UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 E LAMAR BLVD
ARLINGTON, TX 76011-4511

May 12, 2014

Mr. Eric W. Olson, Site Vice President
Entergy Operations, Inc.
River Bend Station
5485 US Highway 61N
St. Francisville, LA 70775

SUBJECT: RIVER BEND STATION - NRC EXAMINATION REPORT 05000458/2014301

Dear Mr. Olson:

On March 28, 2014, the U.S. Nuclear Regulatory Commission (NRC) completed an initial operator license examination at the River Bend Station. The enclosed report documents the examination results and licensing decisions. The preliminary examination results were discussed on March 27, 2014, with Mr. R. Gadbois, General Manager, Plant Operations, and other members of your staff. A telephonic meeting was conducted on April 9, 2014, with Mr. M. Chase, Manager, Training, who was provided with the NRC licensing decisions. A telephonic exit meeting was conducted on April 28, 2014, with Mr. S. Durbin, Superintendent, Operator Training.

The examination included the evaluation of four applicants for reactor operator licenses, one applicant for an instant senior reactor operator license, and one applicant for an upgrade senior reactor operator license. The license examiners determined that all of the six applicants satisfied the requirements of 10 CFR Part 55 and the appropriate licenses have been issued. There were no post examination comments submitted by your staff. The enclosure contains details of this report.

Additionally, the NRC identified one finding involving simulator modeling that was evaluated under the risk significance determination process as having very low safety significance (Green). Because of the very low safety significance and because it was entered into your corrective action program, the NRC is treating this finding as a non-cited violation, consistent with Section 2.3.2 of the NRC Enforcement Policy. If you contest the violation or the significance of the non-cited violation, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555-0001, with copies to the Regional Administrator, U.S. Nuclear Regulatory Commission, Region IV, 1600 E. Lamar Blvd, Arlington, Texas, 76011-4125; the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555-0001; and the NRC Resident Inspector at the River Bend Station. In addition, if you disagree with the cross-cutting aspect assigned to any finding in this report, you should provide a response within 30 days of the date of this inspection report, with the basis for your disagreement, to the Regional Administrator, Region IV, and the NRC Resident Inspector at the River Bend Station.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

Sincerely,

/RA/

Vincent G. Gaddy, Chief
Operations Branch
Division of Reactor Safety

Docket: 50-458
License: NPF-47

Enclosure:
NRC Examination Report 05000458/2014301

cc w/enclosure: Electronic Distribution for River Bend Station

U.S. NUCLEAR REGULATORY COMMISSION

REGION IV

Docket:	50-458
License:	NPF-47
Report:	05000458/2014301
Licensee:	Entergy Operations, Inc.
Facility:	River Bend Station
Location:	5485 US Highway 61N St. Francisville, LA 70775
Dates:	March 24 through April 28, 2014
Inspectors:	S. Garchow, Chief Examiner, Senior Operations Engineer T. Buchanan, Chief Examiner (Under Instruction), Operations Engineer M. Bloodgood, Operations Engineer
Approved By:	Vincent G. Gaddy Chief, Operations Branch Division of Reactor Safety

SUMMARY

ER 05000458/2014301; 03/24/2014 – 04/28/2014; River Bend Station; Initial Operator Licensing Examination Report.

NRC examiners evaluated the competency of four applicants for reactor operator licenses, one applicant for an instant senior reactor operator license, and one applicant for an upgrade senior reactor operator license at the River Bend Station.

The licensee developed the examinations using NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," Revision 9, Supplement 1. The written examination was administered by the licensee on March 21, 2014. NRC examiners administered the operating tests on March 25-28, 2014.

The examiners determined that all of the six applicants satisfied the requirements of 10 CFR Part 55, and the appropriate licenses have been issued.

A. NRC-Identified and Self-Revealing Findings

Cornerstone: Mitigating Systems

Green. Title 10 CFR Part 55.46(c)(1), “Plant-Referenced Simulators,” states, in part, “A plant referenced simulator used for the administration of the operating test…must demonstrate expected plant response to operator input and to normal, transient, and emergency conditions to which the simulator has been designed.” Contrary to this,

- Operators were unable to open the main steam isolation valves because the River Bend Station simulator did not correctly model the differential pressure across the main steam isolation valves. Because of this, the job performance measure had to be rejected and another developed.

  This modeling deficiency was entered into the licensee’s corrective action program as Condition Report CR-RBS-2014-965.

- On multiple occasions, the River Bend Station simulator randomly initiated a main turbine runback when plant conditions did not warrant this action. After unsuccessful attempts were made to resolve this modeling deficiency, the applicants were briefed to ignore this event should it occur.

