ENTERGY

Entergy Operations, Inc.
River Bend Station
5485 U.S. Highway 61
P.O. Box 220
St. Francisville, LA 70775
Tel 504 336 6225
Fax 504 635 5068

James J. Fisicaro
Director
Nuclear Safety

February 1, 1996

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

Subject: Reply to Notice of Violation 50-458/9525-01 & 03
River Bend Station - Unit 1 / Docket No. 50-458/95-25
File Nos. G9.5, G15.4.1

RBG-42414
RBF1-96-0036

Gentlemen:

Pursuant to 10CFR2.201, attached please find Entergy Operation's response to the notice of violation described in NRC Inspection Report (IR) 95-25. This Inspection Report cited two separate violations. The first violation involved incorrect application of 10CFR50, Appendix 'A', GDC 55 to two instrument lines for positive control of containment integrity. The second violation involved a missed technical specification surveillance.

Entergy Operations agrees with these violations. We share your concern and recognize the importance of positive control of containment integrity and adequacy of corrective actions in the licensee event reports. We have, therefore, taken immediate corrective measures and have planned additional long term measures to address these important issues. The response to the first violation (458/9525-01) is attached.

The response to the second violation (458/9525-03) is documented in the Licensee Event Report (LER) 50-458/95-009-00 dated December 1, 1995. River Bend Station management places a high emphasis on the adequacy of root causes and corrective actions for significant conditions including LERs. Special root cause expertise is provided for investigating significant conditions and the Corrective Action Review Board (CARB), consisting of managers and directors, reviews these investigations for adequacy. As a result of this effort, substantial improvements have been observed in the corrective action program. This is evident through both EOI and NRC reviews of the program.

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The In-House Event Analysis (IHEA) group at River Bend Station, which consists of highly trained root cause analysis personnel, plans to review a representative sample of River Bend Station LERs from January 1, 1994, through December, 1995, to assure adequacy of the root causes and corrective actions. Based on this review, necessary action will be taken.

If you have any questions, please call David Lorfing at (504) 381-4157.

Sincerely,

J. W. Leavines for
J. J. Fisicaro

JJF/SVD/kvm
attachment

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

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

INPO Records Center
700 Galleria Parkway
Atlanta, GA 30339-3064

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

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

ATTACHMENT

REPLY TO A NOTICE OF VIOLATION 458/9525-01

Violation

10CFR Part 50, Appendix A, General Design Criterion 55 states, in part, that each line that is part of the reactor coolant pressure boundary and that penetrates primary reactor containment shall be provided with one automatic isolation valve inside and one locked closed isolation valve outside of containment unless it can be demonstrated that the containment isolation provisions for a specific class of lines are acceptable on some other defined basis.

Contrary to the above, as of October 30, 1995, a primary containment penetration included a line that did not meet containment isolation provisions in that the low pressure core spray instrument line did not contain one locked closed isolation valve outside of containment and no other demonstrated provisions were identified as acceptable.

Reason For The Violation

Entergy Operations Inc., concurs with this violation. The instrument lines associated with the aforementioned Low Pressure Core Spray (LPCS) pressure transmitter and with a similar instrument line associated with the Residual Heat Removal (RHR) Loop C pressure transmitter were not identified as part of the containment isolation boundary during the original River Bend licensing process, or during a subsequent review of valve locking requirements in 1986. Investigation of the violation concluded that 10CFR50, Appendix A, General Design Criteria 55 was incorrectly applied in these cases. One of the factors contributing to the incorrect interpretation was the unusual instrument line configuration which is not specifically addressed in the regulatory guidance for instrument line containment isolation or Emergency Core Cooling System (ECCS) influent line isolation. Another factor was that manual valves, similar to those used as the isolation boundary for leakage monitoring connections, were present on the instrument root connection.

There was no adverse impact on the plant operation or safety as the instrument valves were in their correct closed position prior to adding the locking devices.

Corrective Steps That Have Been Taken and The Results Achieved

Condition Report 95-1145 was initiated to document the described condition and implement corrective actions. The appropriate valves for the LPCS and the RHR Loop C pressure transmitters were sealed closed. A detailed review of the piping and instrumentation diagrams showing the containment penetrations listed in Updated Safety Analysis Report Table 6.2-40 was completed. There were no additional instances of lines in the containment isolation boundary without a defined, accepted isolation basis.

Corrective Steps That Will Be Taken To Avoid Further Violations

The Updated Safety Analysis Report will be revised to identify the LPCS and RHR pressure transmitter vent and drain valves as part of the containment isolation boundary and to include their defined basis for compliance with 10CFR50, Appendix A, GDC 55. Piping and instrumentation diagrams and applicable procedures will be revised to identify these valves as locked closed. Additional guidance will be included in the engineering procedure for determining valve locking requirements.

Date When Full Compliance Will Be Achieved

The current configuration of the LPCS and RHR Loop C pressure transmitter lines are in compliance with 10CFR50, Appendix A, GDC 55 requirements. Full compliance will be achieved by March 31, 1996, when the license change document to revise the Updated Safety Analysis Report documenting the defined basis for the instrument line valve locking requirements will be completed.