



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

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

JUN 26 1997

Joseph J. Hagan, Vice President
Operations - Grand Gulf Nuclear Station
Entergy Operations, Inc.
P.O. Box 756
Port Gibson, Mississippi 39150

SUBJECT: NRC INSPECTION REPORT 50-416/97-03

Dear Mr. Hagan:

Thank you for your letters (GNRO-97/00045 and GNRO-97/00049) of May 22, 1997, in response to our letter and Notice of Violation dated April 24, 1997. We have reviewed your replies and find them responsive to the concerns raised in our Notice of Violation.

In the response to Violation 50-416/9703-01, you stated: "The NOV presented the reason for the violation as personnel wanting to start their long weekend, therefore delaying initiating a CR until the following Monday. This incorrect conclusion resulted from miscommunication during a meeting between NRC inspectors and involved personnel. This has been discussed and clarified with the inspectors. Additionally, in a discussion with Mr. Pat Gwynn, Director, Division of Reactor Safety [sic], we were advised to request a review of the miscommunication issue. As such, this review is requested." Also, in discussions with your staff, your staff identified that the conclusions provided in the cover letter did not completely reflect the inspection report conclusions.

Regional management has performed the requested review, which included discussions with the inspectors who performed the inspection. A discussion was also held with the inspectors regarding the clarification that was provided by Grand Gulf personnel with respect to miscommunications that may have occurred. During this discussion, the inspectors stated that the issued inspection report accurately reflects the results. These results were discussed with K. Hughey, Director, Nuclear Safety, and D. Bost, Director, Design Engineering, of your staff on June 25, 1997, to confirm the accuracy of the inspection report.

Based on review, we have determined that the inspection report accurately describes the results of the inspection; consequently, no changes will be made to the published report. We acknowledge that the cover letter did not completely reflect the conclusions of the report related to this matter.

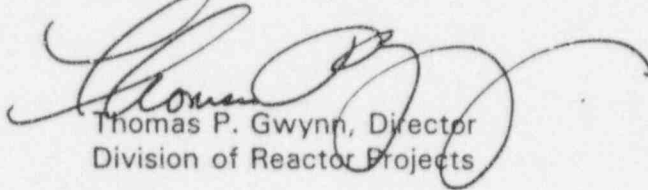
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We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,



Thomas P. Gwynn, Director
Division of Reactor Projects

Docket No.: 50-416
License No.: NPF-29

cc:
Executive Vice President
and Chief Operating Officer
Entergy Operations, Inc.
P.O. Box 31995
Jackson, Mississippi 39286-1995

Wise, Carter, Child & Caraway
P.O. Box 651
Jackson, Mississippi 39205

Winston & Strawn
1400 L Street, N.W. - 12th Floor
Washington, D.C. 20005-3502

Sam Mabry, Director
Division of Solid Waste Management
Mississippi Department of Natural
Resources
P.O. Box 10385
Jackson, Mississippi 39209

President
Claiborne County Board of Supervisors
Port Gibson, Mississippi 39150

Manager of Operations
Bechtel Power Corporation
P.O. Box 2166
Houston, Texas 77252-2166

General Manager
Grand Gulf Nuclear Station
Entergy Operations, Inc.
P.O. Box 756
Port Gibson, Mississippi 39150

The Honorable William J. Guste, Jr.
Attorney General
Department of Justice
State of Louisiana
P.O. Box 94005
Baton Rouge, Louisiana 70804-9005

Office of the Governor
State of Mississippi
Jackson, Mississippi 39201

Mike Moore, Attorney General
Frank Spencer, Asst. Attorney General
State of Mississippi
P.O. Box 22947
Jackson, Mississippi 39225

Dr. F. E. Thompson, Jr.
State Health Officer
State Board of Health
P.O. Box 1700
Jackson, Mississippi 39205

Eddie S. Fuente, Director
State Liaison Officer
Division of Radiation Health
Mississippi Department of Health
P.O. Box 1700
Jackson, Mississippi 39215-1700

Vice President
Operations Support
Entergy Operations, Inc.
P.O. Box 31995
Jackson, Mississippi 39286-1995

Entergy Operations, Inc.

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Director, Nuclear Safety
and Regulatory Affairs
Entergy Operations, Inc.
P.O. Box 753
Port Gibson, Mississippi 39150

Vice President, Operations
Grand Gulf Nuclear Station
Entergy Operations, Inc.
P.O. Box 756
Port Gibson, Mississippi 39150

JUN 26 1997

bcc to DCD (IE01)

bcc distrib. by RIV:

Regional Administrator

DRP Director

Branch Chief (DRP/D)

Project Engineer (DRP/D)

Branch Chief (DRP/TSS)

Senior Resident Inspector (River Bend)

DRS-PSB

MIS System

RIV File

Senior Resident Inspector (Grand Gulf)

DOCUMENT NAME: R:_GG\GG703AK.KDW

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GAPick;df	PHHarr	TPGwynn					
6/18/97	6/16/97	6/16/97					

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JUN 26 1997

bcc to DCD (IE01)

