



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

JAN 4 1993

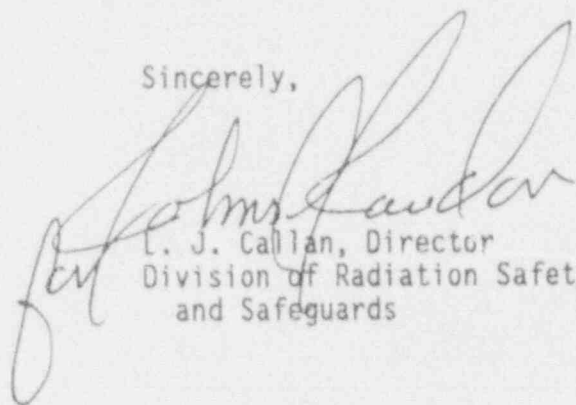
Docket Nos. 50-313
50-368
License Nos. DPR-51
NPF-6

Entergy Operations, Inc.
ATTN: J. W. Yelverton, Vice President
Operations, Arkansas Nuclear One
Route 3, Box 137G
Russellville, Arkansas 72801

SUBJECT: NRC INSPECTION REPORT 50-313/92-25; 50-368/92-25

Thank you for your letter of December 9, 1992, in response to our letter and Notice of Violation dated November 9, 1992. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,



L. J. Callan, Director
Division of Radiation Safety
and Safeguards

cc:
Entergy Operations, Inc.
ATTN: Donald C. Hintz, President &
Chief Operating Officer
P.O. Box 31995
Jackson, Mississippi 39286

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Q PDR

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Entergy Operations, Inc.

-2-

Entergy Operations, Inc.
ATTN: John R. McGaha, Vice President
Operations Support
P.O. Box 31995
Jackson, Mississippi 39286

Wise, Carter, Child & Caraway
ATTN: Robert B. McGehee, Esq.
P.O. Box 651
Jackson, Mississippi 39205

Entergy Operations, Inc.
ATTN: R. A. Fenech, General Manager
Plant Operations
Route 3, Box 137G
Russellville, Arkansas 72801

Entergy Operations, Inc.
ATTN: James J. Fisicaro
Director, Licensing
Route 3, Box 137G
Russellville, Arkansas 72801

Honorable Joe W. Phillips
County Judge of Pope County
Pope County Courthouse
Russellville, Arkansas 72801

Winston & Strawn
ATTN: Nicholas S. Reynolds, Esq.
1400 L Street, N.W.
Washington, D.C. 20005-3502

Arkansas Department of Health
ATTN: Ms. Greta Dicus, Director
Division of Radiation Control and
Emergency Management
4815 West Markham Street
Little Rock, Arkansas 72201-3867

B&W Nuclear Technologies
ATTN: Robert B. Borsum
Licensing Representative
1700 Rockville Pike, Suite 525
Rockville, Maryland 20852

Admiral Kinnaird R. McKee, USN (Ret)
214 South Morris Street
Oxford, Maryland 21654

Entergy Operations, Inc.

-3-

ABB Combustion Engineering

Nuclear Power

ATTN: Charles B. Brinkman

Manager, Washington

Nuclear Operations

12300 Twinbrook Parkway, Suite 330

Rockville, Maryland 20852

Entergy Operations, Inc.

-4-

bcc to DMB (IE06)

bcc distrib. by RIV w/copy of licensee's letter dated December 9, 1992:

J. L. Milhoan

B. Murray, DRSS/FIPS

L. T. Ricketson, FIPS

DRP

Section Chief, DRP/A

Project Engineer, DRP/A

Section Chief, DRP/TSS

DRS

MIS System

FIPS File

RIV File

Lisa Shea, RM/ALF (MS MN88 4503)

T. Alexion, NRR Project Manager (MS 13 H3)

R. Bevan, NRR Project Manager (MS 13 H3)

RIV:FIPS	C:FIPS	D:DRSS	D:DRP	
LTRicketson:nh	BMurray	LJCallan	ABBoach	
1/4/93	1/4/93	1/4/93	1/4/93	



**Entergy
Operations**

Entergy Operations, Inc.
Route 3 Box 137G
Russellville, AR 72801
Tel 501-964-3100

December 9, 1992

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U. S. Nuclear Regulatory Commission
Document Control Desk
Mail Station P1-137
Washington, DC 20555

SUBJECT: Arkansas Nuclear One - Units 1 and 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Response to Inspection Report
50-313/92-25; 50-368/92-25

Gentlemen:

Pursuant to the provisions of 10CFR2.201, attached is the response to the violation identified during the inspection of activities associated with the failure of workers to attend pre-job briefings required by Radiation Work Permits.

Should you have questions or comments, please call me at 501-964-8601.

