



ENTERGY

Entergy Operations, Inc.

P.O. Box 8

Rolling LA 71062

Telex 904 739 6774

R. F. Burski

Director

Nuclear Safety

Washington, D.C.

W3F1-94-0090

A4.05

PR

July 5, 1994

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Subject: Waterford 3 SES
Docket No. 50-382
License No. NPF-38
NRC Inspection Report 94-08
Reply to Notice of Violation

Gentlemen:

In accordance with 10CFR2.201, Entergy Operations, Inc. hereby submits in Attachment 1 the response to the violation identified in Appendix A of the subject Inspection Report.

If you have any questions concerning this response, please contact D.F. Litolff at (504) 739-6693.

Very truly yours,

R.F. Burski
Director
Nuclear Safety

RFB/DFL/tjs
Attachment

cc: L.J. Callan (NRC Region IV), D.L. Wigginton (NRC-NRR),
R.B. McGehee, N.S. Reynolds, NRC Resident Inspectors Office

000214
9407060240 940705
PDR ADDCK 05000382
Q PDR

JE01

ATTACHMENT 1

ENTERGY OPERATIONS, INC. RESPONSE TO THE VIOLATION IDENTIFIED IN
APPENDIX A OF INSPECTION REPORT 94-08

VIOLATION NO. 9408-01

During an NRC inspection conducted on March 6 through April 16, 1994, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

Technical Specification 6.8.1.a states, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, February 1978.

Regulatory Guide 1.33, Appendix A, Section 7, lists access control to radiation areas, including radiation work permits, as activities to be covered by procedures.

Step 4.7 of Procedure HP-001-110, Revision 13, "Radiation Work Permits," states, in part, that individuals working under a radiation work permit are responsible for reviewing the radiation work permit and observing and abiding by the radiation work permit and the radiological signs posted within the radiologically controlled area.

Contrary to the above, a containment airlock door operator entered into and worked in a posted contaminated area without a full set of protective clothing as required by the applicable radiation work permit.

This is a Severity Level IV violation (Supplement IV) (382/9408-01).

RESPONSE

(1) Reason for the Violation

Entergy Operations Inc. admits this violation and believes that the root cause was inadequate attention to details in that the containment airlock door operator failed to recognize the postings which designated the area in which he was working as a contaminated

area. Hence the operator failed to fulfill the requirement of donning full protective clothing as stated in the applicable radiation work permit (RWP 1994-6037).

It should be noted that the individual had operated the containment airlock door prior to the date of the violation, but was not required to wear full protective clothing during these shifts because at that time the area was not posted as contaminated. The applicable radiation work permit stated that protective clothing was required only in posted contaminated areas. On the date of the violation, however, due to the process of destaging containment for preparation of entering Mode 4 (Hot Shutdown), the containment airlock door area was posted as a contaminated area. The door operator, accustomed to working in the area without protective clothing, failed to recognize the change in postings and entered the area without the required protective clothing.

Entergy Operations, Inc. also admits that ineffective communication between Waterford 3 radiation protection (RP) personnel prevented the violation from being resolved immediately.

Prior to entering the containment building on April 12, 1994, during Refuel Outage 6, a radiation protection technician, accompanied by a NRC inspector, noted a containment airlock door operator not wearing rubber gloves while in a contaminated area. The operator was wearing street pants, shoe covers and a modesty shirt. The radiation protection technician directed the individual to exit the contaminated area and don rubber gloves prior to continuing work activities in the contaminated area. The RP technician then contacted the RP office to inform RP personnel of the individual's failure to be properly dressed. The individual reentered the contaminated area with only shoe covers and rubber gloves as protective clothing. After exiting the containment building, the inspector noticed that the applicable RWP required full protective clothing for workers in posted contaminated areas and brought this fact to the attention of the RP personnel. Immediate actions were taken to correct the problem.

Radiation Protection personnel did not follow up to ensure that the airlock door operator was properly dressed prior to reentering the area. They presumed that the matter had been adequately resolved when the field radiation protection technician first discovered the airlock door operator being improperly dressed. At the same time, the RP technician presumed that RP personnel would assure that the

individual was dressed properly after being directed to leave the contaminated area. More effective communication between the RP field technician and RP office personnel to ensure that the RWP protective clothing requirements had been met would have resulted in a more immediate resolution of the problem.

(2) Corrective Steps That Have Been Taken and the Results Achieved

Upon notification by the NRC inspector that the airlock door operator was in a posted contaminated area without full protective clothing, RP personnel immediately removed the individual from the area. The individual was then verbally counselled on the issue of adhering to RWP requirements.

Condition Report 94-366 was initiated to begin the corrective action process.

(3) Corrective Steps Which Will Be Taken To Avoid Further Violations

To help increase awareness and avoid such violations in the future, training sessions have been scheduled for RP personnel for the next cycle of continuing training. The training will include discussions of this violation and focus on communication and the observation of worker performance.

(4) Date When Full Compliance Will Be Achieved

Waterford 3 will be in full compliance when the RP training mentioned above is complete. The scheduled completion date of this training is October 14, 1994.