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RIV:PE:DRP/D	C:DRP/D	D:DRP				
GAPick;df <i>BAF</i>	PHHarr <i>[Signature]</i>	TPGwynn <i>[Signature]</i>				
6/18/97	6/18/97	6/16/97				

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Entergy

Entergy Operations, Inc.
P.O. Box 756
Port Gibson, MS 39150
Tel 601 437 6408
Fax 601 437 2795

May 22, 1997

2-1

Joseph J. Hagan
Vice President
Operations
Grand Gulf Nuclear Station

U.S. Nuclear Regulatory Commission
Mail Station P1-37
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Grand Gulf Nuclear Station
Docket No. 50-416
License No. NPF-29
Response to Notice of Violation 50-416/97-03-01, Failure to Follow Procedure
Report No. 50-416/97-03, dated 04/24/97, (GNRI-97/00C58)

GNRO-97/00045

Gentlemen:

Notice of Violation (NOV) 50-416/97-03-01 cited Grand Gulf Nuclear Station (GGNS) for failure to follow procedure in that steps contained in GGNS administrative procedure to initiate a condition report (CR) upon discovery of a deficiency were not timely.

The NOV presented the reason for the violation as personnel wanting to start their long weekend, therefore delaying initiating a CR until the following Monday. This incorrect conclusion resulted from a miscommunication during a meeting between NRC inspectors and involved personnel. This has been discussed and clarified with the inspectors. Additionally, in a discussion with Mr. Pat Gwynn, Director, Division of Reactor Safety, we were advised to request a review of the miscommunication issue. As such, this review is requested.

There were other complicating factors that led to this violation. The fact that the condition in question had been previously identified in deficiency documents as a generic issue, gave personnel the false assurance that operability had already been addressed. Additionally, the concepts of immediately and promptly are more easily defined and applied to new items of discovery and there was a general feeling that this was not a new item due to the previous history. GGNS recognizes the importance of rigorously following the non-conformance process and that required reviews may not be bypassed. As such, actions are being taken to ensure all personnel are fully aware of the procedural requirements and expectations in this area.

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May 22, 1997
GNRO-97/00045
Page 2 of 2

GGNS acknowledges that initiating the CR upon discovery of the condition would have prevented the circumstances which led to this violation. Therefore, GGNS admits to this violation and the attachment to this letter contains the GGNS response to NOV 50-416/97-03-01.

Yours truly,

Bill Eaton
for J. Hagan.

JJH/JEO/jeo

attachment

cc:

Response to Notice of Violation 50-416/97-03-01

Mr. L. J. Smith (Wise Carter) (w/a)

Mr. N. S. Reynolds (w/a)

Ms. K. D. Weaver (NRC Resident) (w/a)

Mr. J. W. Yelverton (w/a)

Mr. Ellis W. Marschoff (w/a)

Regional Administrator Region IV

U.S. Nuclear Regulatory Commission

611 Ryan Plaza Drive Suite 400

Arlington, TX 76011

Mr. J. N. Donohew, Project Manager (w/2)(w/a)

Office of Nuclear Reactor Regulation

U.S. Nuclear Regulatory Commission

Mail Stop 13H3

Washington, D.C. 20555

Notice of Violation 97-03-01

Technical Specification 5.4.1.a. states, in part, that written procedures shall be implemented covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operations)," Revision 2, February 1978.

Item 1 of Appendix A to Regulatory Guide 1.33 recommends administrative procedures covering safety-related activities.

Administrative Procedure 01-S-03-10, "GGNS Condition Report (CR)," Revision 0, Paragraph 6.1.1 stated, in part, that any individual or organization at Grand Gulf Nuclear Station shall initiate a condition report whenever a non-conformance, material non-conformance, or potential reportable event is discovered.

Contrary to the above, on February 27, 1997, a design engineer failed to implement the requirements of Procedure 01-S-03-10 in that a non-conformance was identified in the leak testing of the containment isolation valves associated with the residual heat removal system test return piping to the suppression pool and a condition report was initiated four days later, not when the non-conformance was identified.

This is a Severity Level IV violation (Supplement 1) (50-416/9703-01).

I. The Reason for the Violation, if Admitted

On March 3, 1997 a Condition Report (CR) was initiated to address Design Engineering concerns with the method for leak rate testing certain containment penetrations. Notice of Violation (NOV) 50-416/97-03-01 was issued when the NRC Resident Inspector was informed by the initiating design engineer that the condition was identified on, February 27, 1997. This was four days prior to initiation of a CR. The delay in initiating the CR did not allow Operations to perform a timely operability review.

Investigation determined that policy guidance/management expectations were not well defined or understood. Plant administrative procedure specifies that a CR be written whenever a deficiency is discovered. The importance of timely initiation of a CR was missed by persons involved in this event. Persons involved did not recognize the need for initiating a CR right away due to the fact that containment penetrations had been addressed earlier as part of a generic issue. Discussion held at the time of the decision to delay the CR concluded that no new operability concern was raised by the containment penetrations in question.

