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

April 28, 2016

EA-15-140

Mr. William F. Maguire
Site Vice President
Entergy Operations, Inc.
River Bend Station
5485 U.S. Highway 61N
St. Francisville, LA 70775

SUBJECT: SUMMARY OF REGULATORY CONFERENCE TO DISCUSS SAFETY SIGNIFICANCE OF RIVER BEND STATION CONTROL BUILDING CHILLED WATER SYSTEM APPARENT VIOLATION

Dear Mr. Maguire:

On April 4, 2016, members of the U.S. Nuclear Regulatory Commission (NRC) staff met with representatives of the River Bend Station to discuss an apparent violation related to maintenance on a system that provides cooling to the control room as documented in NRC Inspection Report 05000458/2015010, issued on February 16, 2016 (ML16047A268). The focus of the regulatory conference was a discussion of information important to characterize the safety significance of the finding associated with the control building chilled water system. The discussion included methodologies used by Entergy to determine realistic control room heat loads and develop an estimate of the control room heatup rate, taking into account control room habitability for operators and equipment design temperature limits. The discussion also included differences between the NRC and River Bend Station's probabilistic risk assessment methodologies used to evaluate the finding.

The NRC staff asked questions during this regulatory conference, with some questions requiring additional information that was supplied after the conference was completed. The NRC will continue to review the information that you provided during the Regulatory Conference and the subsequent information that was requested in order to reach a final significance determination. We will issue a final significance determination letter to you when that review has been completed.

This Category 1 public meeting was attended by one member of the public at the Region IV office, as well as several members of the public on the teleconference bridge that was provided. A copy of your presentation slides is included as Enclosure 1. Copies of the NRC slides (Enclosure 2) and meeting attendance lists (Enclosure 3) are also included.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be available electronically for public inspection in the NRC's Public Document Room or from the Publicly Available Records (PARS) component of the NRC's 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/

Gregory G. Warnick, Branch Chief
Project Branch C
Division of Reactor Projects

Docket No.: 50-458
License No.: NPF-47

Enclosures:
1. RBS Presentation Slides
2. NRC Slides
3. Meeting Attendance Forms

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DISTRIBUTION
See next page

ADAMS ACCESSION NUMBER: ML16119A342

■ SUNSI Review By: CHY		ADAMS ■ Yes ☐ No	■ Publicly Available ☐ Non-Publicly Available		■ Non-Sensitive ☐ Sensitive		Keyword: NRC-002
OFFICE	SPE:DRP/C	BC:DRP/C					
NAME	CYoung	GWarnick					
SIGNATURE	/RA/	/RA/					
DATE	4/21/16	4/28/16					

OFFICIAL RECORD COPY

Letter to William F. Maguire from Gregory G. Warnick dated April 28, 2016

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ROPreports

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RIVER BEND STATION REGULATORY CONFERENCE

Maintenance Rule (a)(4) Violation during Control Building Cooling Divisional Maintenance Outages

April 4, 2016

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OPENING REMARKS

Bill Maguire
Site Vice President
River Bend Station

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INTRODUCTION

Sergio Vazquez
Director, Engineering
River Bend Station

Agenda

Introduction	Sergio Vazquez – Director, Engineering
Overview – HVK and HVC System	Kevin Fancher – HVAC System Engineer
Loss of Control Room Building Cooling - March 9, 2015	Steve Carter – Shift Manager, Operations Tim Gates – Asst. Manager, Operations
Engineering Analysis of Loss of Control Room Cooling	Sergio Vazquez – Director, Engineering
Main Control Room Habitability and Equipment Survivability	Sergio Vazquez – Director, Engineering
Risk Significance	Wayne Schmidt - PRA Consultant

Enclosure 1

Efforts to Understand the Issue

As a result of the March 9, 2015, Loss of Control Building Ventilation during Refueling Outage surveillance testing and the subsequent NRC involvement, RBS has:

- Developed a much greater understanding of the event
- Evaluated the impacts if the event would have occurred during operation
- Addressed issues with indicated Main Control Room (MCR) temperature
- Changed procedures to enhance operator response
- Completed extensive engineering and Probabilistic Risk Assessment (PRA) evaluations

New Understandings

We recognized that communication of technical detail to the NRC failed to meet our standards.