James J. Fisicaro
Very truly yours,

James J. Fisicaro
Director, Licensing

JJF/RMC/mmj
attachment

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cc: Mr. James L. Milhoan
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064

NRC Senior Resident Inspector
Arkansas Nuclear One - ANO-1 & 2
Number 1, Nuclear Plant Road
Russellville, AR 72801

Mr. Thomas W. Alexion
NRR Project Manager, Region IV/ANO-2
U. S. Nuclear Regulatory Commission
NRR Mail Stop 13-H-3
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852

Mr. Roby B. Bevan, Jr.
NRR Project Manager, Region IV/ANO-1
U. S. Nuclear Regulatory Commission
NRR Mail Stop 13-H-3
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852

(2) Corrective steps taken and results achieved:

On October 8, 1992, a review of RWPs was conducted to determine compliance with pre-job briefing requirements. This review identified additional discrepancies relating to pre-job briefings.

For immediate corrective action, instructions were provided to radiation protection personnel on October 9, 1992, requiring all radiation workers be asked, prior to their being added to an RWP if their RWP requires a pre-job briefing. If a pre-job briefing is required, a Health Physics supervisor is required to verify that the proper documentation is completed. The supervisors are not to add individuals to an RWP that requires a pre-job briefing unless the appropriate documentation has been completed. This action will remain in-place until further actions to prevent recurrence are completed.

A memorandum issued on November 23, 1992, from the Vice President, Operations, to ANO plant personnel, re-emphasized the importance of the pre-job briefing requirements, completion of the associated documentation, and the responsibility of each individual to ensure that they have the pre-job briefing as specified by their RWP.

(3) Corrective steps which will be taken to prevent recurrence:

An evaluation of the general employee radiation worker training program has been completed. This evaluation was conducted to determine if the radiological pre-job briefing requirements are adequately communicated to radiation workers. The evaluation identified several recommendations to enhance the general employee radiation worker training program. Implementation of these recommendations will be completed by December 31, 1992.

An evaluation of the existing radiological pre-job briefing procedures has been completed. This evaluation determined that additional procedure enhancements are needed to identify, conduct, and document pre-job briefings. The necessary procedure changes to implement these enhancements will be completed by January 15, 1993.

An evaluation of the existing administrative controls available through command functions on the existing Radiological Exposure Management (REM) computer system has been completed. This evaluation determined that access to radiological controlled areas (RCA) can be restricted when pre-job briefing requirements are in effect for a specific RWP. Implementation of any necessary software modifications will be completed by March 31, 1993.

NOTICE OF VIOLATION

Unit 2 Technical Specification, 6.8.1 requires that written procedures be established, implemented and maintained covering the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978. Item 7e.(1) of Appendix "A" of Regulatory Guide 1.33, February 1978 listed access controls to radiation areas including a radiation work permit system as a procedure to be included.

Procedure 1000.031, Revision 15, "Radiation Protection Manual," required that "individuals are responsible for: ... adherence to radiological protection requirements ..." and "... being knowledgeable of and understanding the requirements and contents of the Radiological Work Permit (RWP) under which work will be performed."

Radiation Work Permit 921392 stated, "Personnel performing work governed by this Radiological Work Permit will be required to attend a radiological pre-job briefing."

Contrary to the above, on October 8, 1992, the inspector identified approximately 20 people performing work in Unit 2 governed by Radiation Work Permit 921392 who had not attended radiological pre-job briefings.

This is a Severity Level IV violation. (Supplement IV)
(368/9225-01)

Response to violation 368/9225-01

(1) Reason for the violation:

A pre-job briefing at ANO is defined as an "ALARA" tool used to minimize exposure to radiation workers, minimize radwaste generation and to reduce the amount of problems and unknowns associated with the individual job. This allows the work crew to anticipate problems that otherwise would arise at the job site in a higher radiation dose rate field.

The cause of the violation was determined to be a failure to follow procedures, related to Radiation Work Permits (RWPs), in that radiation workers failed to attend and/or document their participation in pre-job briefings as required by Health Physics (HP) procedures. Inconsistencies in the implementation and administration of pre-job briefings were considered to be contributing factors related to following RWP requirements. The primary type of radiation workers violating pre-job briefing requirements were determined to be contract personnel.

Additionally, an ongoing project to develop an improved REM computer system is in progress. The new system will provide enhancements related to the implementation, administration and development of RWP requirements.

(4) Date when full compliance will be achieved:

Full compliance was achieved on October 9, 1992, when instructions were issued to Health Physics personnel requiring confirmation that pre-job briefing requirements had been met prior to adding workers to the RWP.

Entergy Operations, Inc.

-4-

bcc to DMB (IEC6)

bcc distrib. by RIV w/copy of licensee's letter dated December 9, 1992:

J. L. Milhcan
B. Murray, DRSS/FIPS
L. T. Ricketson, FIPS
DRP
Section Chief, DRP/A
Project Engineer, DRP/A
Section Chief, DRP/TSS
DRS
MIS System
FIPS File
RIV File
Lisa Shea, RM/ALF (MS MNBB 4503)
T. Alexion, NRR Project Manager (MS 13 H3)
R. Bevan, NRR Project Manager (MS 13 H3)

RIV:FIPS	C:FIPS	D:DRSS	D:DRP	
LTRicketson:nh	BMurray	LJCallan	ABBeach	
1/4/93	1/4/93	1/4/93	1/4/93	