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December 20, 1995

U. S. Nuclear Regulatory Commission  
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Subject: River Bend Station - Unit 1  
Docket No. 50-458  
License No. NPF-47  
River Bend Station's Response to Systematic Assessment of  
Licensee Performance (SALP) Report

Reference: RBC-46199, dated August 21, 1995

File No.: G9.5

RBG-42212  
RBF1-95-0291  
RBEXEC-95-190

Gentlemen:

Your August 21, 1995 letter transmitted the Systematic Assessment of Licensee Performance (SALP) Report for River Bend Station. This report covered the period January 30, 1994 through July 29, 1995. On September 21, 1995, a public meeting was held at the River Bend Station Training Center Auditorium to discuss SALP results with Entergy Operations, Inc. management in a public forum. We have taken this opportunity to respond to the SALP Report and to update you on our continued efforts to improve overall plant performance.

Entergy Operations, Inc. endorses the Nuclear Regulatory Commissions' SALP policy and the use of the SALP process to discuss observations and insights regarding licensees' safety performance. We were encouraged during the public meeting by the Staff's candid delivery of River Bends' plant performance during the SALP period. We agree with your observations, as discussed in the SALP Report and during the public meeting, that the River Bend Station

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performance improved in all four functional areas. Overall improvements are a direct result of development and implementation of our performance improvement plans. These plans focused on improvements in the material condition of the plant, the performance of the people, and work processes used by the people. We have worked hard to establish a self-critical culture. This self-critical attitude has helped us to identify and correct our own problems. Although our Long Term Plan continues to pay dividends, we will continue to improve in all functional areas and will use our self-assessment program to guide those improvements. We will continue to meet routinely with the NRC staff to discuss our progress and other plant initiatives.

We appreciate the Staff's acknowledgment of our efforts in the Plant Support area and will continue with the same degree of effectiveness to further improve in the remaining three functional areas. Although we received superior performance in the plant support area, the SALP report indicated, "Some weaknesses were noted in the Access Authorization Program with limited documentation of background screening files, independent verification of background investigation screening records, and the verification of activities during periods of unemployment." The Access Authorization Program has undergone a recent evaluation of its processes and oversight functions. As a result, enhancements have been made to strengthen the overall effectiveness of the program company wide. We will continue to monitor this program and make additional improvements as necessary.

Relating to the Plant Operations functional area, operator performance improved during the SALP period. In addition, improvements were made in operations processes, and plant material conditions. We have implemented several changes to emphasize personnel accountability. These changes have resulted in an increased sense of ownership by plant operators, which contributed to the longest continuous run at RBS, (which is also the best run this year of any Entergy site). The staff indicated, "Despite these improvements, procedure quality and operator errors still created challenges to plant operations." Efforts to correct procedure quality and operator errors will continue to be emphasized by plant management. The SALP report stated, "The overall quality of procedures improved during the evaluation period, but operators often continued to work around, rather than correct, inadequate procedures." We will continue to improve operator performance during routine activities and focus on correcting procedure work around problems. Continuation of our self-assessment and corrective action initiatives will assist with reductions in these areas.

The Staff also noted, "Corrective action program reviews were thorough but did not always provide a timely review of operability concerns." In our efforts to maintain a conservative approach to operating RBS, we are developing an operability determination procedure that will provide additional guidance for timely review and assessment of operability concerns. This procedure will ensure the performance of operability reviews are commensurate with the safety significance of the system, structure, or component. We have developed an important safety culture at the River Bend Station. Decisions made by operations personnel are conservative and well thought out. Our safety system performance, which is our primary focus, has improved significantly and is steadily approaching high performance comparable to other high performing plants.

Improvements in the Maintenance functional area resulted from implementation of plans to resolve long-standing equipment problems. We experienced fewer problems with less significant adverse impact on plant operations from maintenance activities. This was a result of the questioning attitudes of our maintenance personnel, their sense of ownership and identification of deficiencies through self-assessments and the corrective action process. We are especially pleased the Staff recognizes the improvements we have made in the maintenance area. The SALP report indicated, "... problems were still identified with the technical contents of some work packages, surveillance procedures and drawings." We are continuing to improve usability of procedures, work packages, and other documents routinely used to perform plant activities. Significant improvements will be recognized with the full implementation of the Electronic Maintenance System. This system, which is already partially implemented, will facilitate consistent development of work packages, as well as improving availability of pertinent information for maintenance planners. We have taken a proactive approach to comprehensively identify and correct problems in maintenance. Additional improvements are planned and underway for the preventive maintenance program and in the area of maintenance skills and work practices.

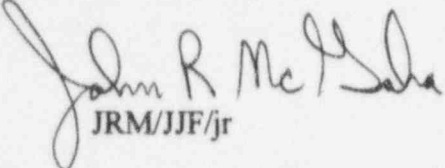
Performance in the Engineering functional area showed remarkable improvement. Our increased management oversight assisted us in identifying initiatives and programs directed toward correcting weaknesses. Engineering has an ongoing plan to regularly assess its organizational structure for improvements and to make changes as necessary. We have benefited greatly from the consolidation of engineering functions. Increased engineering involvement will continue to identify and correct historic and current design problems.

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The SALP report stated, "... design engineering performance was mixed when conducting engineering evaluations...". As indicated above, a new operability evaluation procedure is being developed to provide guidance on performing adequate and timely operability evaluations. This procedure will improve the overall process for operability evaluations. Initiation of comprehensive upgrade programs in configuration management and other engineering processes will continue to be implemented to improve overall effectiveness in the engineering functional area.

In summary, we have made considerable improvements in all areas of the plant. These improvements were a result of organizations working together in a teamwork and Total Quality environment with emphasis on accountability. We will continue to support decision-making for all plant personnel. This culture has been instilled into each individual at River Bend and, for the most part, has driven the improvements we observe today. We appreciate this opportunity to comment on our progress and our plans for future initiatives. If you have any questions regarding the information provided, please contact us.

Sincerely,

  
JRM/JJF/jr

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