- MCR Heatup on March 9, 2015, was not as pronounced as originally portrayed to the NRC
- The Design Heatup calculation originally presented to the NRC did not represent the actual heatup on March 9, 2015, nor was it based on realistic best-estimate MCR heat loads
- GOTHIC calculations included technical errors that NRC pointed out

Assessment Actions

- Determined realistic MCR heat loads and heat-up rates
- Assessed that available operator actions would be effective to limit the increase in temperature to within design limits
- Validated that there would be no impact on MCR Habitability and Equipment Survivability if temperature was maintained within design limits
- Revised the PRA model to include the potential impact of not keeping MCR temperature within design limits
- Used the revised model to determine that the risk deficit, as applied in Appendix K of the NRC's Significance Determination Process, for each HVK/HVC divisional outage in 2014, was below the 1E-6 increase in Core Damage Probability

Root Cause Actions

- Improving fleet procedure (EN-WM-104) to include guidance considering planned maintenance on Maintenance Rule (a)(1) systems
- Revised site procedure (ADM-0096) to improve risk management
- Educating key personnel on changes to risk management to ensure experience from HVK issue is internalized and applied programmatically
- Site Sr. Leadership held accountable for effective alignment of the organization and implementation of risk management procedures

RBS Significance

Five key areas:

1. Detailed Analysis of March 9, 2015, Loss of Control Building (CB) Ventilation including the actions of the Operators
2. Newly developed Engineering Analysis to determine realistic heat loads and develop estimate of MCR heatup rates
3. Control Room Habitability and Equipment Survivability Analysis
4. Revised RBS PRA model that includes the MCR Cooling Function of HVK/HVC
5. Comparison of RBS Risk Analysis Method to the SPAR method

The Risk Deficit was of very low significance.

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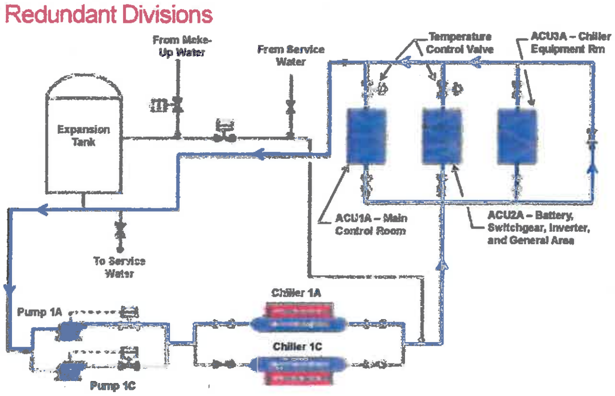
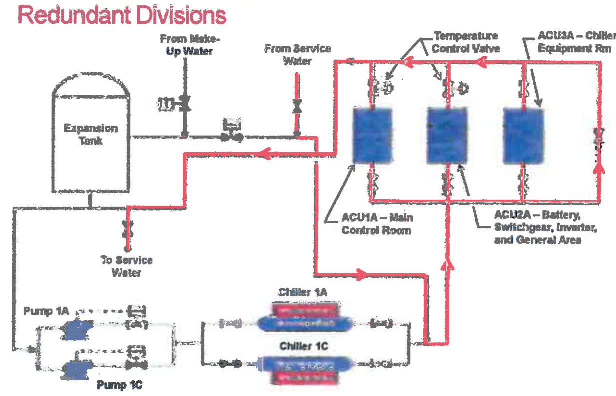
OVERVIEW – HVK AND HVC SYSTEM

