UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

JUN 15 1994

Docket: 50-458
License: NPF-47

Entergy Operations, Inc.
ATTN: John R. McGaha, Vice President -
Operations, River Bend Station
P.O. Box 220
St. Francisville, Louisiana 70775

SUBJECT: NRC INSPECTION REPORT 50-458/94-06

Thank you for your letter of June 6, 1994, in response to our letter and Notice of Violation dated May 6, 1994. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,

A. Bill Beach, Director
Division of Reactor Projects

cc:
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MIS System
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Senior Resident Inspector, Cooper
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RIV:DRP/C	C:DRP/C	D:DRP		
DLProulx	PHarrell	ABBeach		
6/13/94	6/13/94	6/15/94		

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RIV:DRP/C	C:DRP/C	D:DRP		
DLProulx	PHarrell	ABBeach		
6/13/94	6/13/94	6/15/94		

ENTERGY

Entergy Operations, Inc.
River Bend Station
PO Box 220
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June 6, 1994

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

Subject: Reply to NRC Notices of Violation IR 94-06
River Bend Station - Unit 1/Docket No. 50-458

File No.: G9.5, G15.4.1

RBG-40630

Gentlemen:

Pursuant 10CFR2.201, please find attached Entergy Operation's response to notices of violation described in NRC Inspection Report (IR) 94-06. The inspection was performed by Messrs. Ward Smith and Chris Skinner during January 30, through March 12, 1994, of activities authorized by NRC Operating License NPF-47 for River Bend Station - Unit 1.

EOI is committed to improving RBS performance and will continue to follow the activities as stated in our long term plan. As discussed at the recent June 2, 1994 meeting with your staff, there are several initiatives underway to improve the quality of procedures at RBS. We discussed both long term and interim measures to upgrade procedures at RBS. The Procedure Upgrade Program (PUP) will include interim actions to provide an immediate focus to certain prioritized site procedures. Within 30 days, we will provide written details of the interim steps. In addition, we will schedule a meeting in the near future to discuss details in our PUP.

Should you have any questions, please contact Mr. O. P. Bulich at (504) 336-6251.

Sincerely,

James J. Fisicaro

James J. Fisicaro
Director - Nuclear Safety

JJF/jr
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ATTACHMENT 1

REPLY TO NOTICE OF VIOLATION IR 458/9406-01

REFERENCE

Notice of Violation - Letter from A. B. Beach to J. R. McGaha dated May 6, 1994.

VIOLATION

Failure to Follow Procedures Controlling Measuring and Test Equipment

Technical Specification 6.8.1 requires, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Appendix A, states, in part, that procedures should be provided to ensure that tools, gauges, instruments, controls, and other measuring and testing devices are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy.

Administrative Procedure ADM-0029, "Control of Measuring and Test Equipment," Revision 11, establishes a program for ensuring that measuring and test equipment is properly controlled and calibrated.

Two examples were identified in which measuring and test equipment had not been handled in accordance with the established controls:

1. Procedure ADM-0029, Section 4.5 states, in part that users of measuring and test equipment shall insure that equipment issued from the Cold Tool Room is not used in the radiologically controlled area (RCA).

   Contrary to the above, on January 30, 1994, a pressure gauge labeled "non-RCA" was found staged for use in the fuel building, which was a radiological controlled area.

2. Procedure ADM-0029, Section 5.6.2 sates, in part, that the Master List, sorted by calibration due date, shall be used to ensure that all measuring and test equipment due for calibration are recalled and removed from use in the field prior to the expiration of the calibration date.

   Contrary to the above, on January 30, 1994, a digital meter was found in the fuel building eight days after its calibration had expired.

ATTACHMENT 1

REASON FOR THE VIOLATION

With reference to violation Example 1 above, in December 1993, a precision aneroid barometer (PAB-001A) was issued "long term" to System Engineering from the "Cold-side" tool room. A non-radioactive control area (non-RCA) sticker was placed on the front side of the gauge. On January 30, 1994, the barometer was found by Operations in the RCA.

The procedure that controls M&TE (ADM-0029) describes daily and long term issue of M&TE where long term issue is any period longer than one day. ADM-0029 states that "M&TE issued from the cold side shall not be used or taken into the RCA." The statement is primarily economically motivated and is designed to prevent the user from arbitrarily using M&TE in the RCA, and avoiding unnecessary contamination of M&TE.

The procedure goes on to specify for daily issue, "The M&TE issue facility attendant will make an 'internal transfer' from cold to hot side as necessary. M&TE that is for use in a contaminated area should be selected from previously contaminated M&TE that is located on the hot side and shall be issued from the hot side." The statements from the procedure require M&TE used in the RCA be issued from the hot side issue facility if it is available; and if not, the M&TE can be selected from the cold side and transferred to the hot side.

