



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064

SEP 5 1995

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 5C 458/95-04

Thank you for your letter of August 15, 1995, in response to our letter and Notice of Violation dated July 18, 1995. 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,

J. E. Dyer, Director  
Division of Reactor Projects

cc:  
Entergy Operations, Inc.  
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Entergy Operations, Inc.  
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Plant Operations  
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Entergy Operations, Inc.

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Entergy Operations, Inc.  
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Entergy Operations, Inc.

-3-

bcc to DMB (IE01)

bcc distrib. by RIV:

L. J. Callan  
 Branch Chief (DRP/D)  
 Project Engineer (DRP/D)  
 MIS System  
 RIV File  
 Senior Resident Inspector (Cooper)

Resident Inspector  
 Leah Tremper (OC/LFDCB, MS: TWFN 9E10)  
 Senior Resident Inspector (Grand Gulf)  
 DRSS-FIPB  
 Branch Chief (DRP/TSS)

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09/5/95	09/5/95	09/5/95					

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Entergy Operations, Inc.

-3-

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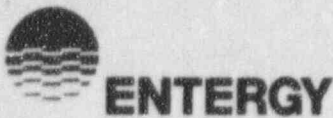
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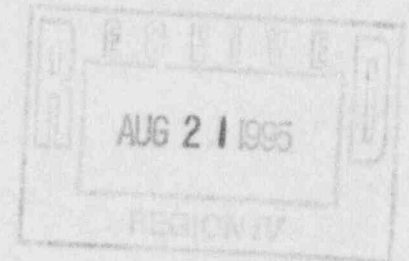


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James J. Fisicaro  
Director  
Nuclear Safety

August 15, 1995

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Mail Stop P1-37  
Washington, D.C. 20555



Subject: Reply to Notice of Violation IR 95-04  
River Bend Station - Unit 1/Docket No. 50-458

File No.: G9.5, G15.4.1

RBF1-95-0189  
RBG-41829

Gentlemen:

Pursuant to 10CFR2.201, please find Entergy Operation's response to the notice of violation described in NRC Inspection Report (IR) 95-04. This inspection was conducted by W.F. Smith between the periods of May 7 through June 17, 1995. The IR cited a violation resulting from an inadequate venting procedure for the Low Pressure Core Spray System.

RBS management realizes the importance of accurate procedures and has repeatedly emphasized the importance of identifying and correcting procedural deficiencies to employees. Management has worked to establish a culture in which working around procedural inadequacies is not acceptable. We believe that these efforts have largely been successful. In this violation, there was a decision made to work around a procedure deficiency based on an incorrect interpretation of administrative guidance. The actions taken as a result of this misinterpretation were carefully evaluated prior to implementation and were documented. Ultimately, these actions did not result in any compromise to plant safety.

As presented at previous RBS /NRC management meetings, RBS has applied significant resources to improve the overall adequacy of site procedures. These initiatives are included in the Long Term Performance Improvement Plan and will continue to focus on improvement in this important area.

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Reply to Notice of Violation IR 95-04

August 15, 1995

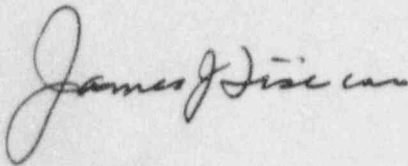
RBF1-95-0189

RBG-41829

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Should you have any questions, please contact Mr. Rick McAdams at (504) 336-6224.

Sincerely,



JJF/RMM/kvm:  
attachment

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## ATTACHMENT

### REPLY TO A NOTICE OF VIOLATION 50-458/9504-01

#### Violation

Technical Specification 6.8.1.a states, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)," Revision 2, February 1978. Regulatory Guide 1.33, Appendix A, paragraph 3.d states, in part, that instructions for filling and venting the emergency core cooling system should be prepared, as appropriate.

Contrary to the above, on May 25, 1995, operators found Procedure SOP-0032, "Low Pressure Core Spray," Revision 10, Section 4.2, inadequate for filling and venting the system. Instead of correcting the procedure, operators filled and vented the system without an approved, adequately maintained procedure.

#### Reason For The Violation

Entergy Operations Inc., concurs with this violation. The root cause was determined to be the incorrect interpretation of administrative guidance contained in ADM 0022, "Conduct of Operations." This misinterpretation occurred when a system operating procedure did not provide guidance for the as-found system condition.

On May 25, 1995, Operations declared the Low Pressure Core Spray (LPCS) system inoperable and removed the discharge line fill pump from service for maintenance. During system restoration, operations attempted to refill the line using procedure SOP-0032, "Low Pressure Core Spray (Sys #205)." However, when SOP-0032, Step 4.2.1.4, was performed to open the high point vent valve to vent the line, air flowed into the system instead of being vented. The procedure did not provide specific guidance for this condition. The vent valve was closed pending evaluation.

An evaluation by Operations and System Engineering concluded that the venting problem was a result of the difference in elevation between the LPCS discharge line high point vent and the suppression pool level. As a result, Operations personnel utilized guidance provided in ADM-0022, Section 6.4.2, which appeared to provide allowances for proceeding with venting without the procedure change. Section 6.4.2 allows, in specific cases where written guidance is not available, equipment operation if documentation of manipulation and verification is provided. Operations documented these manipulations using the Manipulated Device Checklist and the Control Room Logs.

Utilizing ADM-0022 guidance, Operations accurately identified and performed the specific steps and successfully vented the discharge line. The system was then designated ready for service but not returned to operable status due to other clearances.

After investigation, it became apparent that the requirements of ADM-0022, Section 6.4.2, had been misinterpreted. The intent of this section is to allow flexibility in the operation of plant components when written guidance is not available. This section requires a well documented process, such as the Manipulated Device Checklist and the Control Room Logs, for such conditions. However, in this case, a procedure already existed and a procedure change should have been made to incorporate the necessary venting steps.

#### **Corrective Steps That Have Been Taken and The Results Achieved**

Engineering recommended a method for venting the LPCS discharge line for the previously discussed configuration. Subsequently, procedure SOP-0032 was revised to incorporate these additional steps. A review of other ECCS system configurations and their respective venting procedures concluded that no similar problems existed.

A review of ADM-0022 concluded that the procedure was adequate as written. A shift briefing was performed to discuss lessons learned and heighten operator awareness including clarification of the intent of ADM-0022, Section 6.4.2.

#### **Corrective Steps That Will Be Taken To Avoid Further Violations**

No additional corrective actions are required.

#### **Date When Full Compliance Will Be Achieved**

RBS is in full compliance. The investigation of this event concluded that the LPCS system configuration had been accurately controlled during venting and that the venting steps performed were adequate to successfully vent the LPCS system discharge line. There were no additional system manipulations required.