



Entergy®

Entergy Operations, Inc.

River Bend Station
5485 U.S. Highway 61N
St. Francisville, LA 70775
Tel 225 381 4157
Fax 225 635 5068
dlorfin@entergy.com

David N. Lorfing
Manager-Licensing

August 30, 2010

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001

RBG-47061
RBF1-10-0134

Subject: Supplement – Reply to a Notice of Violation: EA-10-095
River Bend Station – Unit 1
Docket No. 50-458
License No. NPF-47

- Reference:
- 1) Letter from NRC to Entergy, "River Bend Station – NRC Triennial Fire Protection Inspection Report 05000458/2010006 and Notice of Violation," dated June 17, 2010 (ML101690164)
 - 2) Letter from Entergy to NRC, "Reply to a Notice of Violation: EA-10-095," dated July 19, 2010, RBG-47046
 - 3) Letter from NRC to Entergy, "Response to River Bend Station Reply to Notice of Violation EA-10-095 in Triennial Fire Protection Inspection Report 05000458/2010006," dated August 18, 2010.

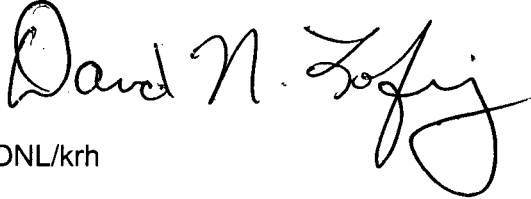
Entergy Operations, Inc. (Entergy) is providing a supplement to the Reply to Notice of Violation (NOV), EA-10-095. The Reply was originally provided in a letter from Entergy to NRC on July 19, 2010, (Reference 2). The supplemental reply was requested in a letter from NRC to Entergy dated August 18, 2010, (Reference 3). NRC requested that Entergy address our assessment of the appropriateness of the decisions to extend the schedule for completing the plant modification and to provide additional information concerning the engineering quality problems and parts availability that caused the delays in completing timely corrective actions. Entergy's supplemental reply is included in Attachment 1.

This letter includes one commitment as described in Attachment 2.

JEOL
NRC

Supplement – Reply to a Notice of Violation: EA-10-095
RBG-47061
Page 2 of 2

Should you have any questions regarding this reply, please contact me at (225) 381-4157.



DNL/krh

Attachments:

- 1) Supplement - Reply to a Notice of Violation: EA-10-095
Inspection Report 05000458/2010006-01
- 2) List of Regulatory Commitments

cc: Regional Administrator
Region IV
612 East Lamar Blvd.
Arlington, TX 76011-4125

NRC Resident Inspector
PO Box 1050
St. Francisville, LA 70775

Mr. Alan Wang, Project Manager
U.S. Nuclear Regulatory Commission
MS O-8 B1
Washington, DC 20555-0001

Attachment 1

RBG-47061

Supplement - Reply to a Notice of Violation: EA-10-095
Inspection Report 05000458/2010006-01

Attachment 1

Supplement - Reply to a Notice of Violation: EA-10-095 Inspection Report 05000458/2010006-01

Statement of Violation

License Condition 2.C.(10), "Fire Protection," requires that the licensee comply with the requirements of their fire protection program as specified in Attachment 4. Attachment 4, "Fire Protection Program Requirements," states, in part, that the licensee shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility. The fire protection program requirements are described in section 9.5.1 and appendices 9A and 9B. Section 9B.4.7 specifies, in part, "Fire protection features shall be capable of limiting fire damage so that one train of systems necessary to achieve and maintain hot shutdown conditions from either the control room or emergency control station(s) is free of fire damage."

Contrary to this requirement, in May 2007, the licensee determined that they failed to ensure that one train of systems necessary to achieve and maintain hot shutdown conditions from either the control room or emergency control station(s) was free of fire damage. Specifically, the Division 1 standby service water support system to the Division 1 emergency diesel generator, which was required to achieve safe shutdown, was not protected such that it remained free from fire damage under all conditions. The non-emergency high temperature trips for the emergency diesel generator would be disabled by design when automatically started in emergency mode due to loss of offsite power. Since standby service water could be lost due to fire damage during a control room fire, the emergency diesel generator would continue to run without cooling, and potentially fail prior to operators restoring standby service water at the remote shutdown panel. The licensee failed to promptly restore compliance in the three years since identifying the non-conforming condition, during which time the licensee has completed two refueling outages, six unplanned outages, and a planned system outage of sufficient duration. This condition was entered into the licensee's corrective action program as CR-RBS-2007-2102.

This violation is associated with Green significance determination process finding 05000458/2010006-01.

NRC Request for Supplemental Response

"... submit a supplemental response to the Notice of Violation to address your assessment of the appropriateness of the decisions to extend the schedule for completing the plant modification and to provide additional information concerning the engineering quality problems and parts availability that caused the delays in completing timely corrective actions."

Entergy Supplemental Response

The original condition and the reason for this violation were initially reported to NRC in River Bend Station (RBS) LER 2007-003 dated July 19, 2007. A condition report was written and corrective actions were identified and tracked within the RBS corrective action program. As the corrective actions included a plant modification, engineering and work planning processes

were used to engineer, plan, and schedule the modification to the emergency diesel generator (EDG) control circuitry. In addition, the scheduled completion of the corrective action was reviewed on several occasions by the plant's Onsite Safety Review Committee (OSRC). OSRC review and approval was required for extension of the modification schedule beyond a refueling outage.

