



ENTERGY

Entergy Operations, Inc.

P.O. Box 756
Port Gibson, MS 39150
Tel 601 437 2800

C. R. Hutchinson

Vice President
Operations
Grand Gulf Nuclear Station

August 29, 1994

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
Reply To A Notice Of Violation For
Inadequate Radiological Controls
Due to Personnel Error
Report No. 50-416/94-14, dated 08/05/94
(GNRI-94/00185)

GNRO-94/00113

Gentlemen:

Entergy Operations, Inc. hereby submits the response to the Notice of Violation 50-416/94-14-01.

Yours truly,

CRH
for CRH

CRH/CDH/
attachment

cc:

Mr. R. H. Bernhard(w/a)
Mr. H. W. Keiser(w/a)
Mr. R. B. McGehee (w/a)
Mr. N. S. Reynolds (w/a)
Mr. H. L. Thomas (w/o)

Mr. Stewart D. Ebnetter (w/a)
Regional Administrator
U.S. Nuclear Regulatory Commission
Region II
101 Marietta St., N.W., Suite 2900
Atlanta, Georgia 30323

Mr. P. W. O'Connor (w/a)
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Mail Stop 13H3
Washington, D.C. 20555

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Notice of Violation 94-14-01

Technical Specification 6.8.1 a requires that the applicable procedures recommended in Appendix 'A' of Regulatory Guide 1.33 regarding Radiation Protection be covered by establishing, implementing and maintaining written local procedures.

GGNS Administrative Procedure 01-S-08-2, Revision 31, Exposure and Contamination Control, requires radiation workers to:

- Paragraph 6.6.1 f - enter and exit contamination areas only through specified entry/exit points indicated by single step-off pads.
- Paragraph 6.7.1 - in any posted area, prior to entry, be aware of the radiological conditions such as radiation contamination and airborne levels.
- Paragraph 6.7.2 - review appropriate radiological survey information before entering a posted area.

Contrary to the aforementioned procedural requirements, on July 14, 1994, two chemistry technicians were observed entering and exiting a posted high contamination area without donning the required anti-contamination clothing prior to entry. Additionally, both the entry and exit were made across a clearly marked contamination area boundary and not at the step-off pad as required by procedure and in accordance with General Employee Training (GET).

I. Admission or Denial of the Alleged Violation

Entergy Operations, Inc. admits to this violation.

II. The Reason for the Violation, if Admitted

On July 14, 1994 at approximately 0930, following the completion of a surveillance which sampled the Standby Liquid Control (SLC) Tank, two plant chemists were observed departing the tank area. While returning to the chemistry laboratory, the technicians entered what they assumed to be a radiation area adjacent to the upper containment pool by stepping over the radiological rope barrier surrounding the area. Since they did not stop to read the area posting indicating that the area was a high contamination area, the technicians failed to don the required protective clothing nor contact Health Physics prior to entry. Additionally, entry to and exit from the area were not made at the step-off pad. A chemistry supervisor observing the incident, immediately instructed the technicians to exit the area. The supervisor contacted health physics personnel who performed surveys to ensure that contamination had not been spread outside the high contamination area. The chemistry technicians were escorted in booties to the RCA exit point where they were surveyed. Since no contamination was found on either person, both of the chemists were cleared.

Following the incident an investigation was performed which identified the apparent causes of the event to be:

- Inattention to detail on the part of two chemistry technicians.
- Failure to read radiological posting on the part of two chemistry technicians.

III. Corrective Steps Which Have Been Taken and Results Achieved

- General Employee Training Level II qualification was revoked for both chemistry technicians involved.
- Both technicians were denied access to the RCA until retraining was completed.
- The chemists were counseled on the importance of stopping and reading radiological postings.
- A letter was placed in each employee's file and is to remain there for a period of six months.
- A Chemistry Night Order was written to heighten awareness of all chemists regarding this incident and guidance concerning radiological postings and the associated protective clothing requirements.
- GET II requalification for the chemists involved was completed on July 19, 1994. GET II lesson plan, GE-GET2-HN-001-07, thoroughly covers items such as the purpose of a step off pad, postings for contaminated areas, entry requirements for all contaminated areas and protective clothing requirements for a contaminated area.

IV. Corrective Steps to be Taken to Preclude Further Violations

- Entergy Operations feels that, although this event represents inattention to detail and failure to read radiological postings on the part of two chemistry technicians, it is not considered a generic deficiency with the Chemistry Department nor an ongoing problem with the two individuals. Therefore, no additional corrective actions are considered necessary.