



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

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ARLINGTON, TEXAS 76011-8064

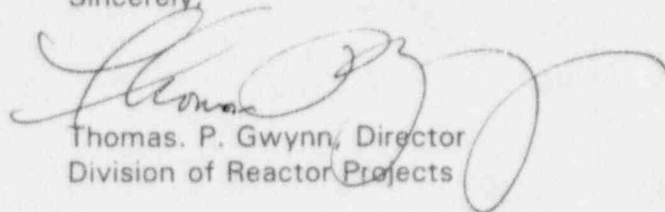
MAY 19 1997

Charles M. Dugger, Vice President
Operations - Waterford 3
Entergy Operations, Inc.
P.O. Box B
Killona, Louisiana 70066

SUBJECT: NRC INSPECTION REPORT 50-382/97-02

Thank you for your letter of April 23, 1997, in response to our letter and Notice of Violation dated March 24, 1997. Based on discussions with the radiation protection superintendent on May 9, 1997, we understand that corrective actions for the failure to perform surveys also included training to radiation protection personnel and additional surveys of containers within the protected area. 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.: 50-382
License No.: NPF-38

cc:
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-3-

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bcc to DCD (IE01)

bcc distrib. by RIV:

Regional Administrator

DRP Director

Branch Chief (DRP/D)

Project Engineer (DRP/D)

Branch Chief (DRP/TSS)

Resident Inspector

DRS-PSB

MIS System

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Regional Administrator

DRP Director

Branch Chief (DRP/D)

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5/16/97	5/16/97 <i>for</i>	5/17/97					

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**Entergy
Operations**

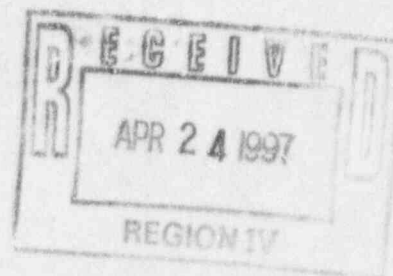
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W3F1-97-0086
A4.05
PR

April 23, 1997

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



Subject: Waterford 3 SES
Docket No. 50-382
License No. NPF-38
NRC Inspection Report 50-382/97-02
Reply to Notice of Violation

Gentlemen:

In accordance with 10CFR2.201, Entergy Operations, Inc. hereby submits in Attachment 1 the response to the violations identified in Enclosure 1 of the subject Inspection Report.

Should you have any questions concerning this response, please contact me at (504) 739-6242 or Tim Gaudet at (504) 739-6666.

Very truly yours,

E.C. Ewing
Director,
Nuclear Safety & Regulatory Affairs

ECE/GCS/tjs
Attachment

cc: E.W. Merschoff (NRC Region IV), C.P. Patel (NRC-NRR),
R.B. McGehee, N.S. Reynolds, NRC Resident Inspectors Office

97-0947

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ATTACHMENT 1

ENERGY OPERATIONS, INC. RESPONSE TO THE VIOLATION IDENTIFIED IN
ENCLOSURE 1 OF INSPECTION REPORT 9702

VIOLATION NO. 9702-07

10 CFR 20.1501 requires that each licensee make or cause to be made surveys that may be necessary for the licensee to comply with the regulations in Part 20 and that are reasonable under the circumstances to evaluate the extent of radiation levels, concentrations or quantities of radioactive materials, and the potential radiological hazards that could be present.

Pursuant to 10 CFR 20.1003, survey means an evaluation of the radiological conditions and potential hazards incident to the production, use, transfer, release, disposal, or presence of radioactive material or other sources of radiation.

10 CFR 20.1902(a) requires that the licensee post each radiation area with a conspicuous sign bearing the radiation symbol and the words "CAUTION RADIATION AREA."

Contrary to the above, as of February 18, 1997, the licensee did not perform surveys required by 10 CFR 20.1501 that resulted in a failure to post "CAUTION RADIATION AREA" signs as required by 10 CFR 20.1902(a) after transferring radioactive material to Sealand Container 21248-5.

