

LICENSEE EVENT REPORT (LER)

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|--|---|-----------------------------|
| FACILITY NAME (1)<br><b>RIVER BEND STATION</b> | DOCKET NUMBER (2)<br><b>0 5 0 0 0 4 5 8 1</b> | PAGE (3)<br><b>1 OF 0 6</b> |
|--|---|-----------------------------|

TITLE (4) **Technical Specification Surveillance Requirement Not Met Due To Secondary Containment Doors And Hatch Omitted From Surveillance Test Procedure**

| EVENT DATE (5) |     |      | LER NUMBER (6) |                   |                 | REPORT DATE (7) |     |      | OTHER FACILITIES INVOLVED (8) |  |                   |
|----------------|-----|------|----------------|-------------------|-----------------|-----------------|-----|------|-------------------------------|--|-------------------|
| MONTH          | DAY | YEAR | YEAR           | SEQUENTIAL NUMBER | REVISION NUMBER | MONTH           | DAY | YEAR | FACILITY NAMES                |  | DOCKET NUMBER (S) |
| 03             | 25  | 88   | 88             | 010               | 00              | 04              | 25  | 88   |                               |  | 0 5 0 0 0         |

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| OPERATING MODE (9)<br><b>1</b>           | THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5. (Check one or more of the following) (11) |  |   |  |  |  |  |  |  |  |
| POWER LEVEL (10)<br><b>100</b>           | <input type="checkbox"/> 20.402(b)   | <input type="checkbox"/> 70.405(c)                 | <input type="checkbox"/> 50.73(a)(2)(iv)      | <input type="checkbox"/> 73.71(b)                            |  |  |  |  |  |  |
|  | <input type="checkbox"/> 20.405(a)(1)(i)   | <input type="checkbox"/> 50.36(c)(1)               | <input type="checkbox"/> 50.73(a)(2)(v)       | <input type="checkbox"/> 73.71(c)                            |  |  |  |  |  |  |
|  | <input type="checkbox"/> 20.405(a)(1)(ii)  | <input type="checkbox"/> 50.36(c)(2)               | <input type="checkbox"/> 50.73(a)(2)(vi)      | OTHER (Specify in Abstract Below and in Text, NRC Form 388A) |  |  |  |  |  |  |
|  | <input type="checkbox"/> 20.405(a)(1)(iii)   | <input checked="" type="checkbox"/> 50.73(a)(2)(i) | <input type="checkbox"/> 50.73(a)(2)(viii)(A) |  |  |  |  |  |  |  |
|  | <input type="checkbox"/> 20.405(a)(1)(iv)  | <input type="checkbox"/> 50.73(a)(2)(ii)           | <input type="checkbox"/> 50.73(a)(2)(viii)(B) |  |  |  |  |  |  |  |
| <input type="checkbox"/> 20.405(a)(1)(v) | <input type="checkbox"/> 50.73(a)(2)(iii)  | <input type="checkbox"/> 50.73(a)(2)(ix)           |   |  |  |  |  |  |  |  |

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|---|--|--------------------------|-----------------|
| LICENSEE CONTACT FOR THIS LER (12)                        |  | TELEPHONE NUMBER         |                 |
| NAME<br><b>L. A. England - Director-Nuclear Licensing</b> |  | AREA CODE<br><b>5104</b> | <b>381-4145</b> |

| COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13) |        |           |              |                     |       |        |           |              |                     |  |
|--|--------|-----------|--------------|---------------------|-------|--------|-----------|--------------|---------------------|--|
| CAUSE  | SYSTEM | COMPONENT | MANUFACTURER | REPORTABLE TO NPDOS | CAUSE | SYSTEM | COMPONENT | MANUFACTURER | REPORTABLE TO NPDOS |  |
|  |        |           |              |                     |       |        |           |              |                     |  |
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|--|--|--|--|-------|-----|------|
| SUPPLEMENTAL REPORT EXPECTED (14)  |  |  | EXPECTED SUBMISSION DATE (15)          | MONTH | DAY | YEAR |
| <input type="checkbox"/> YES (if yes, complete EXPECTED SUBMISSION DATE) |  |  | <input checked="" type="checkbox"/> NO |       |     |      |

ABSTRACT (Limit to 1400 spaces, i.e. approximately fifteen single space typewritten lines) (16)

At approximately 1300 hours on 3/25/88, with the unit in operational condition 1 (power operation - 100 percent power) it was discovered that the Surveillance Requirement for Technical Specification 3.6.5 "Secondary Containment" had not been properly performed for all required doors and equipment hatch covers due to a procedural omission. The cause of the omission from the procedure is considered to be a result of insufficient procedural guidance and inadequate administrative controls during procedure development and turnover from subcontractors.

As corrective action, the applicable Surveillance Test Procedures (STPs) were revised, and a procedure history sampling review is being performed on other operations STPs. Because other instrumentation, and effective administrative controls and tracking systems were available, it has been concluded that it is unlikely that secondary containment integrity was violated at any time when it was required. Therefore, there was no significant impact on the health and safety of the public as a result of this event.