Initiating a CR upon discovery of this condition, in accordance with existing procedure, would have provided operations the opportunity to perform a timely operability review.

II. Corrective Steps Which Have Been Taken and Results Achieved

1. The Director, Design Engineering, transmitted a memo on March 27, 1997 to Design Engineering personnel defining his expectations and procedural requirements when non-conformances are identified.
2. Expectations for timely initiation of problem resolution through the CR process was discussed with GGNS personnel during the April 16, 1997 'Standdown' meeting.
3. Accountability meetings have been conducted with the individuals involved

These actions have raised the awareness of select plant personnel and clarified procedural and management expectations concerning timely initiation of CRs.

III. Corrective Steps to be Taken to Preclude Further Violations

1. Plant Management will issue a memo to plant personnel defining condition report expectations.
2. Engineering management will conduct training with engineers covering the condition report initiation process.

IV. Date When Full Compliance Will be Achieved

All actions are scheduled to be completed by June 16, 1997.



Entergy

Entergy Operations, Inc.
P.O. Box 756
Port Gibson, MS 39150
Tel 601 437 6408
Fax 601 437 2795

Joseph J. Hagan
Vice President
Operations
Grand Gulf Nuclear Station

May 22, 1997

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
Two Examples of the Failure to
Follow Radiological Protection Procedures
Report No. 50-416/97-03 (GNRI-97/00058), dated 04/24/97

GNRO-97/00049

Gentlemen:

Entergy Operations, Inc. hereby submits the response to Notice of Violation 50-416/9703-03.

Yours truly,

Bett Saton for J. Hagan.

JJH/MJL

attachment
cc:

Response to Notice of Violation 50-416/97-03-03

Mr. L. J. Smith (Wise Carter) (w/a)

Mr. N. S. Reynolds (w/a)

Ms. K. D. Weaver (w/a)

Mr. J. W. Yelverton (w/a)

Mr. Ellis W. Merschoff (w/a)

Regional Administrator

U.S. Nuclear Regulatory Commission

Region IV

611 Ryan Plaza Drive Suite 400

Arlington, TX 76011

Mr. J. N. Donohew (w/a)

Office of Nuclear Reactor Regulation

U.S. Nuclear Regulatory Commission

Mail Stop 13H3

Washington, D.C.

97-1209

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Notice of Violation 97-03-03

Technical Specification 5.4.1.a states, in part, that written procedures shall be implemented covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operations)," Revision 2, February 1978.

Item 7 of Appendix A to Regulatory Guide 1.33 recommends procedures for control of radioactivity.

Procedure 08-S-02-50, "Radiological Surveys and Surveillances," Revision 101, Section 8.6 stated, in part, that results of radiation, contamination and airborne radiological surveys are documented using an approved HP form and/or plant survey map.

Procedure 01-S-08-2, "Exposure and Contamination Control," Revision 103, Section 6.7.1 stated, in part, that all radiation workers at GGNS are required to be aware of the radiological conditions (radiation, contamination and airborne levels) in any posted area before entry.

Contrary to the above:

1. A contamination survey performed on February 27 or 28 was not documented on an approved HP form, and
2. On March 10 and March 14, the radiological area survey map that provided information to the radiological worker was not updated to include the location of the contamination area and the value of the contamination levels that were identified on Valve E22-FO94.

This is a Severity Level IV violation (Supplement IV) (50-416/97003-03).

I. Admission or Denial of the Alleged Violation

Entergy Operations, Inc. admits to this violation.

II. The Reason for the Violation, if Admitted

1. Procedures and expectations do not clearly specify which surveys should be documented. In addition, some health physics personnel place a low priority on documenting surveys that indicated no change in contamination levels, especially when the results of the survey indicate the area is not contaminated, the area is posted correctly, and the documentation as it currently exists reflects the conditions of the survey.
2. Health physics personnel did not have a consistent understanding of what is expected to be entered on wall maps. Health physics procedures and standing orders were vague and unclear as to the expectations for whether or not catch basins should go on wall maps.

III. Corrective Steps Which Have Been Taken and Results Achieved

Immediate corrective actions were:

1. The Notice of Violation (NOV) was distributed to Health Physics (HP) personnel. HP supervision also discussed the NOV with HP personnel.
2. The wall map for the room in question was updated to reflect the catch basin.

IV. Corrective Steps to be Taken to Preclude Further Violations

The following corrective actions should preclude further violations as a result of events such as the two cited in this violation:

1. Health physics personnel will ensure contaminated catch basins are documented on wall maps.
2. Health physics procedures will be updated to clarify which radiological surveys to document and information to include on wall maps.
3. The topics of documenting surveys and updating plant wall maps will be discussed at the next Health Physics Training Review Group for inclusion in the upcoming health physics training cycle.
4. Health Physics standing orders will be revised as necessary to clarify survey documentation requirements and information to include on wall maps.
5. Health physics standing orders will be reviewed for clarity.

V. Date When Full Compliance Will be Achieved

The above actions shall be completed by October 1, 1997.