  This modeling deficiency was entered into the licensee’s corrective action program as Condition Reports CR-RBS-2014-965 and CR-RBS-2014-1496.

- The River Bend Station simulator initiated a control rod drift during a scenario where plant conditions did not support this response.

After identification, the licensee entered the issue into the licensee’s corrective action program as Condition Report CR-RBS-2014-1496.

These failures of the plant-referenced simulator to demonstrate expected plant response during conditions to which the simulator has been designed to respond was a performance deficiency. The finding was more than minor because it is associated with the human performance attribute of the Mitigating Systems Cornerstone and adversely affected the cornerstone objective of ensuring availability, reliability, and capability of systems needed to respond to initiating events to prevent undesired consequences. Specifically, the incorrect simulator response could adversely affect the operating crew's ability to assess plant conditions and take actions in accordance with approved procedures. In accordance with NRC Inspection Manual Chapter 0609, "Significance Determination Process," Phase 1 Worksheets, and the associated Appendix I, "Licensed Operator Requalification Significance Determination Process (SDP)," Block 15, the finding was determined to be of very low safety significance because the deficient simulator performance did not negatively impact operator performance in the actual plant during a reportable event.

Following the operating test, it was discovered the modeling deficiencies were introduced as part of a simulator upgrade more than ten years ago and therefore, are not considered to be a reflection of current performance. The hardware failure associated with the main steam line pressure gauge was determined to have no actual operator impact and was not a generic training issue. Therefore, this finding has no cross-cutting aspect associated with it.

B. Licensee-Identified Violations

None

REPORT DETAILS

4. OTHER ACTIVITIES (OA)

4OA5 Other Activities (Initial Operator License Examination)

.1 License Applications

a. Scope

NRC examiners reviewed all license applications submitted to ensure each applicant satisfied relevant license eligibility requirements. Examiners also audited two of the license applications in detail to confirm that they accurately reflected the subject applicant's qualifications. This audit focused on the applicant's experience and on-the-job training, including control manipulations that provided significant reactivity changes.

b. Findings

No findings were identified.

.2 Examination Development

a. Scope

NRC examiners reviewed integrated examination outlines and draft examinations submitted by the licensee against the requirements of NUREG-1021. The NRC examination team conducted an onsite validation of the operating tests.

b. Findings

NRC examiners provided outline, draft examination, and post-validation comments to the licensee. The licensee satisfactorily completed comment resolution prior to examination administration.

NRC examiners determined the written examinations and operating tests initially submitted by the licensee were within the range of acceptability expected for a proposed examination.

.3 Operator Knowledge and Performance

a. Scope

On March 21, 2014, the licensee proctored the administration of the written examinations to all six applicants. The licensee staff graded the written examinations, analyzed the results, and presented their analysis to the NRC on March 31, 2014.

The NRC examination team administered the various portions of the operating tests to all applicants on March 25-28, 2014.

b. Findings

No findings were identified.

All applicants passed the written examination and all parts of the operating test. The final written examinations and post examination analysis may be accessed in the ADAMS system under the accession numbers noted in the attachment.

The examination team noted one generic weakness associated with applicant performance on the simulator job performance measures (JPM) section of the operating tests. The applicants displayed a weakness in performing a main steam isolation valve (MSIV) partial stroke test. The applicants were not aware that the MSIV closure alarm occurs a few seconds before dual indication and released the test pushbutton too early. Copies of all individual examination reports were sent to the facility training manager for evaluation and determination of appropriate remedial training.

.4 Simulation Facility Performance

a. Scope

The NRC examiners observed simulator performance with regard to plant fidelity during examination validation and administration.

b. Findings

Failure of the Plant Referenced Simulator to Demonstrate Expected Plant Response with Three Examples

The team identified a finding of very low safety significance (Green) involving a non-cited violation of Title 10 CFR Part 55.46(c)(1), "Plant-Referenced Simulators," with three examples.

Example 1: Inability to Open MSIV's Due to Hardware Failure

Introduction. The examiners identified one of three examples of a Green non-cited violation of Title 10 CFR 55.46(c)(1) for the failure to provide a plant-referenced simulator used for the administration of the operating test that demonstrated expected plant response. Specifically, the River Bend Station simulator did not demonstrate the expected plant response for main steam header pressure gauge MSS-PI101, used to determine pressure differential across the main steam isolation valves (MSIVs), which prevented operators from opening the MSIVs in accordance with Procedure SOP-0011, "Main Steam System," Section 4.2, "Opening MSIVs During Hot Startup/Recovery from Automatic Isolation."

