



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064

FEB - 4 1998

John R. McGaha, Vice President - Operations  
River Bend Station  
Entergy Operations, Inc.  
P.O. Box 220  
St. Francisville, Louisiana 70775

SUBJECT: NRC INSPECTION REPORT 50-458/97-017

Dear Mr. McGaha:

Thank you for your letter of January 23, 1998, in response to our letter and Notice of Violation dated December 24, 1997. We have reviewed your reply and find it responsive to the concerns about a failure to meet a Technical Specification Limiting Condition for Operation associated with one of the primary containment air locks raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

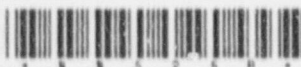
Sincerely,

Elmo E. Collins, Chief  
Project Branch C  
Division of Reactor Projects

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

cc:  
Executive Vice President and  
Chief Operating Officer  
Entergy Operations, Inc.  
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Jackson, Mississippi 39286-1995

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G PDR



Entergy Operations, Inc.

-2-

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-3-

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FEB - 4 1998

**bcc to DCD (IE01)**

bcc distrib. by RIV:

Regional Administrator

DRP Director

Branch Chief (DRP/C)

Project Engineer (DRP/C)

Branch Chief (DRP/TSS)

Senior Resident Inspector (Grand Gulf)

DRS-PSB

MIS System

RIV File

Resident Inspector

DOCUMENT NAME: R:\\_RB\RB717AK.GDR

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FEB - 4 1998

bcc to DCD (IE01)

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Regional Administrator

DRP Director

Branch Chief (DRP/C)

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2/4/98	2/5/98								

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Entergy

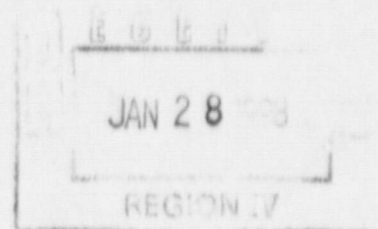
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Rick J. King  
Director  
Nuclear Safety & Regulatory Affairs

January 23, 1998

U.S. Nuclear Regulatory Commission  
Document Control Desk, OP1-17  
Washington, DC 20555

Subject: Reply to Notice of Violation in IR 97-017  
River Bend Station - Unit I  
License No. NPF-47  
Docket No. 50-458



File Nos.: G9.5, G15.4.1

RBG-44354  
RBF1-98-0007

Gentlemen:

Pursuant to the provisions of 10CFR2.201, Attachment A provides the Entergy Operations, Inc. response to the Notice of Violation (NOV) described in NRC Inspection Report (IR) 50-458/97-017.

The subject violation, 50-458/97017-04, involves a failure to meet a Technical Specification Limiting Condition for Operation Action associated with one of the primary containment airlocks.

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

Sincerely,

RJK/MGM  
attachment

98-0695

9801290070 5AP.



Reply to Notice of Violation in 50-458/97-017  
January 23, 1998  
RBG-44354  
RBF1-98-0007  
Page 2 of 2

cc: U.S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 400  
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NRC Sr. Resident Inspector  
P.O. Box 1050  
St. Francisville, LA 70775

David Wigginton  
NRR Project Manager  
U.S. Nuclear Regulatory Commission  
M/S OWFN 13-H-3  
Washington, DC 20555

**ATTACHMENT A**  
**REPLY TO NOTICE OF VIOLATION 50-458/97017-04**  
Page 1 of 3

**Violation:**

During an NRC inspection conducted on October 12 through November 29, 1997, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

Technical Specification Surveillance Requirement 3.0.1 states, in part, "failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO."

Technical Specification Surveillance Requirement 3.6.1.2.1 states, in part, "Perform required primary containment air lock leakage rate testing in accordance with the Primary Containment Leakage Rate Testing Program."

Technical Specification 3.6.1.2, Condition A, applies to containment air locks with one door inoperable. Technical Specification 3.6.1.2, Condition B, applies to containment air locks with the primary containment air lock interlock mechanism inoperable.

Technical Specification 3.6.1.2, Condition C, requires, in part, with one or more primary containment air locks inoperable for reasons other than Technical Specification 3.6.1.2, Conditions A or B, immediately initiate action to evaluate primary containment overall leakage rate per Technical Specification 3.6.1.1, using current air lock test results.

Contrary to the above, on October 30, 1997, at 8 a.m., the lower primary containment air lock failed during the performance of Technical Specification Surveillance Requirement 3.6.1.2.1, thus rendering the air lock inoperable for reasons other than Technical Specification 3.6.1.2, Conditions A or B, and action to evaluate primary containment overall leakage rate per Technical Specification 3.6.1.1, using current air lock test results, was not completed.

This is a Severity Level IV violation (Supplement 1) (50-458/97017-04)



**ATTACHMENT A**  
**REPLY TO NOTICE OF VIOLATION 50-458/97017-04**  
Page 2 of 3

**Reasons for the Violation:**

The primary cause of this violation was related to human performance, in that a complex knowledge based decision was required, but was made using inappropriate assumptions. The Operations Shift Superintendent (OSS), who was responsible for evaluating the condition, made an incorrect assumption regarding the applicable Technical Specifications. The OSS used the Technical Specification Bases discussion for SR 3.6.1.2.1 which discusses a method for quantifying the maximum leakage through the air lock. This method states that the actual air lock leakage (from inside containment to outside containment) is the lesser of the two barriers (air lock doors). The OSS assumed that the only leakage paths, through the air lock doors, were through the door seals or the equalization valves. There was no indication of a seal problem, since the seals were acceptable at the time of the surveillance performance. The OSS had been informed that the equalization valves on the outer door of the air lock were leaking. Focusing on the valve leakage, he neglected other possible paths for leakage, such as tubing, fittings, etc. It should be noted that the inner door equalization valves tested satisfactorily.

A contributing cause was related to work practices, regarding not obtaining one or more peer checks while making complex knowledge based decisions. The OSS discussed the Technical Specification determination with several other Senior Reactor Operators, and other Operations management personnel, but he did so in an informative manner rather than as a consultation for a peer check. The OSS may have inadvertently impressed his own conclusions upon those individuals, instead of allowing them to independently review and advise him.

**Corrective Actions That Have Been Taken:**

At 1330 on October 30, 1997, Technical Specification 3.6.1.2 Condition "C" Actions were entered. The OSS contacted the system engineer to verify that action was being taken to evaluate primary containment overall leakage in accordance with Required Action C.1. Upon repair of the leaking equalization valves, Technical Specification SR 3.6.1.2.1 was completed on the air lock satisfactorily. Technical Specification Limiting Condition for Operation 3.6.1.2 was met and Condition "C" Actions were exited at 0745 on October 31, 1997.

The OSS involved in this event has been counseled by management. This event was addressed, including a more thorough review of applicable Technical Specifications and ensuring that a proper peer check is conducted.

**ATTACHMENT A**  
**REPLY TO NOTICE OF VIOLATION 50-458/97017-04**  
Page 3 of 3

**Corrective Actions That Will Be Taken to Avoid Further Violations:**

Distribution of this event in a shift briefing will be performed to inform other Operations personnel of the need to ensure: thoroughness in the review of applicable Technical Specifications; proper peer checking methods are utilized; and that decisions can be substantiated through appropriate documentation.

Additionally, a discussion of this event, focusing on implementation of Technical Specification actions upon failing surveillances, will be included in the next Licensed operator requalification training module.

**Date When Full Compliance Will Be Achieved:**

River Bend Station is currently in full compliance.