



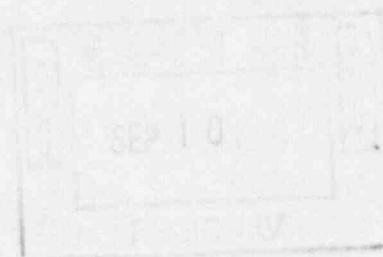
**ENTERGY**

Entergy Operations, Inc.

C. R. Hutchinson

September 5, 1996

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



Attention: Document Control Desk

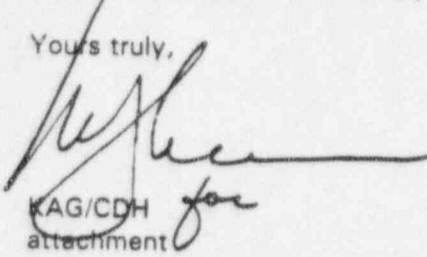
SUBJECT: Grand Gulf Nuclear Station, Unit 1  
Docket No. 50-416  
License No. NPF-29  
Reply To A Notice Of Violation  
Scaffolds Not Built In Accordance With Standard GGNS-CS-05  
Report No. 50-416/96-11(GNRI-96/00168)

GNRO-96/00101

Gentlemen:

Entergy Operations, Inc. hereby submits the response to Notice Of Violation 50-416/96-11-02.

Yours truly,

  
KAG/CDH  
attachment

cc: Mr. R. B. McGehee (w/a)  
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### Notice Of Violation 96-11-02

Criterion V of Appendix B to 10 CFR Part 50 states, in part, that activities affecting quality shall be prescribed by documented procedures and drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these procedures and drawings.

Appendix A to the Quality Assurance Program states that the licensee shall comply with the requirements of Regulatory Guide 1.29, "Seismic Design Classification." Paragraph C.2 of Regulatory Guide 1.29 requires that nonseismic structures whose failure could reduce the functioning of systems important to safety are to be constructed so that a seismic event would not cause such failure. Standard GGNS-CS-05, "Standard for Erection of Scaffolding in Safety-Related Areas," Revision 0, contained guidance to properly restrain the scaffold and specified applicable scaffold components that included footing, joints, and bracing.

Contrary to the above, on April 26 and June 8, 1996, activities affecting quality were not accomplished in accordance with prescribed procedures and drawings in that scaffolds, erected in "A" and "B" Residual Heat Removal and Low Pressure Core Spray pump rooms, were not built in accordance with Standard GGNS-CS-05.

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

Entergy Operations, Inc. admits to this violation.

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

On June 17, 1996, the resident inspector found scaffolding erected at valves E12F024A, E12F024B, and E12F012 not built in accordance with Standard CS-05. These valves are located in the Residual Heat Removal (RHR) and Low Pressure Core Spray (LPCS) pump rooms. The inspector informed the licensee, who responded by performing an immediate walkdown of the scaffolding. This walkdown also included all II/I (two-over-one) Seismic scaffolding. Quality Deficiency Report (QDR) 146-96 was initiated to document this occurrence. An Operability Review was performed due to the deficiency in the erected scaffolding. The Operability Resolution found that that the safety-related equipment would have still performed as designed.

The root cause of the deficiency was lack of adequate procedural guidance for the erection of scaffolding in the plant. Contributing causes were the utilization of scaffolding evaluations performed prior to Standard CS-05 being issued, and no requirement for independent verification to ensure scaffolding was constructed to Standard CS-05.

III. Corrective Steps Which Have Been Taken and Results Achieved

1. A walkdown was performed to ensure all seismic scaffolds were erected in accordance with Standard CS-05. Any scaffolding not in conformance was reworked.
2. Beginning immediately, an independent review is required after the completion of all II/I (two-over-one) Seismic scaffolds. All existing II/I Seismic scaffolds were inspected to ensure their compliance with Standard CS-05.
3. The Scaffold Request form was revised. The revision requires an independent review after the completion of II/I (two-over-one) Seismic scaffold to ensure the requirements of the engineering evaluation or Standard CS-05 are met.
4. All scaffolding evaluations performed prior to January 1, 1993, will not be utilized. Any evaluation made prior to this date may not be in compliance with Standard CS-05.

IV. Corrective Steps to be Taken to Preclude Further Violations

1. Plant Modification & Construction will develop and implement a Scaffold Erection procedure.

V. Date When Full Compliance Will be Achieved

The development and implementation of the Scaffold Erection procedure will be completed by September 30, 1996.