Denial of the Alleged Violation**

Entergy Operations, Inc. admits to this violation.

II. **The Reason for the Violation, if Admitted**

The Control of Miscellaneous Material in Fuel Pools is governed by 01-S-07-41. This procedure was initiated as a result of incidents associated with disintegration of material that was stored in spent fuel pools that had occurred at other facilities. The cited incidents were attributed to inadequate controls. Therefore, GGNS implemented the above procedure in order to control and inventory miscellaneous material in the upper containment and spent fuel pools.

Plant outage personnel were maintaining an inventory of stored materials; however, the written inventory records were not readily available to Health Physics personnel at the time of the inspection to identify radiological hazards that could be incurred if materials would have been removed from their storage location.

The fuel pools were posted with signs that would have prevented the handling of stored material without Health Physics consent and surveys. Furthermore, access to stored material would not have been granted without proper assessment of the radiological conditions that could be incurred during the handling of the subject material. However, we do agree that the records should have been more readily available for review.

The cause of this incident is attributed to an inadequate procedure. As aforementioned, the procedure was initiated due to operating experience reviews that identified a potential for material stored in fuel pools to disintegrate and result in possible over-exposure conditions. Therefore, the procedure was written to track the material stored in the pool.

Since there was no immediate indication that the miscellaneous material storage procedure would impact Health Physics practices, it was not required to be routed to Health Physics for cross-discipline review prior to initial issuance. As a result, 01-S-07-41 did not fully implement the requirements set forth in 01-S-08-6.

III. Corrective Steps Which Have Been Taken and Results Achieved

Meetings were conducted between Outage Management and Health Physics to resolve the issue.

The miscellaneous material storage procedure was revised to require copies of the inventory sheets and item location maps be maintained by Health Physics personnel.

Pre-existing pool area maps and postings were modified to emphasize procedural requirements for the handling of material stored in the pools.

IV. Corrective Steps to be Taken to Preclude Further Violations

We feel that the present actions will prevent recurrence; however, further evaluations are being performed to determine if additional measures are necessary for program enhancement.

V. Date of Full Compliance Will be Achieved

The above action is scheduled to be completed by November 04, 1994.