

APPENDIX A

NOTICE OF VIOLATION

Entergy Operations, Inc.
River Bend Station

Docket: 50-458
License: NPF-47

During an NRC inspection conducted on June 5 through July 16, 1994, three violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. Technical Specification 6.8.1 states, in part, that written procedures shall be maintained covering surveillance and test activities of safety-related equipment and the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Appendix A, states, in part, that maintenance that can affect the performance of safety-related equipment should be properly performed in accordance with written procedures appropriate to the circumstances.

Contrary to the above, two examples are listed below where adequate procedures were not maintained:

1. A procedure was not maintained in that Maintenance Work Order E568208 did not include a step for the installation of a jumper to prevent the interruption of a power supply neutral circuit during the replacement of Agastat Relay 1B21H*K163, which would have precluded an engineered safety feature actuation.
2. A procedure was not maintained in that Surveillance Test Procedure STP-200-0602, "Division II Remote Shutdown System Control Circuit Operability Test," Revision 7, did not provide instructions to prevent an engineered safety feature actuation when isolating the reactor plant component cooling water system.

This is a Severity Level IV violation (458/9415-01) (Supplement I).

- B. Technical Specification 3.3.1.b, Table 3.3.1-1, Action 9, requires, in part, that the reactor mode switch be locked in the "Shutdown" position within 1 hour of the time that less than the minimum operable channels per trip system are operable.

Contrary to the above, on June 10, 1994, the reactor mode switch was out of the "Shutdown" position for approximately 4 hours, during a period when both divisions of the manual scram functional unit were not operable.

This is a Severity Level IV violation (458/9415-02) (Supplement I).

- C. Technical Specification 6.11 states, in part, that procedures for personnel radiation protection shall be prepared consistent with the

requirements of 10 CFR Part 20 and shall be adhered to for all operations involving personnel radiation exposure.

Section 6.1.2 of Radiation Section Procedure RSP-0213, "Control and Handling of Radioactive Materials," Revision 7, requires material left inside a posted contamination area to be tagged or labeled when the dose rate from the material equals or exceeds 100 millirem per hour, deep dose equivalent, on contact.

Contrary to the above, on June 2, 1994, a bag without a tag or label was left in a contaminated area and the dose rate of the bag was 1000 millirem per hour on contact.

This is a Severity Level IV violation (458/9415-03) (Supplement IV).

- D. Technical Specification 6.8.1 requires, in part, that written procedures shall be implemented covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Appendix A, recommends general procedures for the control of maintenance, repair, replacement, and modification work on safety-related equipment.

Step 6.7 of General Maintenance Procedure GMP-0042, "Circuit Testing and Lifted Leads and Jumpers," Revision 7B, states, in part, that independent verification of restoration shall be performed on all lifted leads. Step 8.4.9 states, in part, that the independent verifier shall remove each lifted lead/jumper tag upon completion of each individual verification and sign and date the "Verified Restored" block of the lifted lead and jumper tag sheet.

Contrary to the above, on June 29, 1994, licensee personnel implementing Maintenance Work Order C306902 for the replacement of Relay K-1 on the lower containment airlock failed to perform independent verification of the lifted leads during the restoration of the new relay. The performer, in lieu of the independent verifier, removed the lifted lead/jumper tag upon restoring the connections.

This is a Severity Level IV violation (458/9415-04) (Supplement I).

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. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued to show cause 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.

Dated at Arlington, Texas
this *8th* day of *August* 1994