GULF STATES UTILITIES COMPANY

RIVER BEND STATION POST OFFICE BOX 220 ST. FRANCISVILLE, LOUISIANA 70775

AREA CODE 604 635-6094 346-8651

June 1, 1993
RBG- 38583
File Nos. G9.5, G9.25.1.3

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Gentlemen:

River Bend Station - Unit 1
Docket No. 50-458

Please find enclosed Licensee Event Report No. 93-008 for River Bend Station -Unit 1. This report is submitted pursuant to 10CFR50.73.

Sincerely,

J. W. Leavines for

J. E. Booker
Manager - Safety Assessment
and Quality Verification
River Bend Nuclear Group

NS DRP DCH GMD

LAE/JPS/FRC/DCH/GMD/kvm

IE22
1/1

cc: U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

NRC Resident Inspector
P.O. Box 1051
St. Francisville, LA 70775

INPO Records Center
700 Galleria Parkway
Atlanta, GA 30339-5957

Mr. C.R. Oberg
Public Utility Commission of Texas
7800 Shoal Creek Blvd., Suite 400 North
Austin, TX 78757

Department of Environmental Quality
Radiation Protection Division
P.O. Box 82135
Baton Rouge, LA 70884-2135
ATTN: Administrator

NRC FORM 366 (5-92) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104
EXPIRES 5/31/95

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

LICENSEE EVENT REPORT (LER)

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

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
RIVER BEND STATION	05000 458	1 OF 4

TITLE (4) IMPROPERLY PREPARED RELIEF REQUEST FOR IN-SERVICE TESTING PROGRAM RESULTS IN NON-COMPLIANCE WITH MAIN STEAM ISOLATION VALVE TESTING REQUIREMENT

EVENT DATE (5)			LER NUMBER (6)			REPORT NUMBER (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
										05000
04	29	93	93	-- 008 --	00	06	01	93	FACILITY NAME	DOCKET NUMBER 05000

OPERATING MODE (9)	4
POWER LEVEL (10)	0

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)

	20.402(b)		20.405(c)		50.73(a)(2)(iv)		73.71(b)
	20.405(a)(1)(i)		50.36(c)(1)		50.73(a)(2)(v)		73.71(c)
	20.405(a)(1)(ii)		50.36(c)(2)		50.73(a)(2)(vii)		OTHER
	20.405(a)(1)(iii)	X	50.73(a)(2)(i)		50.73(a)(2)(viii)(A)		(Specify in Abstract below and in Text, NRC Form 366A)
	20.405(a)(1)(iv)		50.73(a)(2)(ii)		50.73(a)(2)(viii)(B)		
	20.405(a)(1)(v)		50.73(a)(2)(iii)		50.73(a)(2)(x)		

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER (Include Area Code)
L.A. ENGLAND, DIRECTOR - NUCLEAR LICENSING	(504) 381-4145

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)			EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
	YES (If yes, complete EXPECTED SUBMISSION DATE)	X NO				

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On April 29, 1993, with the plant in Operational Condition 4 (Cold Shutdown), an investigation was initiated due to an apparent conflict between GSU's Safety Evaluation Report (SER) concerning the in-service testing (IST) program for pumps and valves and the River Bend IST Program Plan. Part of the SER, relief request (RR) #40, is worded such that it requires MSIV testing every cold shutdown. This is in conflict with the IST Program Plan. However, since it is part of the SER, it is required pursuant to Technical Specification 4.0.5. During a cold shutdown in December 1992, the MSIV testing requirement was not met. Therefore, GSU has concluded that this event is reportable pursuant to 10CFR50.73(a)(2)(i)(b) as a condition prohibited by the Technical Specifications.

The root cause has been determined to be personnel error when testing frequency changes were processed on relief request #40 including the word "every." Relief request #40 has been revised to address the error and to add the new requirements for additional MSIV exercising. This will prevent recurrence. Until this revision of the relief request is reviewed and approved by the NRC, RBS will perform a fast full stroke exercise test every cold shutdown.

REQUIRED NUMBER OF DIGITS/CHARACTERS
FOR EACH BLOCK

BLOCK NUMBER	NUMBER OF DIGITS/CHARACTERS	TITLE
1	UP TO 46	FACILITY NAME
2	8 TOTAL 3 IN ADDITION TO 05000	DOCKET NUMBER
3	VARIES	PAGE NUMBER
4	UP TO 76	TITLE
5	6 TOTAL 2 PER BLOCK	EVENT DATE
6	7 TOTAL 2 FOR YEAR 3 FOR SEQUENTIAL NUMBER 2 FOR REVISION NUMBER	LER NUMBER
7	6 TOTAL 2 PER BLOCK	REPORT DATE
8	UP TO 18 – FACILITY NAME 8 TOTAL – DOCKET NUMBER 3 IN ADDITION TO 05000	OTHER FACILITIES INVOLVED
9	1	OPERATING MODE
10	3	POWER LEVEL
11	1 CHECK BOX THAT APPLIES	REQUIREMENTS OF 10 CFR
12	UP TO 50 FOR NAME 14 FOR TELEPHONE	LICENSEE CONTACT
13	CAUSE VARIES 2 FOR SYSTEM 4 FOR COMPONENT 4 FOR MANUFACTURER NPRDS VARIES	EACH COMPONENT FAILURE
14	1 CHECK BOX THAT APPLIES	SUPPLEMENTAL REPORT EXPECTED
15	6 TOTAL 2 PER BLOCK	EXPECTED SUBMISSION DATE