Kevin Fancher
HVAC System Engineer
River Bend Station

HVK Diagram – Normal Flow Path for 1 of 2 Redundant Divisions



HVK Diagram – Alternate Flow Path for 1 of 2 Redundant Divisions



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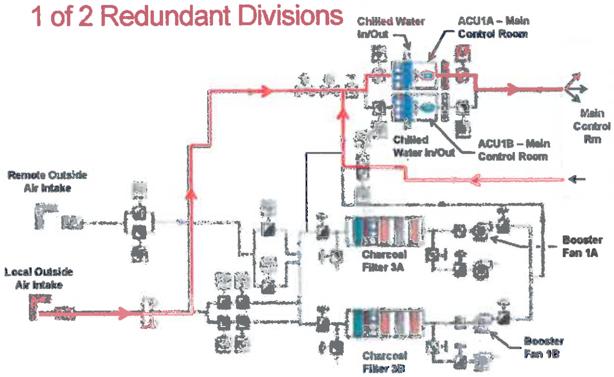
HVC Diagram – Normal Flow Path – 1 of 2 Redundant Divisions



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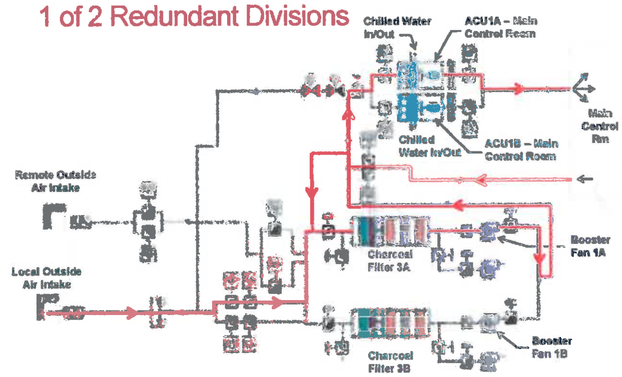
HVC Diagram – Emergency Flow Path - 1 of 2 Redundant Divisions



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LOSS OF CONTROL BUILDING COOLING MARCH 9, 2015

Steve Carter
Shift Manager, Operations

Tim Gates
Asst. Manager, Operations

River Bend Station

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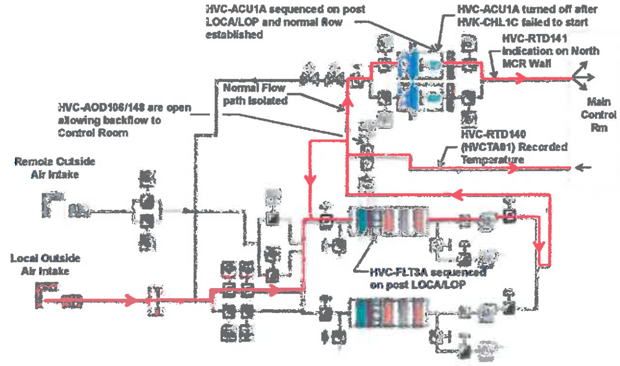
Loss of Control Building Cooling

- Initial Plant Conditions
  - Refueling Outage underway
  - Reactor in Mode 5 with cavity flooded
  - Division 2 Shutdown cooling in service
  - Initial MCR Temperature 64.5ºF.
- Division 1 – Emergency Core Cooling System (ECCS) Test in progress
  - Loss of Offsite Power/Loss of Coolant Accident (LOP/LOCA) portion
  - Division 2 HVK/HVC locked out to prevent start
  - HVK-Chiller A tagged out
  - HVK Chiller C running with Division 1 Air Conditioning Units (ACUs).

Loss of Control Building Cooling

- On LOP/LOCA initiation, all actuations occurred as expected except HVK Chiller C did not sequence back onto the safety bus and restart.
- Control Room Fresh Air (CRFA) Train A started and HVC system shifted to Emergency Mode.