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TEXT (if more space is required, use additional NRC Form 366A's) (17)

Reported Condition

At approximately 1300 hours on 3/25/88, with the unit in operational condition 1 (power operation - 100 percent power), it was discovered during the first biennial procedure review of Surveillance Test Procedure (STP)-000-0201 "Monthly Operating Logs" that the surveillance requirement for River Bend Station (RBS) Technical Specification 4.6.5.1(b) "Secondary Containment" had not been properly performed during the periods from 10/31/85 through 1/26/86 and from 7/31/87 through 3/25/88. Surveillance Requirement 4.6.5.1, Item b.2, requires that, at least once per 31 days, the door (\*DR\*) in each access to the secondary containment be closed (except during normal entry and exit). Contrary to this requirement, four doors were not listed in STP-000-0201. Failure to adequately perform this surveillance requirement constituted a condition prohibited by the RBS Technical Specification 3.6.5.1 which requires that secondary containment integrity shall be maintained in operational conditions 1, 2, and 3 or restored within 4 hours, or be in at least hot shutdown within the next 12 hours and in cold shutdown within the following 24 hours.

Investigation

A revision history review was conducted for STP-000-0201. The fuel building ventilation intake plenum access hatch was identified as never being included in the procedure as required by Technical Specification 4.6.5.2, Item b. The root cause for this deficiency is considered to be inadequate procedure review during initial STP preparation. However, the secondary containment doors were added in a revision, deleted in a subsequent revision, then subsequently rediscovered as being deleted on 3/25/88. The root cause for this deficiency has been determined to be inadequate initial procedure review and lack of procedural control for turnover activities of subcontractors.

On 1/26/86, TCN 86-0138 was issued against revision 7 of STP-000-0201 to correct the secondary containment door list. The following doors were not included: FB 95-01, FB 70-01, FB 70-04, and FB 70-05. Two other doors, FB 171-01 and AB 171-08 were incorrectly identified in the STP as FB-170-01 and AB 171-09, respectively. These are considered to be typographical errors because sufficient information was available to determine that the appropriate access doors for these areas were properly positioned. Therefore, RBS was in potential noncompliance with the requirements of Technical Specification 3.6.5, at times when Secondary Containment-Operating was required (Modes 1, 2 and 3), from 10/31/85 until the TCN was issued on 1/26/86. Further investigation revealed that this condition was not previously reported when initially detected.

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TEXT (if more space is required, use additional NRC Form 388A 2) (17)

Revision 8 of STP-000-0201 was issued on 3/17/86 and included the items listed in TCN 86-0138 and corrected the error of FB 171-01. This revision was completed by an on-site contractor who had responsibility for STP preparation under an approved Quality Assurance Program. However, when revision 8 was approved, the contractor was transferring data and procedure control responsibilities to Gulf States Utilities (GSU). Data transfers were via magnetic diskettes and were given to GSU for subsequent revisions during the project turnover period. There was not a formal administrative or section procedure established to define the turnover process. When the revision 9 markup for "STP-000-0201" was drafted in April of 1987, GSU had full responsibility for procedure control.

The markup for revision 9 included TCN incorporations only. Because this was a minor revision, only the markups were proofread to ensure correct input. However, investigation revealed that the markups were input to the computer diskette version of revision 7 instead of the approved version (revision 8). A check of the diskette menu showed that GSU possessed the diskette version of revision 7 only. Versions of STP-000-0201 for subsequent GSU tasked revisions (9 and 10) are contained in the main computer memory. All subsequent revisions to this procedure did not contain the items originally incorporated by revision 8, which included the updated secondary containment door list added by TCN 86-0138. Therefore, a second period of noncompliance existed from 7/31/87, when revision 9 was approved, until 3/25/88, when the condition was discovered.

In order to determine the status of the doors and hatch during the periods of non-surveillance, an evaluation was conducted. This evaluation was based upon reviews of existing administrative tracking systems, other STPs related to Technical Specification 3.6.5, and non-safety related surveillance activities.

The subject access hatch is rectangular steel plate (approximately 2 by 4 feet) bolted to the side of the fuel building ventilation intake plenum, located at elevation 148 feet in the fuel building (\*ND\*). A Maintenance Work Order (MWO) is required to perform work and control maintenance activities. A computerized maintenance history search for the fuel building ventilation system (mark number: HVF) was conducted and showed that no work activity to remove the access hatch was performed on the intake plenum or inlet ventilation components since October of 1985. Additionally, STP-406-0604, "Fuel Building Ventilation Exhaust Radiation Functional and Drawdown Test," is performed to satisfy Technical Specification 4.6.5.1.c.2. The drawdown time limit data was compared from the time STP-406-0604 was baselined (9/24/85), to the first subsequent performance, (3/31/87) and showed no deficient trends.

