

## ENCLOSURE 1

### NOTICE OF VIOLATION

Entergy Operations, Inc.  
River Bend Station

Docket No.: 50-458  
License No.: NPF-47

During an NRC inspection conducted from November 3 through December 14, 1996, three violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. Technical Specification (TS) 5.4.1.a states, in part, that written procedures shall be maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operations)," Revision 2, February 1978. Item 4 of Appendix A to Regulatory Guide 1.33 recommends procedures for the operation of safety-related systems.

Contrary to the above, listed below are examples where Procedure SOP-0040, "Hydrogen Mixing, Purge, Recombiners, and Igniters," Revision 9, was not properly maintained:

1. Each of the four igniter panels had a master breaker that was not identified on the Procedure SOP-0040 breaker lineup. Failure to verify these breakers closed could have resulted in groups of 5 igniter circuits being unable to perform their intended safety function.
2. Procedure SOP-0040, Attachment 3C, "Electrical Lineup for the Hydrogen Recombiners," conflicted with the control board lineup Attachment 4C "Control Board Lineup - Hydrogen Recombiners," in that Attachment 3C required the breakers to be open while Attachment 4C required the breakers to be closed.
3. Procedure SOP-0040, Attachment 1, "Valve Lineup for Hydrogen Purge," failed to specify the required status for Valves CPP-V3, -V4, and -V5. Valve CPP-V3 was specified open in lieu of locked open, Valve CPP-V4 was specified locked/capped instead of locked closed and capped, and Valve CPP-V5 was specified capped in lieu of closed and capped.

This is a Severity Level IV violation (Supplement I) (50-458/9616-01).

- B. TS 3.0.6 specifies, in part, that when a supported system limiting condition for operation (LCO) is not solely met due to a support system LCO not being met, the conditions and required actions associated with this supported system are not required to be entered. Only the support system LCO actions are required to be entered. In this event, additional evaluations and limitations may be required in accordance with TS 5.5.10, "Safety Function Determination Program."

TS 5.5.10 states, in part, "...a loss of safety function may exist when a support system is inoperable, and: a. A required system redundant to system(s) supported by the inoperable support system is also inoperable..."

TS 3.5.1.H requires, in part, that with both high pressure core spray (HPCS) and low pressure core spray (LPCS) inoperable enter LCO 3.0.3 immediately.

Procedure OSP-0040, "LCO Tracking and Safety Function Determination Program," Revision 1, Step 3.4.1 specifies that a cross-divisional check must be performed to ensure that no loss of safety function goes undetected and Step 4.2.5, specified that if TS 3.0.6 is entered to prevent entering additional LCOs for supported systems, perform an evaluation as required by TS 5.5.10 to ensure no loss of safety function exists. Further, Procedure OSP-0040, Enclosure 1, "Support-Supported LCO Matrix," indicated upon entry into support LCO TS 3.7.1 (SSW), a review of supported LCO 3.5.1 (ECCS-Operating) was required.

Contrary to the above, on November 14, 1996, operators removed the Division I standby service water system (a support system for LPCS) from service while the HPCS system was already inoperable because of a disabled room cooler without performing a loss of safety function determination as required by TS 5.5.10 and Procedure OSP-0040.

This is a Severity Level IV violation (Supplement I) (50-458/9616-02).

- C. 10 CFR 50.55a(f) specifies the regulatory requirements to maintain an inservice test program for safety-related components.

Updated Final Safety Analysis Report, Section 9.1.3 specifies that the design basis of the spent fuel pool cooling system includes the ability of a single division to remove the required spent fuel pool heat load during accidents and specifies that the spent fuel pool cooling pumps will be tested in accordance with ASME Code Section XI. ASME Code Section XI, Subsection IWP-3230(c), "Corrective Action," specifies that correction shall be either replacement or repair per IWP-3111, or shall be an analysis to demonstrate that the condition does not impair pump operability and that the pump will still fulfill its function. A new set of reference values shall be established after such analysis.

Contrary to the above, on December 14, 1996, inservice test personnel failed to establish a new set of reference values as required by ASME Code Section XI, Subsection IWP-3230 prior to placing the Train A spent fuel pool cooling pump in service to maintain pool temperatures, with Train B out of service periodically from August 18 to November 11.

This is a Severity Level IV violation (Supplement I) (50-458/9616-03).

Pursuant to the provisions of 10 CFR 2.201, Entergy Operations, Inc. is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Arlington, Texas  
this 7th day of January 1997