March 9, 2015 Event



Operator Response to Loss of MCR Air Conditioning

- On March 9, 2015, the operators entered AOP-0060, "Loss of Control Building Ventilation" (Rev 9, dated 6/17/14).
  - MCR Back Panel doors were opened
  - Switchgear (SWGR) Room Doors were opened

MCR Layout

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Operator Response to Loss of MCR Air Conditioning

- The following parallel activities were directed:
  - Outage Control Center was engaged to support HVK recovery
  - Crew briefed for alignment of service water to HVK
  - Operator staged to support alignment of service water to HVK via the cross-tie valves
  - Staged FLEX cooling fans

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Operator Response to Loss of MCR Air Conditioning

- The Operating Crew:
  - Executed the abnormal operating procedures
  - Prepared to act on the indications if MCR temperature reached 100°F
  - Prepared to line up service water to chill water system
  - Established contingency actions that would be taken if the chiller could not be restored

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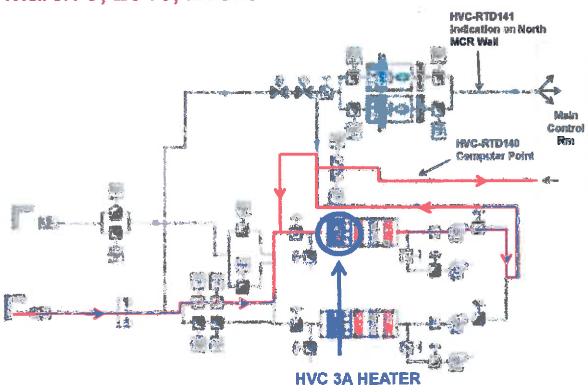
March 9, 2015, Event



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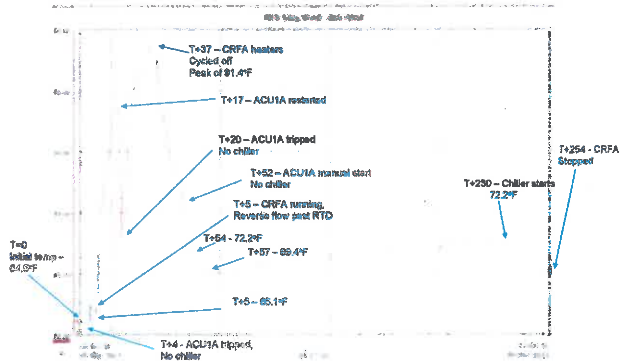
Event Reconstruction
March 9, 2015 – MCR Return Duct Temperature Trend



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MCR Habitability on March 9, 2015

During the March 9, 2015, Loss of Control Building Cooling:

- The Shift Manager and the plant management team were aware of and were continuously evaluating any potential effects of the elevated temperatures on the operating crew.
- The potential for heat stress and reliefs were discussed.
- Operators manually started HVC-ACU1A to restore MCR air circulation.

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Decision Not to Open Service Water (SW) Valves to HVK

- Operators were prepared to complete the action
- Decision to not align SW to chill water was based on conditions in the MCR

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Loss of MCR Cooling at Power with Division of HVK Out of Service

- Condition does not result in automatic SCRAM
- Condition does not require a manual reactor SCRAM
- The Operators would have:
  - Entered TS 3.7.3.B – both divisions of HVK inoperable
  - Entered AOP-0060 to restore cooling to the MCR and Control Building
  - Entered TS 3.7.2 E - both trains of CRFA inoperable
  - Engaged support staff to correct the condition.
  - Begun a normal plant shutdown per TS 3.7.2.E

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ENGINEERING ANALYSIS OF LOSS OF MCR COOLING

Sergio Vazquez
Director, Engineering
River Bend Station

Summary of Engineering Activities

- Overall analysis and testing of actual MCR heat loads indicates that the realistic heat load is approximately 57% of the design value.
  - The realistic heat load calculations were performed to determine the estimated MCR heat-up under several conditions
  - Time to reach the Technical Specification limit of 104°F
  - Time to reach the equipment design temperature of 122°F with panel doors open

Conclusions

- MCR would be habitable
- Electrical equipment would survive
- The new calculations demonstrated the ability of operator actions to limit the effect of MCR heat-up
- More time available for operator actions to be taken (1 hr → 6 hrs)

Realistic Heat Load Determination

- Actual measurement of air flow and temperature were used to estimate the actual heat load being removed by MCR ACU, during normal 100% power operation.
  - The realistic MCR heat loads are substantially less (56.7%) than the heat loads derived from design basis information used in the GOTHIC heatup calculations.
  - This estimate bound the heatup observed on March 9, 2015.