The secondary containment doors not surveilled by the STP are vital island doors (with alarm (\*ALM\*) capability) and are verified to be

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TEXT (if more space is required, use additional NRC Form 306A's) (17)

closed by security officers once per shift. Any abnormalities would have been promptly reported to the Operations Shift Supervisor. However, because these security records are not required to be retained for the length of time specified by Technical Specification 6.10.2, "Record Retention", the information is not retrievable for verification purposes.

A Limiting Condition for Operation (LCO) tracking system is controlled by operations per Administrative Procedure (ADM)-0022, "Conduct of Operations". A search and review of the computerized history database against the Technical Specification for secondary containment integrity indicates that 26 LCOs were written against secondary containment doors from the time of initial criticality. Of these, 7 LCOs were against the doors not included in STP-000-0201.

In the unlikely event a door was not closed, or not alarmed when left in the open position, sufficient area checks are made by operations personnel which would detect a potential violation of secondary containment integrity. Based on current operating procedures, operators make rounds on each fuel and auxiliary building (\*NF\*) elevation at least twice each twelve hour shift. They are specifically required to check the associated building differential pressure indicators (\*PDI\*) every twelve hours per Operating Section Procedure (OSP)-0012, "Daily Log Report," to ensure the building is slightly negative. Additionally, a low differential pressure alarm is available to the control room operator to initiate response to locked-in high pressure conditions for the secondary containment buildings. These alarms have historically been sensitive when doors are authorized to be held open for equipment entry/removal.

A review of previously submitted LERs from River Bend Station for similar events revealed in LER 87-026 an instance of two fire doors being not included in STP-000-3001, "Daily Fire Door Position Check", as required by Technical Specifications. The root cause of this omission appeared to be an isolated case of oversight during procedural revision at the time of an annual review. The corrective action for this omission of fire doors from the STP included reviewing fire door STPs against appropriate design documents and would not have detected the errors reported in this LER.

Corrective Action

A detailed building walkdown was conducted to identify all required doors and hatches. It was determined that a fuel building access hatch, located at the normal fuel building ventilation (\*BH\*) intake plenum, was also not identified in the procedure. Therefore, a Temporary Change Notice (TCN) was immediately issued to the procedure to incorporate the missing doors, hatch and correct the editorial errors of AB 171-08 and FB 171-01. The STP was subsequently satisfactorily performed by approximately 1530 on the same day it was

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discovered deficient (3/25/88). The doors and hatch were all found to be in their proper positions.

Subsequent to March of 1986, these doors were identified during required procedural reviews. GSU believes that the implementation of the current OSP-005, "Operations Procedure Review and Revision," checklist for preparation and review by operations personnel would identify similar procedural deficiencies. Additionally, a memorandum will be issued to all operations personnel emphasizing the importance of following OSP-005 for procedure preparation and review.

Further corrective action has been taken to add all changes made in revision 8 of STP-000-0201 to the current revision. The procedure which fulfills Technical Specification 4.6.5.2 (STP-000-0103), "Secondary Containment Integrity Fuel Building," has also been revised to incorporate the fuel building components.

A sampling method will be selected to conduct procedure history reviews of operations and maintenance STPs and is intended to address the lack of administrative control during the procedure turnover period. This will determine if the revision problem was generic, which would warrant further review and corrective action. This review will be completed by 6/1/88.

Operations will issue required reading to its licensed personnel regarding the importance of reportability recognition as a result of not reporting this event when it was identified initially on 3/17/86. Required reading will be completed 6/1/88.

The procedure coordination group has identified procedures that were revised during the time in which the contractor was transferring magnetic diskettes to GSU. These procedures will be reviewed to ensure all information has been included in subsequent revisions. This review will be completed by 6/1/88.

Safety Assessment

The results of the evaluation has concluded that based on the review of other STPs intended to satisfy Technical Specification 3.6.5 and the maintenance work history of the fuel building ventilation system, that it is unlikely the ventilation plenum access hatch was ever removed since initial criticality.

Acceptable controls were established to frequently monitor and control the status of secondary containment buildings and doors. Alarms for the secondary containment pressure monitors and building doors have been available and effective in annunciating abnormal conditions. Plant personnel's awareness of and attention to the subject doors has been demonstrated. Therefore, it is unlikely that the doors and hatch were ever mis-positioned or inadequately controlled when secondary

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TEXT (If more space is required, use additional NRC Form 366A's) (17)

containment integrity was required. As a result, there was no significant impact on the health and safety of the public due to this event.

NOTE: Energy Industry Identification System Codes are identified in the text as (\*XX\*).



**GULF STATES UTILITIES COMPANY**

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AREA CODE 504 635-6094 345-8651

April 25, 1988  
RBG- 27725  
File Nos. G9.5, G9.25.1.3

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, D.C. 20555

Gentlemen:

River Bend Station - Unit 1  
Docket No. 50-458

Please find enclosed Licensee Event Report No. 88-010 for River Bend Station - Unit 1. This report is being submitted pursuant to 10CFR50.73.

Sincerely,

J. E. Booker  
Manager-River Bend Oversight  
River Bend Nuclear Group

*JMB*  
JEB/TFP/AOF/DRD/~~DGR~~/RRS/ch

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