This is a Severity Level IV violation (Supplement IV) 50-382/9702-07.

RESPONSE

(1) Reason for the Violation

The root cause of this violation is personnel error in that an individual inadvertently failed to follow the requirements of procedure HP-001-201, "Radiological Survey Techniques and Frequencies," which states that radiation surveys should be performed after job/plant evolutions are performed that may change radiation levels and when deemed necessary by Radiation Protection Supervision. In addition, as a consequence of not performing the required radiological survey, the affected area was not posted as required by procedure HP-001-219, "Radiological Posting Requirements".

The individual who was involved with this event was tasked with assisting craft personnel in preparation of refueling activities. One of his tasks involved

moving vacuum cleaners from a radioactive waste compactor building to a nearby Sealand trailer. The dose rate on one of the vacuums was 120 mr/hr on contact. In addition to this task, the individual was asked to stage an area to support work on contaminated equipment in the compactor building. The individual moved the vacuum cleaners to the Sealand trailer and then staged a contaminated area in the compactor building as requested. In his haste to stage the contaminated area in the compactor building, the individual forgot to perform a radiological survey for the area near the Sealand trailer and as a result did not post the area as required.

(2) Corrective Steps That Have Been Taken and the Results Achieved

1. The area around the Sealand container was surveyed as required and properly posted as a Radiation Area.
2. The individual who failed to perform the required survey and subsequent posting was counseled.

(3) Corrective Steps Which Will Be Taken to Avoid Further Violations

Waterford 3 believes that the above corrective steps are adequate to avoid further violations of this type.

(4) Date When Full Compliance Will Be Achieved

Waterford 3 is in full compliance.

ATTACHMENT 1

ENTERGY OPERATIONS, INC. RESPONSE TO THE VIOLATION IDENTIFIED IN
ENCLOSURE 1 OF INSPECTION REPORT 9702

VIOLATION NO. 9702-08

10 CFR 20.1904(a) requires the licensee to ensure that each container of licensed materials bears a durable, clearly visible label bearing the words "CAUTION, RADIOACTIVE MATERIAL," or "DANGER, RADIOACTIVE MATERIAL."

Contrary to the above, on February 18, 1997, a 95 cu ft container of contaminated protective clothing located behind the tool room in the protected area did not bear a label with the words "CAUTION, RADIOACTIVE MATERIAL," or "DANGER, RADIOACTIVE MATERIAL."

This is a Severity Level IV violation (Supplement IV) 50-382/9702-08.

RESPONSE

(1) Reason for the Violation

The root cause of the violation is indeterminate in that the events which led to the label not being on the 95 cu. ft container cannot be ascertained. It is clear, based on worker observation and recent self assessments of the containers, that the label was at one time affixed to the container.

There are three plausible causes of this occurrence. One cause, and possibly the most probable, is that a Radiation Protection worker removed the label to update it or to make it more legible and forgot to place a label back on the container. Another possible cause is that the adhesive on the label material was not adequate enough to maintain the label on the container while exposed to weather conditions (i.e. humidity, fluctuating temperatures, rain, etc.). Finally, an unauthorized individual may have removed the label from the container.

(2) Corrective Steps That Have Been Taken and the Results Achieved

1. The container was properly labeled with a radioactive label.
2. Radiation Protection personnel reviewed other areas and determined that no containers were missing labels.

3. Labels with higher bonding strength have been ordered to be used on the storage containers.
4. This event was discussed with appropriate Radiation Protection personnel and the importance of restoring labels on containers was emphasized.
5. W3's management discussed at an "All Hands Meeting" for site personnel that unauthorized individuals should not operate or tamper with radiological postings.

(3) Corrective Steps Which Will Be Taken to Avoid Further Violations

Waterford 3 believes that the above corrective steps are adequate to avoid further violations of this type.

(4) Date When Full Compliance Will Be Achieved

Waterford 3 is in full compliance.