At the time of the event, River Bend had available only the one barometer. To this extent, the event was a unique situation (one time occurrence). The procedure did not provide guidance for use of M&TE issued long term from the cold side but required in the RCA. In cases of long-term issue, the procedure offers no guidance for transferring M&TE for use in the RCA.

Labels ("For Non-RCA Use") are simple instructions from the M&TE issue facility and not described in the procedure. The label "For Non-RCA Use" is not shown in the procedure as an authorized tag. Regardless, personnel who were staging the M&TE for an upcoming test were inattentive to detail when they ignored the label instructing them not to use the M&TE in the RCA.

Regarding violation Example 2 above, the digital meter was checked out "long term" when the notice to return it to the issue facility for calibration was issued. However, the notice of calibration due date arrived during a three week period when the responsible individual was absent from the site.

The issue facility attendant is responsible for ensuring that M&TE, when issued, has a current calibration due date and is appropriately labeled. The user is responsible for checking the label to assure the calibration due date is current prior to using the M&TE. The issue facility is responsible for issuing a notice of recall to the appropriate supervisor

on M&TE for which the calibration due date is about to expire. The user of M&TE has the responsibility to return any M&TE assigned to him that has an expired calibration due date.

ADM-0029 Section 5.6.2 states in part ..."The Masterlist, sorted by calibration due date, shall be used to ensure that all M&TE due for calibration is recalled and removed from use in the field prior to the expiration of the calibration date. The M&TE Issue facility shall recall the item by notifying the responsible Supervisor." The procedure says that the M&TE shall be recalled and removed from use in the field, not that it must be recalled and removed from the field, prior to the calibration due date. Since the supervisor was notified during a period when the M&TE user was absent from the site, the supervisor was aware that the user could not use the M&TE until he (the user) returned.

A contributing factor to this event was a lack of personal accountability for the return of the digital meter. At the time the notice was received by the supervisor, the person who had initially checked the equipment out was absent from site. Although the supervisor took the necessary steps to assure the digital meter was not used, he failed to assure the M&TE was removed from its staging area and returned to the issue facility.

CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED

Barometer PAB-001A was "frisked" by radiation protection personnel, determined not to be contaminated and returned to the cold tool room for reissue.

Regarding violation Example 1 above, the responsible individual was required to re-familiarize himself with requirements through required reading on ADM-0029 and was counseled on management expectations for procedure compliance. System Engineering was assigned the responsibility to provide a list of procedural inadequacies that contributed to the root cause of this event to Maintenance (the procedure owner). This was completed May 19, 1994.

For the violation Example 2 above, the supervisor took immediate actions to assure that the instrument was not used. Others under his supervision were notified not to use the digital meter. Within one hour of the M&TE user's return, the instrument was retrieved from its staging location and returned for calibration via the issue facility.

System Engineering was requested to review ADM-0029 and provide recommendations to correct the inadequacies of the procedure. The review was completed and recommendations made to Maintenance on June 1, 1994.

The individuals involved with both M&TE events were counseled for their role in failure to follow procedures.

ATTACHMENT 1

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

A revision to ADM-0029 was drafted by Maintenance and is currently out for review and comment. On the basis of System Engineering's review, the following procedural changes are proposed to ADM-0029, Revision 11:

- For M&TE that is to be used in the RCA, the user should ensure that M&TE issued from the cold tool room is essential to the test.

- The term "Internal transfer" will be clarified for short term and long term issue.

- The M&TE user will have the flexibility to use M&TE issued from the cold side tool room in the RCA portion of the plant. M&TE used in the RCA will be frisked and returned to the "Hot" tool room for de-contamination as needed. Internal transfer will be defined for long term issue.

- The procedure will define the use of labels to specify use of a "Non-RCA" M&TE.

- Several procedure requirements are currently in place to prevent use of M&TE beyond its calibration due date. A procedure change will be made to describe the difference between use and return requirements as it relates to expiration of the calibration due date.

The long term performance improvement plan (LTPIP) includes corrective actions to address the performance issues associated with the adequacy of documented instructions, procedures, and drawings. Plans to clarify and communicate management expectations are included in those corrective actions, and place emphasis on identifying and correcting procedural problems in addition to communicating a need to strictly follow procedures.

In addition to communicating management expectations concerning procedural adequacy and adherence, EOI is implementing a Procedures Upgrade Program to streamline the entire procedure change process along with improvements directed to increase the technical adequacy and usability of procedures. To support these enhancements, procedure guidelines and standards are being developed to simplify procedure content and clarify hierarchy. Procedure owners have also been designated and will be held accountable in ensuring that their procedures meet management expectations.