This issue was entered into the licensee's corrective action program as Condition Report CR-RBS-2014-965.

Description. During exam validation the week of February 24, 2014, the examiners attempted to validate a job performance measure (JPM) wherein the operator opens the MSIVs following an automatic closure in accordance with Operating Procedure SOP-0011, "Main Steam System," Section 4.2, "Opening MSIVs During Hot Startup/Recovery from Automatic Isolation." As part of the procedure, the operator must verify that the differential pressure across the outboard MSIVs is less than or equal to 50 psid. Due to a hardware issue with the main steam header pressure gauge MSS-PI101, the differential pressure did not lower to less than or equal to 50 psid and the operator was unable to continue in the procedure.

The examiners stopped the JPM for the day and the simulator maintenance personnel recalibrated the gauge overnight. The next day, another attempt was made to validate the JPM. This time, the operator was able to open the outboard MSIVs; however, the procedure also required differential pressure across the inboard MSIVs to be less than or equal to 50 psid prior to opening. The recalibrated gauge continued to read 70 psi less than the reactor pressure and would not lower to within the requirements of the procedure. The examiners again stopped the JPM. Simulator maintenance personnel determined that the gauge needed to be replaced, which would take time. The examiners then decided to remove this JPM from the exam and replace it. The JPM was unable to be performed on multiple occasions due to the hardware issue with the main steam line header pressure gauge.

Analysis. The team determined that the failure of the plant-referenced simulator to demonstrate expected pressure response across the main steam isolation valves during conditions to which the simulator has been designed to respond was a performance deficiency. The finding was more than minor because it is associated with the human performance attribute of the Mitigating Systems Cornerstone and adversely affected the cornerstone objective of ensuring availability, reliability, and capability of systems needed to respond to initiating events to prevent undesired consequences. Specifically, the incorrect simulator response could adversely affect the operating crew's ability to assess plant conditions and take actions in accordance with approved procedures. In accordance with NRC Inspection Manual Chapter 0609, "Significance Determination Process," Phase 1 Worksheets, and the associated Appendix I, "Licensed Operator Requalification Significance Determination Process (SDP)," Block 15, the finding was determined to be of very low safety significance because the deficient simulator performance did not negatively impact operator performance in the actual plant during a reportable event. This modeling deficiency did not have any generic training implications, nor did it have any actual impact on operator performance. Therefore, the inspectors determined it did not have any cross-cutting aspect.

Enforcement. Title 10 CFR 55.46(c)(1), "Plant-Referenced Simulators," requires, in part, that a plant-referenced simulator used for the administration of the operating test must demonstrate expected plant response to operator input and to normal, transient, and accident conditions to which the simulator has been designed to respond. Contrary to the above, during exam validation the week of February 24, 2014, the River Bend Station simulator that was to be used for the administration of the operating test failed to demonstrate expected plant response to operator input and to normal, transient, and accident conditions to which the simulator had been designed to respond. Specifically,

the River Bend Station simulator did not demonstrate the expected plant response for main steam header pressure gauge MSS-PI101, used to determine pressure differential across the MSIVs, which prevented operators from opening MSIVs in accordance with Procedure SOP-0011, "Main Steam System," Section 4.2, "Opening MSIVs During Hot Startup/Recovery from Automatic Isolation."

Because this violation was of very low safety significance and has been entered into the corrective action program as Condition Report CR-RBS-2014-965, it is being treated as a non-cited violation, consistent with Section 2.3.2.a of the Enforcement Policy: NCV 05000458/2014301-01, "Failure of the Plant Referenced Simulator to Demonstrate Expected Plant Response with Three Examples." This was the first of three examples.

Example 2: Turbine Generator Perturbations During Scenario Validation and Examination Administration

Introduction. The examiners identified one of three examples of a Green non-cited violation of Title 10 CFR 55.46(c)(1) for the failure to provide a plant-referenced simulator used for the administration of the operating test that demonstrated expected plant response. Specifically, the River Bend Station simulator did not demonstrate expected main generator loading throughout the scenario on two occasions. This issue was entered into the licensee's corrective action program as Condition Reports CR-RBS-2014-965 and CR-RBS-2014-1496.

