



Entergy Operations, Inc.
River Bend Station
5485 U.S. Highway 61N
St. Francisville, LA 70775
Tel 225-381-3612

Marvin L. Chase
Director – Reg & Performance
Improvement

July 6, 2017

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

RBG-47771
RBF1-17-0080

Subject: Reply to a Notice of Violation 05000458/2017-009-01;
River Bend Station – Unit 1
Docket No. 50-458
License No. NPF-47

Reference: NRC Letter to Entergy, "NRC Problem Identification & Resolution
Inspection Report 05000458/2017009" dated June 9, 2017

Entergy Operations, Inc. (Entergy) is providing a Reply to a Notice of Violation (NOV), pursuant to the provisions of 10 CFR 2.201. The NOV resulted from a Problem Identification & Resolution (PI&R) Inspection conducted April 10 through April 28, 2017. Entergy has reviewed Inspection Report (IR) 2017-009 and prepared a reply which is included in Attachment 1 to this letter.

Commitments in this letter are summarized in Attachment 2.

Should you have any questions regarding this reply, please contact Timothy Schenk at (225) 381-4177.

A handwritten signature in black ink, appearing to read "Marvin L. Chase".

MLC/KRH/alc

Attachments:

- 1) Reply to a Notice of Violation 05000458/2017-009-01: Inspection Report 05000458/2017009
- 2) List of Commitments

cc:

Regional Administrator
U.S. Nuclear Regulatory Commission
Region IV
1600 E. Lamar Blvd.
Arlington, TX 76011-4511

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

Public Utility Commission of Texas
Attn : PUC Filing Clerk
1701 N. Congress Ave.
Austin, TX 78711-3326

Ms. Lisa M. Regner, Project Manager
U.S. Nuclear Regulatory Commission
MS 8-H4
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Attachment 1

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Reply to a Notice of Violation 05000458/2017-009-01:
Inspection Report 05000458/2017009

Attachment 1

Reply to a Notice of Violation 05000458/2017-009-01: Inspection Report 05000458/2017009

Statement of Violation

10 CFR 50.59(c)(2) requires, in part, that a licensee shall obtain a license amendment pursuant to 10 CFR 50.90 prior to implementing a proposed change, test, or experiment if the change, test, or experiment would result in more than a minimal increase in the frequency of occurrence of an accident previously evaluated in the final safety analysis report (as updated).

Contrary to the above, as of April 28, 2017, the licensee failed to obtain a license amendment pursuant to 10 CFR 50.90 prior to implementing a change, test, or experiment that resulted in a more than minimal increase in the frequency of occurrence of an accident previously evaluated in the final safety analysis report (as updated). Specifically, on July 3, 1999, the licensee implemented a design change to the reactor core isolation cooling injection location from the reactor vessel head to a feedwater line, but failed to correctly evaluate that a spurious reactor core isolation cooling actuation into the feedwater line resulted in a more than minimal increase in the frequency of occurrence of the loss of feedwater heating accident previously evaluated in the updated final safety analysis report.

Reasons for the Violation

Entergy agrees that a performance deficiency exists and has performed an Adverse Condition Analysis (ACA). The ACA evaluated the failure of River Bend Station to complete a Licensing Amendment Request (LAR) in a timely manner after receiving a violation in October of 2015. The LAR was for a design change which moved the reactor core isolation cooling injection location from the reactor vessel head to a feedwater line. The ACA determined that there were gaps in the area of procedure use and adherence as well as a lack of knowledge and oversight. The causal factors in the ACA are supported by:

- Failure to follow EN-LI-102, "Corrective Action Process" resulted in a Significance 'B' Condition Report (CR) being closed to a Licensing Action Request (LR-LAR). Significance 'B' CRs are required to be tracked within the CR and not closed to another process (except the Work Order process with PRG approval.)
- Failure to follow EN-LI-102, "Corrective Action Process" resulted in multiple due date extensions. Actions were delayed due to plant outage support tasks and to develop a contract for the work. Resolution was also delayed due to a change in direction (performing a 50.59 versus a License Amendment). This change in direction was not perceived as a change in intent therefore, the change was not re-presented to the Performance Review Group (PRG) per EN-LI-102 for approval.
- Engineering lacked knowledge of the basis for the accident analysis. Knowledge management and successor planning was lacking because RBS analysis staff was reduced to a single individual who subsequently retired. Adequate knowledge transfer did not occur.

Corrective steps that have been taken and the results achieved

An ACA was completed and documents the following completed actions:

- The individuals responsible for oversight of CAP have been coached that CAP actions cannot be closed to LR-LAR actions and on the purpose and importance of including a statement of intent in corrective actions. This is evidenced by, "Immediate Actions; CR/CA Closure Quality Communication", dated June 26, 2017.
- The individuals responsible for CA intent not being included in CA wording (preventing PRG update/ oversight) have been coached on the purpose and importance of including a statement of intent in corrective actions. An interim action is in place for the PI Manager to review all CR closures for quality. In addition, the importance of addressing conditions adverse to quality in a timely manner has been communicated to the RBS Engineering department.
- Since the 2015 violation, RBS Engineering assigned an individual who gained analysis knowledge. This individual will be the main Design Engineering team member for the LAR preparation.

In addition, a timeline for the LAR has been created and approved by the RBS Regulatory Assurance Manager. RBS Design Engineering individuals involved in the preparation of the LAR have concurred with the timeline.

Corrective steps that will be taken

A corrective action will be assigned in CR-RBS-2017-03505 to submit an LAR for M96-0069, RCIC Reroute to FW. The intent of this action is to ensure an LAR is submitted to address NRC Non Cited Violation NCV 05000458/2015007-02 and NRC Notice of Violation NOV 05000458/2017009.

An LAR will be submitted to the NRC no later than January 31, 2018.

Date when full compliance will be achieved

An LAR will be submitted to the NRC no later than January 31, 2018. Full compliance will be at time of LAR approval by the NRC.

Attachment 2

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List of Commitments

List of Commitments

Commitment	Type (Check one)		Scheduled Completion Date (if required)
	One-Time Action	Continuing Compliance	
Submit an LAR for M96-0069, RCIC Reroute to FW	X		1/31/2018