REPORTED CONDITION

On April 29, 1993, with the plant in Operational Condition 4 (Cold Shutdown), an investigation was initiated due to an apparent conflict between GSU's Safety Evaluation Report (SER) concerning the in-service testing (IST) program for pumps and valves and the River Bend IST Program Plan. Part of the SER, relief request (RR) #40, is worded such that it requires MSIV (*ISV*) testing every cold shutdown. This is in conflict with the IST Program Plan. However, since it is part of the SER, it is required pursuant to Technical Specification 4.0.5. During a cold shutdown in December 1992, the MSIV (*ISV*) testing requirement was not met. Therefore, GSU has concluded that this event is reportable pursuant to 10CFR50.73(a)(2)(i)(b) as a condition prohibited by the Technical Specifications.

INVESTIGATION

On April 23, 1993, at the request of NRC inspectors, GSU provided information concerning the RBS Safety Evaluation Report (SER) on the IST program for pumps and valves. The NRC expressed particular interest in RR #40, which is the cold shutdown justification for testing the main steam isolation valves (MSIVs). The NRC inspectors raised the following questions:

1. Why was this cold shutdown justification worded differently than the rest of the cold shutdown justifications?

2. Was RR #40, cold shutdown justification, reviewed and approved by the NRC?

Due to the concerns raised by the NRC inspectors a condition report (CR) was initiated on May 29, 1993 to investigate these issues.

GSU began an extensive search into the history of how this relief request was developed. Our investigation into the history of RR #40 revealed that it was originally written for relief from quarterly full stroke testing by requesting that alternate testing be performed during refuel outages. This philosophy was later changed due to industry experience with MSIV testing. In 1987, General Electric issued GE service information letter (SIL) 21 to address MSIV failures due to a loss of air. In 1988, an addendum was issued to this document. In addition, the NRC had issued Inspection and Enforcement (I&E) Notice #85-84 concerning MSIV failures. A

meeting was held at River Bend on December 15 and 16, 1987 between the NRC, their consultants (EG&G Idaho Inc.), and GSU. The meeting was to discuss the questions raised by the review of the IST pump and valve program. The question on the MSIVs was to provide more specific technical justification for not performing full stroke exercising, fail safe testing, and stroke timing these valves on a quarterly basis. As a result of this meeting, it was agreed that a conservative approach would be to revise RR #40 which required full stroke testing every refueling outage. The revision would require the full stroke testing, under certain conditions, during cold shutdowns. The original relief request was worded as follows:

"A full stroke exercise test for each valve during every refuel outage."

When it was revised the words "refuel outage" were removed and "cold shutdown" added, and the word "every" was inadvertently left in place. Subsequently, RR #40 was reviewed and approved by the NRC.

The revision should have incorporated wording identical to the other cold shutdown justifications. The IST Program Plan has specific guidance as what the cold shutdown frequency is, and how cold shutdown testing is to be implemented. The program states that the valves shall be tested during cold shutdowns but not less than every 92 days. Testing shall commence within 48 hours after achieving cold shutdown, but shall not prevent plant start-up. Completion of cold shutdown testing is not a prerequisite for commercial generation of power. Tests not completed prior to startup will be rescheduled for the next cold shutdown starting with the last test performed. Cold shutdown testing is not required if testing was performed in the last 92 days.

ROOT CAUSE

The root cause has been determined to be personnel error when testing frequency changes were processed on relief request #40 leaving in the word "every." This implied that we would perform this testing every cold shutdown contrary to the direction given in our IST Program Plan. Because of this error, the relief request required performance every cold shutdown and caused a failure to comply in December 1992.

A review of previous LERs revealed no similar events.

CORRECTIVE ACTION

Relief request #40 has been revised to address the error and to add the new requirements for additional MSIV exercising. This will prevent recurrence. Until this revision of the relief request is reviewed and approved by the NRC, RBS will perform a fast full stroke exercise test every cold shutdown.

Surveillance test procedure (STP)-109-6302 is being revised to incorporate the new testing prescribed in the RR #40. An additional step in our test schedule will incorporate the requirement for testing the MSIVs every cold shutdown until the new relief request is approved by the NRC.

All other cold shutdown justifications were reviewed. The intent of these justifications was verified to require testing during cold shutdowns.

SAFETY ASSESSMENT

An Engineering review and analysis have shown that the condition indicated would not have placed the plant in a configuration beyond the safety analysis due to the missed performance of MSIV cold shutdown testing. The acceptable monthly performance of STP-051-0201 and previous performance of STP-109-6302 during refueling outage 4 indicate the valves had acceptable performance until February 27, 1993. Recent review of the results of STP-051-0201 performed on that date and MSIV testing during an outage (April - May 1993) revealed that MSIV 1B21*AOVF022B had stuck in the open position. However, based on acceptable monthly performances of STP-051-0201 until February 27, 1992, there is no evidence of prior valve failure.

Note: Energy industry identification codes are indicated in the text as (*XX*).