



ENTERGY

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April 22, 1996

U.S. Nuclear Regulatory Commission
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Subject: Reply to Notices of Violation 50-458/9602-02,03, and 04
River Bend Station - Unit I
License No. NPF-47
Docket No. 50-458

File Nos.: G9.5, G15.4.1

RBG-42805
RBF1-96-0131

Gentlemen:

Pursuant 10 CFR 2.201, attached is the River Bend Station (RBS) reply to notices of violation described in Inspection Report No. 50-458/96-02. By letter dated March 21, 1996, the Staff indicated that our reply to the violations may reference or include previous docketed correspondence if the correspondence adequately addresses the required response. RBS submitted (in the below referenced Licensee Event Reports) corrective actions taken in response to the second and third violations identified in the aforementioned Inspection Report.

The first violation concerns operators' failure to perform independent verification of safety-related systems upon return to operating status, as required by plant procedures. Immediate actions were initiated by operations to document and review conditions surrounding this violation. To address the generic implications identified in the Inspection Report, the operations department will form a task force comprised of operations personnel to investigate procedural non-compliance issues previously identified by the corrective action program. Our detailed response to this violation is provided in the attachment to this document.

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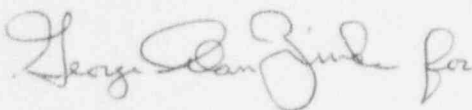
The second violation concerns failure to establish all provisions of containment integrity for shutdown conditions as described in the bases for the Technical Specifications. On February 20, 1996, RBS submitted voluntary LER 96-006-00, which documents our investigation and corrective measures to prevent future occurrences. The root cause of this event was determined to be failure to adequately consider operating practices and licensing basis during the development and issuance of the basis for Specification 3.6.1.10. Immediate corrective actions were taken at the time until the issue could be resolved. (Reference: RBF1-96-0028, dated February 21, 1996)

The third violation concerns plant personnel's failure to fully implement a license condition to tag all hoses and cables passing through the containment airlock with expeditious removal instructions. RBS submitted LER 96-005-00 to document this event and its corrective actions. The root causes and corrective actions are described in our letter dated February 15, 1996. (Reference: RBF1-96-0027, dated February 15, 1996).

Entergy Operations, Inc. agrees with the Staff's categorization of these concerns and recognizes the importance of implementing programs to control Technical Specification requirements, as well as programs that will effectively control independent verification of control room activities. We feel that the immediate actions taken, in concert with the planned long-term measures, adequately address these important issues.

Should you have any questions regarding the attached information, or information contained in the referenced docketed correspondence, please contact Mr. David Lorring of my staff at (504) 381-4157.

Sincerely,



JJF/JS/kvm
attachment

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cc: U.S. Nuclear Regulatory Commission
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Mr. David L. Wigginton
U.S. Nuclear Regulatory Commission
M/S OWFN 13-H-2
Washington, DC 20555

ATTACHMENT

REPLY TO NOTICE OF VIOLATION

50-458/9602-02

Notice Of Violation

Technical Specification 5.4.1 a states, in part, that written procedures shall be implemented, covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operations)," Revision 2, February 1978.

Appendix A of Regulatory Guide 1.33, recommends a procedure for authorities and responsibilities for safe operation and shutdown. Administrative procedure ADM-022, "Conduct of Operations, Revision 18A, implements this requirement.

Paragraph 6.3.7 of procedure ADM-022, states, in part, that control board lineups shall be performed after completion of any operation or component manipulations on safety-related, Technical Specification systems. Control board lineups performed in this manner shall be verified by a different operator and documented in the control room logbook.

Contrary to the above, on January 26, January 29, and February 3, 1996, operators performed manipulations on the containment venting system, fuel pool cooling system, and residual heat removal system, respectively, but did not independently verify the restoration.

Reason For The Violation

Entergy Operations, Inc., agrees with this violation. The reason for this violation is the failure of operations personnel to comply with procedures established to administratively control verification of certain control room activities. ADM-0022, states, in part, that, "Control Board line-ups shall be performed after completion of any operation or component manipulations ... on safety-related, Technical Specification Systems... Control Board line-ups performed in this manner shall be verified by a different person and documented in the control room logbook."

During the specific incident involving the containment venting system, a logbook entry was made as required by procedure. The responsible operator was properly notified that a second verification would be required for the affected equipment; however, with several control room evolutions taking place, including shift turnover, the operator mentally prioritized the task to be performed prior to the end of his shift but forgot to do so. An actual time limit is not associated with the second verification or documentation of activities. It had become standard practice to complete these activities during the time which the system manipulations occurred.

It is also feasible to surmise that the second verification required for the fuel pool cooling and residual heat removal systems was not performed due to similar circumstances. In addition to the above, other contributing factors included poor work practices by the unit operator and the oncoming shift. The unit operator failed to perform an adequate review of the logs for completeness before concluding his shift. The oncoming shift is also required, by procedure, to perform a review of these logs as part of the shift briefing and turnover process, but failed to inquire about the incomplete log entries.

The second verification requirement delineated by ADM-0022 would have been met if the administrative controls stipulated by procedures for verification, review, and turnover activities had been properly followed.

Corrective Steps That have Been Taken and The Results Achieved

The following steps have been taken in response to this violation.

1. Condition Report No. 96-0366 was initiated to document the condition identified. A subsequent review of control room logs was conducted to determine if additional control room log-keeping discrepancies existed. Corrective actions were taken, as appropriate, to address issues identified.
2. Operations management reiterated to control room operators the importance of maintaining configuration control on required operable equipment. Operators were also reminded of appropriate techniques for tracking ongoing control room activities.
3. Shift briefings were conducted with operating crews to stress the importance of conducting a complete review of shift logs, including verification of completeness of all log entries.

Corrective Steps That Will Be Taken To Avoid Further Violations

A task force will be formed to investigate the underlying cause(s) of non-compliance with administrative procedures in the area of operations. This group will be comprised of personnel from various levels of operations, i.e., unit and ATC operators, shift supervisors/superintendents, work control group, etc. The overall purpose of the task force is to identify and resolve any perceived conflicts between management expectations, commitments, and procedures. The group will also focus on ways to strengthen individual accountability, and resolve ambiguous or misunderstood requirements. Entergy Operations, Inc. believes that a group composed of personnel directly involved with the issues will facilitate more effective and viable solutions.

The operations department is currently in the process of benchmarking control room logbook practices at other nuclear plants. Any improvements identified as a result of this process will be evaluated for incorporation into applicable procedures, as appropriate.

Date When Full compliance Will Be Achieved

Full compliance has been achieved. Any additional findings or actions identified by the task force will be resolved by August 1, 1996.