ENTERGY

Entergy Operations, Inc.
River Bend Station
P.O. Box 220
St. Francisville, LA 70775

January 28, 1994

U. S. Nuclear Regulatory Commission
Mail Station P1-37
Washington, DC. 20555

Attention: Document Control Desk

Subject: River Bend Station - Unit 1
Docket No. 50-458
License No. NPF-47
Request for Early Issuance of License
Amendment Extending Surveillance Intervals
File Nos.: G9.5, G9.42

RBG-39971

Gentlemen:

On January 27, 1994, during a review of previously completed surveillance test records, Entergy Operations, Inc. (EOI) discovered that Technical Specification Surveillance 4.6.1.3.f (flow test of MS-PLCS and PVLCS leakage into containment) will exceed its surveillance interval (18 months plus 25%) on February 2, 1994. This surveillance requirement requires the plant to be in a shutdown condition in order to safely perform the test. A briefing was held with members of your staff at the River Bend Station on January 27, to status the discovered condition and explain our intention to request assistance.

On November 18, 1993, Gulf States Utilities (now Entergy Operations, Inc.) submitted an application for amendment to the River Bend Station Operating License. Included were proposed changes to Technical Specification 4.6.1.3.f which would allow a one time extension of the surveillance interval to support the current fuel cycle outage schedule. The application for amendment requested approval by February 7, 1994, in order to avoid an unnecessary plant shutdown. This application was noticed in the Federal Register to support our requested date.

A001

By this letter, River Bend Station (RBS) is requesting the NRC issue the proposed amendment by February 2, 1994. Granting the proposed amendment earlier than previously requested will allow River Bend to avert an unnecessary plant shutdown for a condition which does not constitute a reduction in the overall protection of the public health and safety.

This request has been reviewed and approved by the RBS Facility Review Committee. The attachment provides the information supporting the request. Your cooperation regarding River Bend's request is greatly appreciated. If you have further questions regarding the attached information, please contact me or my staff.

Sincerely,

James J. Fisicaro
Manager-Safety Assessment
and Quality Verification

JJF/jr
enclosure

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

Mr. Edward T. Baker
U. S. Nuclear Regulatory Commission
M/S OWFN 13-H-15
Washington, DC 20555

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

REQUEST FOR RIVER BEND STATION SURVEILLANCE TEST INTERVAL AMENDMENT EARLY ISSUANCE

DISCUSSION OF THE REQUIREMENTS

- Technical Specification 4.6.1.3.f specifies "Total sealing air leakage into the primary containment, at a test pressure of 11.5 psid for MS-PLCS valves and 33 psid for penetration leakage control system sealed valves, shall be determined by test at least once per 18 months."

- Technical Specification 4.0.3 specifies "Failure to perform a Surveillance Requirement within allowed surveillance interval, defined by Specification 4.0.2, shall constitute non-compliance with the OPERABILITY requirements for a Limiting Condition for Operation."

- Technical Specification 3.6.1.3 ACTION c. specifies "with the measured leakage rate greater than . . . restore the measured leakage rate to . . . prior to increasing reactor coolant system temperature above 200°F."

- Technical Specification 1.33 specifies "PRIMARY CONTAINMENT INTEGRITY - OPERATING shall exist when . . . d. The containment leakage rates are within the limits of Specification 3.6.1.3."

- Technical Specification 3.6.1.1 PRIMARY CONTAINMENT INTEGRITY - OPERATING ACTION specifies "Without PRIMARY CONTAINMENT INTEGRITY - OPERATING, restore PRIMARY CONTAINMENT INTEGRITY - OPERATING within 1 hour or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours."

On January 27, 1994, during a review of previously completed test records, Entergy Operations, Inc. (EOI) discovered that Technical Specification Surveillance 4.6.1.3.f (flow test of MS-PLCS and PVLCS leakage into containment) will exceed its surveillance interval (18 months plus 25%) on February 2, 1994. This surveillance requirement requires the plant to be in a shutdown condition in order to perform the test. Although the issue at hand involves only exceeding the surveillance interval and EOI has no reason to believe that the leakage rates have been or will be exceeded, the appropriate action for exceeding the surveillance interval is to cascade to the Technical Specification 3.6.1.1 ACTION which requires plant shutdown.

CIRCUMSTANCES AND NEED FOR REQUEST

During a review of surveillance test procedures on January 27, 1994, EOI determined the required surveillance interval information was not correct in a completed test status report. This error will result in 4 valve stem leakage paths exceeding their 18 month surveillance interval, including the 25% allowance of specification 4.0.2, on February 2, 1994 at 1200 hours. These valves are part of the main steam leakage control system (MS-PLCS). The purpose of surveillance 4.6.1.3.f is to ensure total leakage into containment from the MS-PLCS is limited to prevent containment pressurization after a design-basis loss of coolant accident (LOCA).

The River Bend Station - Unit 1 (RBS) has been in operating Cycle 5 since September 8, 1992, after completing the fourth refueling outage which began March 12, 1992. During this period, several forced outages have occurred which have impacted the 18-month surveillance intervals required by the TS for MS-PLCS leak rate testing. This results in several surveillance tests performed during the last refueling outage exceeding the surveillance interval plus the allowable extension to the interval specified in TS 4.0.2, prior to the next scheduled outage, where applicable.

On November 18 (RBG-39425), and revised on December 21, 1993 (RBG-39796), RBS submitted an amendment request to extend the surveillance period for Technical Specification SR 4.6.1.3.f. However, RBS believed at that time that February 7, 1994 was the necessary date for approval of the extension. The review now indicates that RBS needs the amendment by February 2, 1994.

