



ENTERGY

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December 4, 1992

W. T. Cottle
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 Not Providing Immediate
Access to Emergency Response Information Needed for
Accident Mitigation of Radioactive Material Shipments
Report No. 50-416/92-24, dated 11/12/92
(GNRI-92/00225)

GNRO-92/00149

Gentlemen:

Entergy Operation, Inc. hereby submits the response to the Notice of Violation 50-416/92-24-01.

This violation addressed 49 CFR 172.604(a) and the availability of immediate emergency response information for a low level radioactive waste shipment. Specifically, during an inspection on September 21 - 24, the inspectors called the emergency number listed on a radwaste shipping manifest and requested emergency information for the shipment. The requested information was supplied to the inspectors within 50 minutes.

As discussed in the enclosed response, we agree that the emergency response was not timely and feel that adequate corrective action has been taken to preclude recurrence. However, we would like to note our concern over the use of a new staff position in conducting the inspection.

To clarify the amount of time available to respond to emergency requests under 49 CFR 172.604(a), Information Notice (IN) 92-62, "Emergency Response Information Requirements for Radioactive Material Shipments," defined the term "immediate" to be 15 minutes. This IN, which was referenced in the Inspection Report that transmitted the subject violation, was dated August 24, 1992 and was received at Grand Gulf on September 15, 1992 - only a few days prior to the September 21st inspection.

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December 4, 1992
GNRO-92/00149
Page 2 of 3

The term "immediate" is applied in various nuclear regulations - an analogous situation involves 10 CFR 50.72 which requires "immediate notification" within one hour. In this respect, it is not clear that the new staff position defined in IN 92-62 received appropriate review or is consistent with other regulations. Regardless, we do not believe that the inspectors should have applied the criterion in IN 92-62 considering the short amount of time available for evaluation and implementation prior to the inspection.

Yours truly,

W F Connor

WTC/RR/
cc:

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Notice of Violation 92-24-01

10 CFR 71.5(a) requires that each licensee who delivers licensed material to a carrier for transport comply with the applicable regulations of the Department of Transportation in 49 CFR Parts 170-189.

49 CFR 172.604(a) requires, in part, that a person who offers a hazardous material for transport must provide a 24-hour emergency response telephone number for use in the event of an emergency involving the material and that the telephone number must be monitored at all times by a person who is either knowledgeable of the hazardous material being shipped and has comprehensive emergency response and incident mitigation information for that material, or has immediate access to a person who possesses such knowledge and information.

Contrary to the above, during the week of September 21 - 24, 1992, a shipment was made with an emergency response telephone number listed on the shipping papers which did not yield "immediate access" to a person in possession of comprehensive emergency response and accident mitigation information for the shipment.

I. Admission or Denial of the Alleged Violation

Entergy Operations, Inc. admits to this violation.

II. The Reason for the Violation, if Admitted

On September 23, 1992, a shipment of low level radioactive waste (Shipment 92-0910) was being shipped to the Barnwell Waste Management Facility in Barnwell, South Carolina.

The inspectors called the emergency response telephone number (GGNS Control Room) listed on the shipping manifest to ascertain compliance with 49 CFR 172.604, specifically concerning immediate access to personnel with incident mitigation information for Shipment 92-0910. Control Room personnel received the call and notified plant personnel in accordance with the appropriate plant procedure. Specific accident mitigating information was not available to the inspectors until approximately fifty minutes after the initial call.

49 CFR 172.604(a) states, in part, that the telephone number must be monitored at all times by a person who is either knowledgeable of the hazardous material being shipped and has comprehensive emergency response and incident mitigation information for that material, or has immediate access to a person who possesses such knowledge and information. The definition of "immediate" was assumed to be "within 1 hour", as described in 10 CFR 50.72. Therefore the process was designed to provide required information within this time period.

III. Corrective Steps Which Have Been Taken and Results Achieved

Plant procedures which govern shipment of radioactive material and radioactive material transportation accidents were revised to provide appropriate information to the control room for timely response in the event of an accident involving radioactive materials (other than excepted quantities) shipped from GGNS. Specifically, for each radioactive material shipment a copy of the Bill of Lading, Manifest, Prior Notification Form, and Emergency Response Instructions are required to be in the Control Room to provide the initial response information for accident mitigation. These actions were completed on September 24, 1992.