On February 11, 2009, OSRC reviewed and approved extension of the scheduled modification from refueling outage 15 (RF 15) to the November 2009 EDG online maintenance outage (EDG outage). The schedule change was requested due to the design change being more complex than originally planned. The modification was split into two phases with one phase to be completed in RF 15 and the second phase in the EDG outage. The RF 15 work was to include wiring changes in the main control room panels. Other work was planned to complete the modification in the EDG outage. This extension was requested to allow for bundling of work associated with the second phase of the modification with other work already planned for the EDG outage. This was believed to be more appropriate due to the EDG online maintenance window duration being adequate to complete the modification, resource availability to complete the modification during the EDG outage, and the post maintenance testing at the end of the EDG outage needed for the modification. Risk impact of the two schedules was discussed by the OSRC. The November EDG outage was five weeks after RF 15. Scheduling the modification in the EDG outage window would not increase risk during this period of time as the EDG was already scheduled to be out of service for other work activities. By delaying the modification from the refuel outage, risk margin during RF 15 would be improved as the EDG would be available for a longer period of time. The net impact to risk based on the five week delay from the end of RF 15 to the November 2009 EDG outage was judged to be very low. OSRC approved the extension.

On November 5, 2009, RBS Condition Report (CR) 2009-5823 was written to document that the modification to the EDG was in jeopardy of not being implemented as scheduled during the November EDG outage. The engineering work had not been completed and all parts needed for the modification were not available. In addition to the unavailability of parts needed for the modification, the CR found that the modification had not been completed due to quality issues with the modification and due to work related to refuel outage 15.

On November 11, 2009, the OSRC reviewed the extension from the November 2009 EDG maintenance outage to RF 16. This delay was requested because parts were not available for the scheduled EDG outage window. The OSRC reviewed the extension request including the risk impact of an additional online EDG maintenance outage during the cycle. Two extended EDG outage windows were already planned including one for each EDG division. This was in accordance with RBS Technical Specification Bases for planned extended EDG outages. In addition, information was presented that indicated that NRC had granted enforcement discretion for issues involving multiple spurious actuations (EGM-09-002). This enforcement discretion would not require implementation of the modification until after RF 16. Based on the information provided, the extension to RF 16 was approved.

Further discussion with engineering personnel found the following information related to the engineering quality and parts availability issues. The original design concept was revised at least once early in the design change process to ensure that fire protection design requirements were met. Once the design concept was determined, detailed engineering work was planned and scheduled. Draft engineering change documentation was provided for

review just prior to RF 15 in 2009. Engineering priorities related to the outage did not allow for detailed review until after the outage. When this review was complete, multiple wiring errors were identified in the proposed change documents. Additional time was needed to correct the engineering change package. Once this was completed, a part needed for completion of the modification was determined to not be available for the scheduled work window. Delivery was not available to support the requirements of the work process.

Review of the decisions made to extend the completion of corrective actions for this violation identified the following concerns related to the decision making process for this issue.

Early in the process, schedules for the completion of the work did not account for the potential complexity of the modification and any delays that might be encountered. When the need for extension of the modification was recognized, alternative implementation schedules were not extensively evaluated. While completion in RF 15 and an additional on line outage window after November 2009 were considered, other factors had priority in the decision making process. When parts were determined to not be available, delay of the November 2009 EDG outage schedule does not appear to have been considered. In addition, the information related to enforcement discretion based on multiple spurious actuations was not challenged in detail by the OSRC. This information was subsequently found to be not applicable to this condition. While it was determined that risk impact was very low, other considerations related to prompt restoration to compliance with regulatory requirements were not thoroughly evaluated and considered.

Commitments made to correct the condition that were provided in the reply to the NOV will be implemented as stated in that reply. The action is scheduled for completion in RF 16. In addition, RBS has initiated CR 2010-4274 to address the untimely implementation of corrective actions including OSRC approval of extensions to the corrective action schedule. The corrective action will include OSRC review of this NOV, our original reply, this supplemental response, and NRC guidance related to enforcement discretion for multiple spurious actuations. In addition, OSRC will review NRC guidance associated with completion of prompt corrective actions in Regulatory Issue Summary 2005-20 and in RBS commitments to 10 CFR 50 Appendix R.

Attachment 2
List of Regulatory Commitments

The following table identifies those actions committed to by Entergy in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

Commitment	Type (check one)		Scheduled Completion Date (If Required)
	One-Time Action	Continuing Compliance	
In addition, RBS has initiated CR 2010-4274 to address the untimely implementation of corrective actions including OSRC approval of extensions to the corrective action schedule. The corrective action will include OSRC review of this NOV, our original reply, this supplemental response, and NRC guidance related to enforcement discretion for multiple spurious actuations. In addition, OSRC will review NRC guidance associated with completion of prompt corrective actions in Regulatory Issue Summary 2005-20 and in RBS commitments to 10 CFR 50 Appendix R.	X		Implementation will be tracked in the RBS corrective action program.