Calculation of Realistic MCR Heatup

- GOTHIC was used to estimate the actual heatup of the MCR assuming:
  - all cooling was lost
  - the effects at 6 hours of the SW alignment with an ACU running or the starting of the MCR Smoke Removal Fan and removal of the ceiling tiles
- NRC issues with the GOTHIC model for the MCR have been addressed

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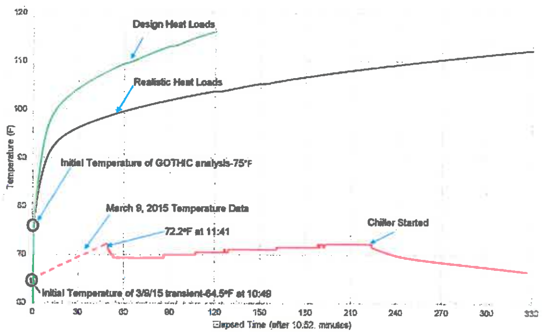
MCR Heatup Estimates



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MCR HABITABILITY AND EQUIPMENT SURVIVABILITY

Sergio Vazquez
Director, Engineering
River Bend Station

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MCR Cooling

Successful Operator actions to limit the heat-up:

- Maintain the MCR habitable
- Ensure that electrical equipment remains functional

In the unlikely event that actions to limit the MCR temperature are not successful:

- Shift Manager would direct "Shutdown from Outside the MCR" in accordance with AOP-0031

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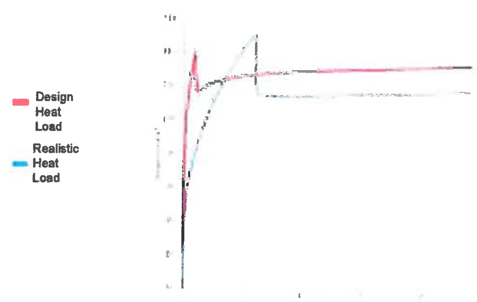
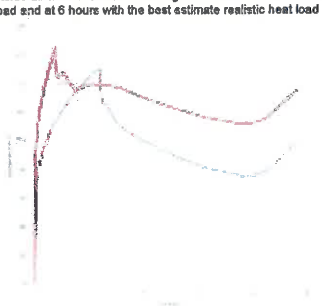
MCR Temperature following Loss of MCR Cooling (Preferred Method)

SW at 95°F aligned to ACU1(A) or B: at 1 Hour with the Design Heat Load and at 8 hours with the best-estimate realistic heat load



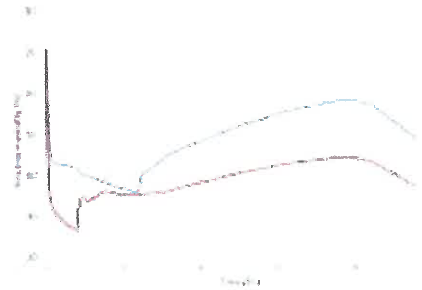
MCR Temperature following Loss of MCR Cooling (Secondary Method)

Installed Smoke Removal Fan Started with MCR doors open to stairwell with lower outside door open and outside air at 96°F and MCR ceiling tiles removed: at 2 hours with the Designed Heat Load and at 6 hours with the best estimate realistic heat load



MCR Relative Humidity following Loss of MCR Cooling

Installed Smoke Removal Fan Started with MCR doors open to stairwell with lower outside door open and outside air at 96°F and MCR ceiling tiles removed: at 2 hours with the Designed Heat Load and at 6 hours with the best estimate realistic heat load