ATTACHMENT 1

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved on January 31, 1994. Revision 12 to ADM-0029 will be approved and issued by July 15, 1994. Long term corrective actions have been implemented and will continue to address problems associated with the adequacy of RBS site procedures. These are long term plans and will be completed in accordance with the schedules outlined in the LTPIP.

ATTACHMENT 2

REPLY TO NOTICE OF VIOLATION IR 458/9406-02

REFERENCE

Notice of Violation - Letter from A. B. Beach to J. R. McGaha dated May 6, 1994.

VIOLATION

Failure to Meet ASME Code Requirements

Technical Specification 4.0.5 requires, in part, that inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code.

Section XI of the ASME Boiler and Pressure Vessel Code, Article IWP-3230 states, in part, that, if pumps fall within the alert status, the normal testing frequency shall be doubled until the cause of the deviation is determined and the condition corrected. Article IWV-3417 states, in part, that if a power operated valves does not meet the acceptance criteria, the test frequency shall be increased to once each month until corrective action is taken.

Contrary to the above, from February 15, 1993, through January 23, 1994, the licensee removed safety-related Valves 1E12&MOVF064B, 1C11*AOVF180, and 1SWP*AOV51B and safety related Pumps 1SWP*P3D, 1E21*PC002, and 1C41*PC001B from the alert status without first implementing corrective actions or performing an engineering analysis to document the acceptability of the inservice test results.

REASON FOR VIOLATION

System Engineering - Inservice Test (IST) personnel failed to follow procedure when they did not document the corrective action and/or engineering evaluation prior to removing components from an "Alert" status (increased testing frequency) as per ASME XI, Sections IWP-3230 and IWV-3417. Contributing causes included:

1. Engineering procedures ENG-3-011, "River Bend Standard for ASME Section XI Inservice Testing for Pumps" and ENG-3-014, "River Bend Standard for ASME Section XI Inservice Testing for Valves" lacked adequate detail establishing documentation requirements for removing a pump or valve from an "Alert" status.

2. The rescheduling method used by the surveillance test procedure (STP) scheduling group is that the Test Completion/Exception form is completed by the STP performer and submitted to the scheduling group. If the Alert condition was not indicated on the form after each test performance, then the test was (incorrectly) placed back on the normal testing frequency without proper evaluation.

CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND RESULTS ACHIEVED

CR 94-0253 was issued on the identified safety related equipment and the CR was dispositioned to include; 1) performing an engineering analysis on the identified equipment and 2) providing necessary instructions to systems engineering on how and when an analysis is needed to return equipment to normal schedule. The CR evaluations were completed on March 4, 1994 which corrected the deficiencies for the components removed from "Alert" status without proper documentation. No discrepancies that would prevent required operations or impact safety were noted.

Procedure Change Notice (CN 94-0325) has been issued for ADM-0015 requiring System Engineering to provide written concurrence prior to equipment being removed from "Alert" status. Until this concurrence is received, a component in an "Alert" status will remain on an increased testing frequency until a written evaluation has been provided to the STP Coordinator. The change notice was accomplished on February 24, 1994.

Also, PEP-0009, Revision 6, "ASME Section XI Documentation" was revised March 31, 1994, to include the method of documentation for engineering evaluations on components removed from the "Alert" status.

The procedure changes described above will prevent the removal of safety related valves and pumps from the alert status list without first implementing corrective actions or performing an engineering analysis to document the acceptability of the inservice test results. The other three procedures implementing ASME XI requirements were reviewed. No deficiencies were identified. Tabletop instructions were provided to personnel involved.

CORRECTIVE STEPS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

System Engineering procedure PEP-0009, Rev. 6, has a standard form (Attachment 6) to be used to inform the STP Scheduling Group of the need to return the component to its normal testing frequency. Until the STP Scheduling Group receives such a memo, the component will continue to be scheduled at an increased frequency.

ATTACHMENT 2

The long term performance improvement plan (LTPIP) include corrective actions to address the performance issues associated with the adequacy of documented instructions, procedures, and drawings. Plans to clarify and communicate management expectations are included in those corrective actions, and place emphasis on identifying and correcting procedural problems in addition to communicating a need to strictly follow procedures.

In addition, an In-Service Testing (IST) Improvement Plan has been established to upgrade the technical adequacy and functionality of the program's test procedures. The plan will include an EOI self-assessment to review the program from a design basis perspective and implement any needed corrective actions.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Corrective actions have been completed and full compliance with Technical Specification 4.0.5 and Section XI of the ASME Boiler and Pressure Vessel Code, Article IWP has been achieved. Long term corrective actions have been implemented and will continue to address problems associated with the adequacy of RBS site procedures. These are long term plans and will be completed in accordance with the schedules outlined in the LTPIP.