Should the proposed changes not be granted by February 2, 1994, RBS will be forced to implement an unplanned outage during this operating cycle. Therefore, EOI is requesting early issuance of the proposed amendment.

COMPENSATORY ACTIONS

EOI proposes no additional actions be taken during the period of this request. EOI has no reason to believe that the leakage paths have degraded since the last test performance. No maintenance has been performed on the outboard MSIVs since their last test which would adversely affect the stem leakage. The justification for extending the surveillance interval as provided in the November 18 application for amendment is applicable for this request.

SAFETY EVALUATION

As cited in Section 6.2.4 of the RBS USAR, the purpose of the Containment Isolation System is to prevent the release of significant amounts of radioactive materials from the fuel and the reactor coolant pressure boundary. The Containment Isolation System, the MS-PLCS, discussed in USAR Section 6.7, prevents the release of fission products, in the event of leakage, through the closed main steam isolation valves (MSIVs) and main steam drain lines after a design-basis loss of coolant accident (LOCA). The system establishes a pressurized volume in the main steam lines by maintaining a pressure of at least 10 percent over the prevailing post LOCA reactor vessel pressure which could otherwise instigate leakage to the environment. Thus, for MS-PLCS sealed valves, only inleakage of nonradioactive air into the containment is possible past the valves, and no post-LOCA containment atmosphere is discharged through the pressurized valves. The valves that are sealed with MS-PLCS are required to be tested at 11.5 psid to determine the sealing air leakage into primary containment. This surveillance requirement (SR) is required to be conducted every 18 months.

As cited in the River Bend Station Safety Evaluation Report, Supplement 2 (NUREG-0989), Section 6.2.1.3, analyses have determined that a constant 425 scfh of leakage from both the MS-PLCS and PVLCS sealed valves into containment is the maximum allowed to ensure a potential repressurization of containment is limited to less than 50 percent of containment design pressure during a 30 day period following Loss of Coolant Accident. However, as stated in NUREG-0989, Supplement 1, the TS 3.6.1.3c limit has been specified as 340 scfh, or 80% of the acceptable inleakage. Additionally, as accepted in USAR Sections 6.7.2.2 and 9.3.6.3.2, if high flow from the MS-PLCS or PVLCS or low pressure at the pressurized boundary in the main steam line or the process line valves for PVLCS is detected, the systems will automatically isolate to prevent repressurization of containment. The as-found and as-left (without repair) leak rate for these 4 valves is 27.58 scfh. In the previous test during refueling outage 3 (RF-3) the valves were tested at 20.91 scfh.

The total Division 1 MS-PLCS and PVLCS leak rate is currently 43.31 scfh of an allowable 340 scfh. The total Division 2 MS-PLCS and PVLCS leak rate is currently 75.15 of an allowable 340 schf.

Based on a) the low leak rates for the valves requiring extension, b) the fact that the major contributors (MSIV seat leakage) are not a part of the extension, c) the inherent 20% margin in the TS allowable leak rate value, and d) the system design which will isolate the MS-PLCS and PVLCS so that inleakage considerations can be maintained, the extension of the surveillance interval is justified.

The November 18, 1993, application for amendment provides further details with regard to the safety impact of the surveillance extension.

SIGNIFICANT HAZARDS EVALUATION

In accordance with the requirements of 10 CFR 50.92, the following discussion is provided in support of the determination that no significant hazards are created or increased by the change requested in the submittal.

1. The proposed change would not significantly increase the probability or consequences of an accident because:

   The proposed request is an extension of the surveillance intervals for the TS SR 4.6.1.3f, MS-PLCS sealed valves leak rate testing. Based on the discussion above which shows there is a limited number of MS-PLCS valves requiring interval extension. The valves requiring extension in their surveillance interval have previously had low as-found and as-left leak rates, there is an inherent 20% margin in the TS allowable leak rate value and the value shown to be acceptable by analysis, and the interval extension requested is a small part of the overall interval allowed by TS (22.5 months).

   Therefore, from the above it is shown that the proposed change will not significantly increase the probability or consequences of an accident.

2. The proposed change would not create the possibility of a new or different kind of accident from any previously evaluated because:

   The proposed request of an extension to the surveillance intervals for the measurement of MS-PLCS valve sealing air inleakage to containment durations are small as compared to the overall interval allowed by TS, the low leak rate values of the valves as measured during the last refueling outage, and the substantial margins available from the last testing compared to the TS allowable values are substantial, the proposed change does not create the possibility of a new or different kind of accident from any accident previously analyzed.

3. The proposed change will not involve a significant reduction in the margin of safety because:

The proposed request of an extension to the surveillance intervals for the measurement of the MS-PLCS sealing air inleakage to containment durations are limited, the low leak rate values of the valves as measured during the last refueling outage, and the margins provided from the last testing compared to the TS allowable values are substantial, the proposed change does not involve a significant reduction in the margin of safety.

ENVIRONMENTAL CONSEQUENCES

EOI has reviewed the proposed enforcement discretion against the criteria of 10CFR51.22 for environmental considerations. The proposed changes do not involve a significant hazards consideration, do not significantly increase the types or quantity of effluent that may be released offsite, and do not significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, EOI concludes that the proposed change meets the criteria given in 10CFR51.22 (c)(9) for a categorical exclusion from the requirement for an Environmental Impact Statement.