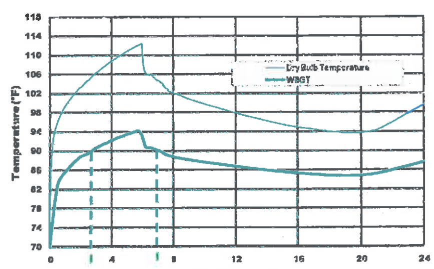


MCR Habitability

- Operators are trained on Procedure EN-IS-108, "Working in Hot Environments" for heat stress guidance.
- EN-IS-108 uses Wet Bulb Globe Temperature (WBGT) to quantify heat stress conditions.
- The stay times per EN-IS-108 are conservative or consistent with other industry standards.

WBGT & Stay Times

Realistic Heat Loads Case:
- Smoke removal system at 6 hours,
- Removing ceiling tiles at 6.5 hours.



EN-IS-108 Excerpt (low demand work)

WBGT	Stay Time (min)
[illegible]	[illegible]
[illegible]	[illegible]
[illegible]	[illegible]
[illegible]	[illegible]

- Stay times are required above 90 degrees (approximately 5 hours).
- If ventilation was <u>started at 4.5 hours</u>, operators would not need to leave the MCR to follow stay time recommendations.

MCR Equipment Survivability

- MCR Electrical Equipment Design Temperature is 122˚F
  - This applies to electrical equipment, including instruments that provide MCR indication.
  - MCR maximum specified humidity is 70%.
- 104˚F Technical Specification limit on general MCR ambient air temperature gives the operators time to take actions to ensure that the MCR design temperature is not exceeded.
- Assuming successful operator action, MCR design temperature will not be exceeded.
- In accordance with AOP-0060, opening back panel doors, per NUMARC 87-00, allows adequate air mixing and internal panel temperatures will be in equilibrium with MCR ambient air temperature.

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RISK SIGNIFICANCE

Wayne Schmidt
PRA Consultant
River Bend Station

Risk Analysis Summary

Quantitatively the Incremental Core Damage Probability (ICDP) Deficit, associated with the MCR cooling safety function, for each HVK/HVC divisional outage during 2014, was very low << 1E-8.

- Assumed design heat load – using best-estimate heat load the risk deficits would be even lower.

Several influential differences between the RBS and the NRC Risk Assessment:

1. ICDP calculated for HVK/HVC impact on MCR cooling safety function.
2. Higher success probabilities for Human Actions to limit MCR heatup.
3. Application of the Maintenance Rule (a)(4) Performance Deficiency SDP
4. PRA Modeling and Assumptions

PRA Quantification of MCR Cooling Safety Function

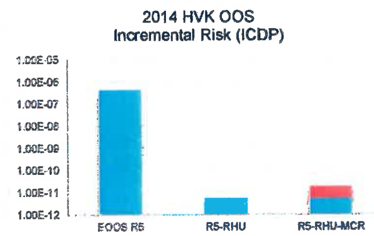
- Revision 5 (R5) - RBS PRA Model used in EOOS
  - Models HVK & HVC safety function for SWGR room cooling
  - Does not credit Service Water cooling for HVC ACU 2A/B
- R5-RHU (RHU model) – includes refined SWGR heatup analyses and detailed equipment survivability studies
  - More time is available for operators to open Div. 1 and 2 SWGR room doors. No action required for Div. 3 SWGR room
  - Allows credit for aligning Service Water to ACU 2A/B
- R5-RHU-MCR - (MCR model) includes MCR heatup based on the design heat loads
  - Credits operator actions to provide alternate MCR cooling:
    - align Service Water to MCR ACU 1A/B (Preferred)
    - use of Smoke Removal Fan and Removing Ceiling Tiles (Secondary)
  - Allows quantification of ICDP by conservatively assuming that if cooling not established – after 1-hour operator MCR actions would fail.

