



Entergy

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River Bend Station
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Tel 225-381-4157

William F. Maguire
Site Vice President

RBG-47745

April 3, 2017

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

Subject: Licensee Event Report 50-458 / 2017-001-00
River Bend Station – Unit 1
Docket No. 50-458
License No. NPF-47

RBF1-17-0036

Dear Sir or Madam:

In accordance with 10 CFR 50.73, enclosed is the subject Licensee Event Report. This document contains no commitments. If you have any questions, please contact Mr. Tim Schenk at 225-381-4177.

Sincerely,

WFM / dhw

Enclosure

cc: U. S. Nuclear Regulatory Commission
Region IV
1600 East Lamar Blvd.
Arlington, TX 76011-4511

NRC Sr. Resident Inspector
P. O. Box 1050
St. Francisville, LA 70775

INPO
(via ICES reporting)

IE22
NRR

Licensee Event Report 50-458 / 2017-001-00
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Central Records Clerk
Public Utility Commission of Texas
1701 N. Congress Ave.
Austin, TX 78711-3326

Department of Environmental Quality
Office of Environmental Compliance
Radiological Emergency Planning and Response Section
Ji Young Wiley
P.O. Box 4312
Baton Rouge, LA 70821-4312



LICENSEE EVENT REPORT (LER)

(See Page 2 for required number of digits/characters for each block)

(See NUREG-1022, R.3 for instruction and guidance for completing this form
<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1022/r3/>)

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA, Privacy and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

1. FACILITY NAME

River Bend Station - Unit 1

2. DOCKET NUMBER

05000 458

3. PAGE

1 OF 3

4. TITLE

Operations Prohibited by Technical Specifications (Conduct of Operations With a Potential to Drain the Reactor Vessel With Primary Containment Open)

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
01	31	2017	2017	001	00	04	03	2017	FACILITY NAME	DOCKET NUMBER 05000
									FACILITY NAME	DOCKET NUMBER 05000

9. OPERATING MODE	11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)			
5	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)
	<input type="checkbox"/> 20.2201(d)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(ii)(B)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)
	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)(A)
	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 50.36(c)(1)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(iv)(A)	<input type="checkbox"/> 50.73(a)(2)(x)
10. POWER LEVEL	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(A)	<input type="checkbox"/> 73.71(a)(4)
	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)(B)	<input type="checkbox"/> 73.71(a)(5)
	<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.46(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(v)(C)	<input type="checkbox"/> 73.77(a)(1)
	<input type="checkbox"/> 20.2203(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(D)	<input type="checkbox"/> 73.77(a)(2)(i)
	<input type="checkbox"/> 20.2203(a)(2)(vi)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)(B)	<input type="checkbox"/> 50.73(a)(2)(vii)	<input type="checkbox"/> 73.77(a)(2)(ii)
	<input type="checkbox"/> 50.73(a)(2)(i)(C)	<input type="checkbox"/> OTHER	Specify in Abstract below or in NRC Form 366A	

12. LICENSEE CONTACT FOR THIS LER

LICENSEE CONTACT Tim Schenk, Manager - Regulatory Assurance	TELEPHONE NUMBER (Include Area Code) (225) 381-4177
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13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX
none									

14. SUPPLEMENTAL REPORT EXPECTED <input type="checkbox"/> YES (If yes, complete 15. EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO	15. EXPECTED SUBMISSION DATE	MONTH	DAY	YEAR
		na		

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)

During a refueling outage that commenced on January 28, 2017, there were occasions during which maintenance was performed without taking the required actions to comply with the applicable Technical Specifications. Specifically, operations with a potential to drain the reactor vessel (OPDRVs) were conducted without establishing primary containment integrity, and the provisions of NRC Enforcement Guidance Memorandum (EGM) 11-003, Rev. 3, were invoked instead. The first such operation was commenced on January 31, and the final OPDRV was completed on March 4. This condition is being reported in accordance with 10 CFR 50.73(a)(2)(i)(B) as operations prohibited by Technical Specifications. During all OPDRVs, the prerequisites specified by the EGM were enforced. All activities were completed with no transients in reactor cavity water level having occurred. This event was, thus, of minimal safety significance with regard to the health and safety of the public. On December 20, 2016, NRC approved a generic Technical Specification amendment that can be used by licensees to reconcile this condition. It is required by the EGM that applicable licensees (including River Bend Station) must submit a request for this amendment by December 20, 2017.



