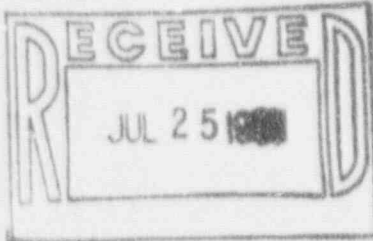


GULF STATES UTILITIES COMPANY

IVER BEND STATION POST OFFICE BOX 220 ST. FRANCISVILLE, LOUISIANA 70775

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Jul/ 19, 1991
RBG- 35,335
File Nos. G9.5, G15.4.1

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

Gentlemen:

River Bend Station - Unit 1
Refer to: Region IV
Docket No. 50-458/91-13

Pursuant to 10 CFR 2.201, this letter provides Gulf States Utilities Company's (GSU) response to the Notice of Violation for NRC Inspection Report No. 50-458/91-13. The inspection related to activities authorized by NRC Operating License NPF-47 for River Bend Station - Unit 1 (RBS). GSU's reply to the violations is provided in the attachments. Also enclosed is a check for \$37,500.00 in payment of the imposed civil penalty.

Should you have any questions or care to discuss these matters, please contact Mr. L.A. England at (504) 381-4145.

Sincerely,

J.C. Deddens
Senior Vice President
River Bend Nuclear Group

JAE/DNL/FRC/EMC/JWC/kvm

Attachments

cc: Regional Administrator
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

NRC Resident Inspector
P.O. Box 1051
St. Francisville, LA 70775

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

STATE OF LOUISIANA)

PARISH OF WEST FELICIANA)

In the Matter of)


GULF STATES UTILITIES COMPANY)

Docket No. 50-458

(River Bend Station - Unit 1)


AFFIDAVIT

J. C. Deddens, being duly sworn, states that he is a Senior Vice President of Gulf States Utilities Company; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission the documents attached hereto; and that all such documents are true and correct to the best of his knowledge, information and belief.



J. C. Deddens

Subscribed and sworn to before me, a Notary Public in and for the State and Parish above named, this 19th day of July, 1991. My Commission expires with Life.



Claudia F. Hurst
Notary Public in and for
West Feliciana Parish, Louisiana

ATTACHMENT

REPLY TO NOTICE OF VIOLATION 50-458/91-13
LEVEL III

REFERENCES

Notice of Violation - Letter from R.D. Martin to J.C. Deddens, dated June 19, 1991.

Enforcement Conference meeting summary - Letter from S.J. Collins to J.C. Deddens, dated June 10, 1991.

Inspection Report No. 50-458/91-13 - Letter from S.J. Collins to J.C. Deddens, dated May 17, 1991.

VIOLATION

A. Technical Specification 6.12.1 states, in part, that in lieu of the "control device" or "alarm signal" required by 10 CFR 20.203(c)(2), each high radiation area in which the intensity of radiation is greater than 100 mrem/hour but less than 1000 mrem/hour shall be barricaded and conspicuously posted as a high radiation area.

1. Contrary to the above, on April 1, 1991, the residual heat removal "A" pump room, a high radiation area in which the intensity of radiation was greater than 100 mrem/hour but less than 1000 mrem/hour, was not barricaded and conspicuously posted as a high radiation area. Specifically, licensee radiation protection personnel discovered that a rope barrier had been removed during a surveillance test on the same date and had not been replaced.
2. Contrary to the above, on April 28, 1991, the lower elevation of the cask wash-down area in the fuel building, a high radiation area in which the intensity of radiation was greater than 100 mrem/hour but less than 1000 mrem/hour, was not barricaded. Specifically, licensee radiation protection personnel discovered that a rope barrier to this high radiation area had been moved, leaving a portion of the entrance to this area unbarricaded.

B. Technical Specification 6.8.1 states, in part, that written procedures shall be established, implemented and maintained covering, in part, the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Appendix A of Regulatory Guide 1.33, Revision 2, cites, among activities that should be covered by written procedures, "Access Control to Radiation Areas Including a Radiation Work Permit System."

RBS procedure RSP-0200, "Radiation Work Permits," Revision 6, dated September 20, 1990, states, in part, that each worker assumes certain responsibilities for maintaining their exposure "As Low As Reasonably Achievable" and cites specific responsibilities as "complying with the requirements and instructions given on the RWP," and "being knowledgeable of the current radiological conditions at their job site."

The special conditions and requirements section of RBS Radiation Work Permits states, in part, that "personnel are to review routine survey books and/or RWP addendum sheets so as to understand radiological conditions in their work area."

Contrary to the above, on April 24, 1991, NRC inspectors observed at least three workers entering areas governed by Radiation Work Permits who did not review routine survey books and/or RWP addendum sheets which are maintained at the entrance to the areas and, therefore, did not understand or become knowledgeable of the current radiological conditions at their job sites.

GSU RESPONSE

GSU admits to the above violations.

REASONS FOR THE VIOLATION

The cause of the violation was failure by some GSU and contractor employees to adhere to radiological program procedures.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

At the time of the two violations regarding high radiation area boundaries, a multifaceted corrective action program was in progress to correct already identified problems. These actions were documented in GSU Licensee Event Reports LER 91-006 and LER 91-009 and in GSU's response to the Notice of Violation in Inspection Report 90-29 dated January 28, 1991. A task force had been formed in December 1990, to address the high radiation area boundary violation problem and the resulting recommendations were being implemented. As stated in the letter transmitting the Notice of Violation, these corrective actions included such things as replacing rope barriers with lockable barriers, a retesting program of personnel on high radiation area controls and technical specification requirements and extensive management involvement in communicating to employees the significance of the problem. Additionally, the employees involved in these two violations received varying levels of discipline.

As a result of the violation regarding employees' failure to make themselves aware of radiological conditions in the work area the following additional actions were taken:

- Personnel have been verbally notified through meetings of their responsibility to make themselves aware of radiological conditions in the radiologically controlled area (RCA). Each operations shift now documents that they have reviewed the radiation survey maps and are aware of conditions in the RCA.
- Radiation Protection technicians are now discussing radiological conditions with persons prior to entering the RCA to ensure that they are aware of radiological conditions in their work area. Additional informational postings will be placed in the plant to enhance employee awareness of radiological conditions.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Continued emphasis and vigilance by GSU management to remind and motivate the staff will comprise the major part of the ongoing corrective action. These violations are indicative of poor performance by a small number of employees. Continued reinforcement by management will be utilized as necessary.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved in the area of high radiation area boundary requirements. The cumulative corrective action and discipline has come to fruition and resulted in a heightened awareness in the staff that should prevent further problems.

The placement of additional informational postings in the RCA will be completed by September 30, 1991.