Comparison of Annual CDF Results

	Zero Maintenance CDF	Delta-CDF HVK Div. 1 (A and C) and Div. 2(B) Chillers out of service	
R5 (EOOS)	8.6E-07	6.8E-06	790% increase
R5-RHU	7.5E-07	<< 1E-8	<<1% increase
R5-RHU-MCR	7.6E-07	<< 1E-8	<<1% increase

- R5-RHU realistic modeling significantly reduced HVK/HVC Core Damage Frequency (CDF) contribution related to loss of SWGR cooling.
  - Strongly affected by the increased chance of successful SWGR alternate cooling methods and the removal of Division 3 AC SWGR dependency on HVK/HVC cooling
- R5-RHU-MCR - HVK/HVC safety function for MCR cooling:
  - Small increase in Baseline CDF relative to R5-RHU
  - MCR heatup is not a significant contributor
  - Validates the screening of a loss of MCR cooling from the RBS PRA model as a non-risk-significant contributor

Cumulative MCR ICDP Deficit during 2014 HVK/HVC Divisional Outages



Assuming the cumulative 25 days that one division of HVK/HVC was out of service (OOS), the Calculated Risk Deficit, comparing R5-RHU to R5-RHU-MCR, is <<E-09. The actual individual configuration Risk Deficits, if considered specifically, would be even lower.

Human Reliability Analysis (HRAs)

Action	NRC Failure Probability Values used in the Inspection Report (SPAR-H method)	RBS Design Heat Load Failure Probability used in the MCR PRA
Failure to Align Preferred Method of Service Water to HVC-ACU 1A/B	5.06E-1 (SPAR-H with Diagnosis needed) 6E-3 (SPAR-H without Diagnosis)	6.3E-02 (1HR)
Failure to Align Secondary Method of Starting Smoke Removal Fans and Remove Ceiling Tiles	5.02 E-1	3.0E-1 (2HR)
Failure to Recover MCR Cooling Using Alternate Methods	(5.06E-1)-*5.02E-1 = 2.5 E-1 (with Diagnosis) (6E-3) *0.5 = 3E-3 (without Diagnosis)	(6.3E-2)* 3.0E-1 = 1.9E-2

HRAs With Best-Estimate MCR Heatup

Action	RBS Design Heat Load Failure Probability used in the MCR PRA	RBS Best-estimate Heat Load Failure Probability determined using SPAR-H method
Failure to Align Preferred Method of Service Water to HVC-ACU 1A/B	6.3E-02 (1HR)	2.8E-3 (6HR)
Failure to Align Secondary Method of Starting Smoke Removal Fans and Remove Ceiling Tiles	3.0E-1 (2HR)	5.12E-02 (6-HR)
Failure to Recover MCR Cooling Using Alternate Methods	1.9E-2	1.54E-4

Application of Maintenance Rule (a)(4) Performance Deficiency SDP

NRC

1. Calculated a cumulative incremental MCR heatup risk deficit for the 25 days that the 35 individual HVK divisional outages maintenance configurations comprised during 2014. This cumulative result was then compared to the 1E-6 Incremental Core Damage Probability (ICDP) deficit metric, allowed for each of the 35 maintenance configurations.
2. Fire risk for these issues is calculated and added to the ICDP cumulative total.

RBS

1. The ICDP deficit for each of the 35 individual HVK divisional outages maintenance configurations during 2014 would be << 1E-8.
2. No additional fire risk included. The fire risks associated with each HVK divisional outage was properly assessed and managed with Fire Risk Management Actions, consistent with NRC requirements and industry practice for implementation Maintenance Rule (a)(4).

PRA Models and Assumptions

NRC

1. The RBS SPAR model includes a loss of the Div. 1 safety-related 4160 volt AC bus (Loss of Medium Voltage Bus [LOMVB]) as an Initiating Event.
2. Reduced the credit for recovery of HVK/HVC from 6.0E-3 to 2.5E-1, apparently due to issues evaluated as of low safety significance in a separate Performance Deficiency dealing with 480 V circuit breakers.