**LICENSEE EVENT REPORT (LER)
CONTINUATION SHEET**

(See NUREG-1022, R.3 for instruction and guidance for completing this form
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1. FACILITY NAME River Bend Station - Unit 1	2. DOCKET NUMBER 05000- 458	3. LER NUMBER		
		YEAR 2017	SEQUENTIAL NUMBER 001	REV NO. 00

NARRATIVE

REPORTED CONDITION

During a refueling outage that commenced on January 28, 2017, there were occasions during which maintenance was performed without taking the required actions to comply with the applicable Technical Specifications. Specifically, operations with a potential to drain the reactor vessel (OPDRVs) were conducted without establishing primary containment integrity, and the provisions of NRC Enforcement Guidance Memorandum (EGM) 11-003, Rev. 3, were invoked instead. The first such operation was commenced on January 31, and the final OPDRV was completed on March 4. This condition is being reported in accordance with 10 CFR 50.73(a)(2)(i)(B) as operations prohibited by Technical Specifications.

BACKGROUND

As explained in the EGM, certain safety systems must be operable during OPDRV activities to mitigate draindown events, and to provide protection against untreated fission product release in the event that the reactor pressure vessel (RPV) water level drops and uncovers irradiated fuel. BWR Technical Specifications do not define the term OPDRV or identify specific plant actions that constitute OPDRV activities. Because a definition is not provided, the NRC staff expects the licensee to use the plain language meaning of OPDRV for determining applicable TS requirements. This means that any activity that could potentially result in draining or siphoning the RPV water level below the top of active fuel (TAF), without taking credit for mitigating measures, would be an OPDRV activity. The EGM contains extensive prerequisites for commencements of OPDRVs.

EVENT DESCRIPTION

The OPDRVs conducted in RBS' recent refueling outage included:

1. Flushing certain sections of the reactor coolant piping to reduce radiation dose to workers.
2. Replacement of the "A" reactor recirculation system pump and motor.
3. Replacement of the "B" reactor recirculation pump seal.
4. Reactor control rod drive mechanism replacements.
5. Repair to valves in the control rod drive hydraulic system.

OPDRVs were completed on March 4 with no complications regarding pool water level control.

PREVIOUS OCCURRENCE EVALUATION

On April 18, 2013, RBS submitted Licensee Event Report 050-458 / 2013-001-00 to report a similar occurrence. At the time of that event, Revision 1 of the EGM was in effect and formed the basis upon with RBS conducted OPDRVs during a refueling outage.



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CONTINUATION SHEET**

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		YEAR 2017	SEQUENTIAL NUMBER 001	REV NO. 00

NARRATIVE

CORRECTIVE ACTION TO PREVENT RECURRENCE

On December 20, 2016, NRC approved a generic Technical Specification amendment that can be used by licensees to reconcile this condition. It is required by the EGM that applicable licensees (including River Bend Station) must submit a request for this amendment by December 20, 2017.

SAFETY SIGNIFICANCE

During all OPDRVs, the following prerequisites were enforced:

1. Refueling cavity water level was maintained greater than 23 feet above the reactor pressure vessel flange.
2. The high pressure core spray system was maintained available for inventory makeup
3. The size of the allowable drainage path was minimized to maintain time-to-draindown at greater than 24 hours (to the RPV flange)
4. Two independent means of monitoring reactor cavity water level were maintained.

All activities were completed with no transients in reactor cavity water level having occurred. This event was, thus, of minimal safety significance with regard to the health and safety of the public.