Description. During a scenario validation the week of February 24, the licensed crew noted main generator swings of approximately 600 MWe occurring. Because of the size of the perturbation, the operators decided to scram the reactor. The examiners stopped the scenario validation in an attempt to determine what had occurred. Per the simulator support staff, there were no malfunctions entered that would cause that plant response. The examiners then had the simulator staff restore the scenario to ten minutes prior to the perturbations. The examiners then had the crew recommence actions in the scenario in an attempt to complete validation of the scenario. However, approximately 20 minutes later, the main generator perturbations recurred. At that point, the examiners secured from the scenario validation. After conference with the simulator support staff, the decision was made to re-perform an initial conditions set-up file in an attempt to correct the main generator perturbation issue. The next day that scenario was successfully validated on the new initial conditions set-up file.

During the exam administration week, these main generator perturbations recurred on a different scenario. The applicant crew did not trip the reactor and the crew was able to successfully complete the scenario. Following the scenario, the simulator staff performed more troubleshooting and determined that the perturbations were likely due to a software modelling error in the high pressure turbine. Further troubleshooting would have been necessary to determine the exact nature of the software error. The examiners briefed the next applicant crew on this simulator fidelity issue so that they would not prematurely trip the reactor due to these main generator perturbations.

Analysis. The team determined that the failure of the plant-referenced simulator to demonstrate expected main generator loading throughout a proposed initial licensed operator scenario during conditions to which the simulator has been designed to respond was a performance deficiency. The finding was more than minor because it is associated with the human performance attribute of the Mitigating Systems Cornerstone and adversely affected the cornerstone objective of ensuring availability, reliability, and capability of systems needed to respond to initiating events to prevent undesired consequences. Specifically, the incorrect simulator response could adversely affect the operating crew's ability to assess plant conditions and take appropriate corrective actions. In accordance with NRC Inspection Manual Chapter 0609, "Significance Determination Process," Phase 1 Worksheets and the associated Appendix I, "Licensed Operator Requalification Significance Determination Process (SDP)," Block 15, the finding was determined to be of very low safety significance because the deficient simulator performance did not negatively impact operator performance in the actual plant during a reportable event. It was later determined the modeling deficiency had originated over ten years ago and had not manifested itself due to the unique set of circumstances required for it to occur. Due to this, it is not reflective of current plant performance and, therefore, does not have a cross-cutting aspect.

Enforcement. Title 10 CFR 55.46(c)(1), "Plant-Referenced Simulators," requires, in part, that a plant-referenced simulator used for the administration of the operating test must demonstrate expected plant response to operator input and to normal, transient, and accident conditions to which the simulator has been designed to respond. Contrary to the above, during exam validation the week of February 24, 2014, and during exam administration the week of March 24, 2014, the River Bend Station simulator that was to be used for the administration of the operating test failed to demonstrate expected plant response to operator input and to normal, transient, and accident conditions to which the simulator had been designed to respond. Specifically, the River Bend Station simulator's initial conditions set-up for an initial license operating test scenario did not demonstrate expected main generator loading throughout the scenario.

Because this violation was of very low safety significance and has been entered into the corrective action program as Condition Reports CR-RBS-2014-965 and CR-RBS-2014-1496, it is being treated as a non-cited violation, consistent with Section 2.3.2.a of the Enforcement Policy: NCV 05000458/2014301-01, "Failure of the Plant Referenced Simulator to Demonstrate Expected Plant Response with Three Examples." This was the second of three examples.

Example 3: Unexpected Control Rod Drift

Introduction. The examiners identified one of three examples of a Green non-cited violation of Title 10 CFR 55.46(c)(1) for the failure to provide a plant-referenced simulator used for the administration of the operating test that demonstrated expected plant response. Specifically, the River Bend Station simulator modeled a control rod drift of one notch during a scenario where plant conditions did not support this response. This issue was entered into the licensee's corrective action program as Condition Report CR-RBS-2014-1496.

Description. During exam administration week, at the end of a scenario, the at-the-controls operator began to insert control rods as required per Emergency Operating Procedure EOP-0005, “Enclosures,” Enclosure 14, “Defeating RC&IS Interlocks and Emergency Control Rod Insertion Data Sheet.” When the applicant selected the first rod, control rod 36-45, he noted that the rod drifted out one notch from its previous position. The applicant mentioned this to a member of the facility staff. After the scenario was complete, the simulator staff attempted to recreate this occurrence. The staff noted that when the rod group button was pressed, all the control rods in that group were in their expected positions; however, once a single rod in that group was selected, it would drift out of the reactor one notch from its previous position. Based on simulated plant conditions at the time of these drifts, a rod drift should not have occurred and was unexpected. As of the end of the examination administration week, the licensee had not determined the cause of the unexpected control rod drifts.