RBS

1. PRA never included a LOMVB as an Initiating Event. Even if one division of HVK is assumed to be out of service, a loss of power to the operating division of HVK will not result in an automatic or short-term manual SCRAM.
2. Did not increase the chance of HVK equipment failure to starts as a result of the Maintenance Rule (a)(4) Performance Deficiency.

RBS Risk Analysis Results

- Quantified ICDP Deficits associated with the MCR cooling safety function for each of the 2014 HVK/HVC divisional outages represented very low risk, using the design MCR heat load, in accordance with IMC 0609, Appendix K, SDP for this Maintenance Rule (a)(4) performance deficiency
- Each ICDP deficit was << 1E-8
- If the Best-Estimate Realistic MCR heat load were accounted for the risk deficits would be lower.

Entergy

CLOSING COMMENTS

Bill Maguire
Site Vice President
River Bend Station

U.S.NRC
United States Nuclear Regulatory Commission
Protecting People and the Environment

River Bend Station Regulatory Conference

Nuclear Regulatory Commission - Region IV
Arlington, TX
April 4, 2016

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Agenda

- Introduction of Participants
- NRC Opening Remarks
- Licensee Presentation
- NRC Caucus
- Final Questions
- Closing Remarks
- Conference Adjournment
- Questions and Comments from Members of the Public

2 *Protecting People and the Environment*

Enclosure 2

NRC PUBLIC MEETING ATTENDANCE REGULATORY CONFERENCE WITH RIVER BEND STATION	
LICENSEE/FACILITY	Entergy Operations, Inc./River Bend Station
DATE/TIME	April 4th, 2016/1:00 PM – 5:00 PM (CDT)
LOCATION	NRC Region IV Office 1600 E. Lamar Blvd. Arlington, TX 76011
NAME (PLEASE PRINT)	ORGANIZATION
PAUL SICARD	ENTERGY/RIVER BEND STATION/PRA
Gary W. Smith	ENERCON/PRA
Guy B. Spikes	ENERCON/Safety Analysis
John McCann	ENTERGY
T.W. GATES	ENTERGY
Sergio Vazquez	Entergy
MARVIN L CHASE	ENTERGY
JOSEPH T. EDOM	JENSEN-HUGHES/PRA+MAINTENANCE RULE

Enclosure 3

NRC PUBLIC MEETING ATTENDANCE REGULATORY CONFERENCE WITH RIVER BEND STATION	
LICENSEE/FACILITY	Entergy Operations, Inc./River Bend Station
DATE/TIME	April 4th, 2016/1:00 PM – 5:00 PM (CDT)
LOCATION	NRC Region IV Office 1600 E. Lamar Blvd. Arlington, TX 76011
NAME (PLEASE PRINT)	ORGANIZATION
Dorothy Andreas	Independent Comm Specialist Contractor
THOMAS R. FARNHOLTZ	U.S. NUCLEAR REGULATORY COMMISSION
EMILY MONTEITH	~~[illegible]~~ NRC

NRC PUBLIC MEETING ATTENDANCE REGULATORY CONFERENCE WITH RIVER BEND STATION	
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NAME (PLEASE PRINT)	**ORGANIZATION**
Steven Carter	Entergy
Donna Jacobs	Entergy
William Maguire	Entergy
Wayne Schmidt	Certrec

NRC PUBLIC MEETING ATTENDANCE REGULATORY CONFERENCE WITH RIVER BEND STATION	
LICENSEE/FACILITY	Entergy Operations, Inc./River Bend Station
DATE/TIME	April 4th, 2016/1:00 PM – 5:00 PM (CDT)
LOCATION	NRC Region IV Office 1600 E. Lamar Blvd. Arlington, TX 76011
NAME (PLEASE PRINT)	**ORGANIZATION**
Bryan Ford	Entergy
Kristi Huffstatler	Entergy
JOEY CLARK	ENTERGY
Kevin Fancher	Entergy