Analysis. The team determined that the failure of the plant-referenced simulator to properly indicate control rod status was a performance deficiency. The finding was more than minor because it is associated with the human performance attribute of the Mitigating Systems Cornerstone and adversely affected the cornerstone objective of ensuring availability, reliability, and capability of systems needed to respond to initiating events to prevent undesired consequences. Specifically, the incorrect simulator response could adversely affect the operating crew’s ability to assess plant conditions and take actions in accordance with approved procedures. In accordance with NRC Inspection Manual Chapter 0609, “Significance Determination Process,” Phase 1 Worksheets, and the associated Appendix I, “Licensed Operator Requalification Significance Determination Process (SDP),” Block 15, the finding was determined to be of very low safety significance because the deficient simulator performance did not negatively impact operator performance in the actual plant during a reportable event. The control rod drift in this scenario was a unique occurrence and did not have an impact on the exam. While the cause of the control rod drift has not yet been confirmed, it is believed the modeling deficiency had originated over ten years ago during a simulator upgrade and not manifested itself due to the unique set of circumstances required for it to occur. Due to this, it is not reflective of current plant performance and, therefore, does not have a cross-cutting aspect.

Enforcement. Title 10 CFR 55.46(c)(1), “Plant-Referenced Simulators,” requires, in part, that a plant-referenced simulator used for the administration of the operating test must demonstrate expected plant response to operator input and to normal, transient, and accident conditions to which the simulator has been designed to respond. Contrary to the above, during exam administration the week of March 24, 2014, the River Bend Station simulator that was to be used for the administration of the operating test failed to demonstrate expected plant response to operator input and to normal, transient, and accident conditions to which the simulator had been designed to respond. Specifically, the River Bend Station simulator modeled a control rod drift of one notch during a scenario where plant conditions did not support this response.

Because this violation was of very low safety significance and has been entered into the corrective action program as Condition Report CR-RBS-2014-1496, it is being treated

as a non-cited violation, consistent with Section 2.3.2.a of the Enforcement Policy: NCV 05000458/2014301-01, "Failure of the Plant Referenced Simulator to Demonstrate Expected Plant Response with Three Examples." This was the third of three examples.

.5 Examination Security

a. Scope

The NRC examiners reviewed examination security for examination development during both the onsite preparation week and examination administration week for compliance with 10 CFR 55.49 and NUREG-1021. Plans for simulator security and applicant control were reviewed and discussed with licensee personnel.

b. Findings

No findings were identified.

4OA6 Meetings, Including Exit

The chief examiner presented the preliminary examination results to Mr. R. Gadbois, General Manager, Plant Operations, and other members of the staff on March 27, 2014. A telephonic exit was conducted on April 28, 2014, between Mr. S. Garchow, Chief Examiner; Ms. T. Buchanan, Chief Examiner Under Instruction; and Mr. S. Durbin, Superintendent, Operator Training.

The licensee did not identify any information or materials used during the examination as proprietary.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee Personnel

R. Gadbois, General Manager, Plant Operations
B. Mashburn, Director, Engineering
M. Chase, Manager, Training
J. Clark, Manager, Regulatory Assurance
T. Schenk, Manager, Operations
D. Yoes, Manager, Nuclear Oversight (Acting)
G. Degraw, Superintendent, Training
S. Durbin, Superintendent, Operator Training
G. Krause, Shift Manager
D. Looney, Sr. Simulator Specialist
D. Bergstrom Sr., Operations Instructor
G. Dempsey, Sr., Operations Instructor
D. Williamson, Sr. Licensing Specialist

NRC Personnel

G. Larkin, Senior Resident Inspector
A. Barrett, Resident Inspector

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened and Closed

05000458/2014301-01	NCV	Failure of the Plant Referenced Simulator to Demonstrate Expected Plant Response with Four Examples (Section 4OA5)

ADAMS DOCUMENTS REFERENCED

Accession No. ML14111A356 - FINAL WRITTEN EXAMINATION
Accession No. ML14111A407 - FINAL OPERATING TEST
Accession No. ML14112A080 - AS GIVEN OPERATING TEST
Accession No. ML14111A370 - POST EXAM ANALYSIS-COMMENTS

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Sincerely,

/RA/

Vincent G. Gaddy, Chief
Operations Branch
Division of Reactor Safety

Docket: 50-458
License: NPF-47

Enclosure:
NRC Examination Report 05000458/2014301

cc w/enclosure: Electronic Distribution for River Bend Station

ADAMS ACCESSION NUMBER: ML14133A700

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