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April 17, 1998

U. S. Nuclear Regulatory Commission
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Subject: River Bend Station - Unit 1
Docket No. 50-458
License No. NPF-47
Commitment Evaluation Summary Report

File No.: G1.47

RBG-44472
RBF1-98-0095

Gentlemen:

Entergy Operations, Inc. (EOI) herein submits a periodic summary of changes to regulatory commitments. The commitment management guidance contained in Revision 2 of the Nuclear Energy Institute "Guideline for Managing NRC Commitments", was utilized in the preparation of this summary report. This report is submitted in conjunction with the required periodic update to the River Bend Station Updated Safety Analysis Report pursuant 10CFR50.71(e)(4).

Should you have any questions, please advise Mr. W. J. Beck at (504) 381-4206.

Sincerely,

DN Loring

For RJK
RJK/WJB/WJF

Attachment

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1. **COMMITMENT** (2916)

Section 4.1.3.1 of the River Bend Station [RBS] Environmental Report - Operating License Stage [ER-OLS] identifies the ruins of a nineteenth century sugar mill which exist on the River Bend property. The discussion in Section 2.5.3.1 of the ER-OLS notes that GSU [Gulf States Utilities] has no plans to develop the site on which it is located and will preserve it [ruins of a nineteenth century sugar mill] by limiting intrusion of the public.

REVISION/JUSTIFICATION

All RBS property is posted for trespassing; therefore, intrusion by the public is legally limited. This commitment to specifically limit intrusion to the ruins of the sugar mill is unnecessary. The intent of this commitment, to limit intrusion by the public to sugar mill ruins, is adequately accomplished by RBS property being legally posted. Continuing compliance with this commitment is no longer appropriate.

2. **COMMITMENT** (5067)

In the response to violation identified in NRC Inspection Report (IR) 85-75, concerning inadequate key control, per [outgoing letter #] RBG-23126, dated 2/5/86, GSU stated: Control of security keys between operations personnel has been added to the Shift Turnover Log.

REVISION/JUSTIFICATION

RBS programs have evolved substantially in the 12 years since this violation on inadequate security key control was received. Authorized Operations personnel are now issued specified key rings by Security personnel. Accountability and documentation are maintained through the security computer system or security key issue log. Security links the keyring to the operator's keycard in the security computer and stores keyrings containing security keys in the Access Control Station when not assigned to an individual. Security keys are generally not allowed to leave the Protected Area. Linking the keyring to the person's keycard in the security computer provides assurance that the individual will not leave the Protected Area until the keyring has been turned in. This process provides a much higher degree of control over security keys than noting key turnover in the shift turnover log. Continuing to carry the above commitment in an active status provides no value and is discontinued.

3. **COMMITMENT** (5068)

In response to NRC IR 85-75, "Inadequate Key Control": Operations personnel observed during the inspection were determined to lack adequate understanding of "positive control" in this application. Additionally, administrative errors were determined to have identified a key

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which did not exist and to have misplaced a key on an incorrect hook within the controlled storage area. GSU stated (in RBG-23126, dated 2/5/86): Security personnel will inventory security keys once per month.

REVISION/JUSTIFICATION

The requirement for security key control is adequately covered by 10CFR73 and implemented by the Security Program, therefore the monthly security key inventory commitment is being eliminated. Also reference the justification for commitment 5067 [Item #2].

4. **COMMITMENT** (5069)

In the response to violation contained in IR 85-75, per RBG-23126, dated 2/5/86, GSU stated: "Security personnel will inspect the use and control of security keys by operations personnel once per month."

REVISION/JUSTIFICATION

The RBS process for controlling security keys has changed since this commitment was made. Security now issues keyrings containing security keys to Operators each shift. When the keyrings are not issued, Security maintains control of them in a locked cabinet inside the Access Control Station. Evolution of the RBS key control program has made this commitment obsolete and it is deleted. Also reference the justification for commitment 5067 [Item #2].

5. **COMMITMENT** (5220)

In RBG-23508, dated 4/11/86, providing GSU's response to NRC IR 86-04 concerning Violation 8604-01, "Failure to Administratively Control Temporary Circuit Alterations" and 8604-02, "Failure to Schedule a Supplemental Audit/Surveillance", Gulf States Utilities (GSU) stated: The requirements of (procedure) GMP-0042 were revised to include the use of a serialized tagging system for providing accountability for jumpers and lifted leads.

REVISION/JUSTIFICATION

The intent of this commitment, to maintain accountability of manipulated equipment during restoration, is better accomplished using permanent plant labels. A greater potential for error may exist when permanent plant labels are not used. The use of a serialized tagging system for lifted and jumpered leads has ended. See the justification for commitment 8460 [Item #25] and the justification for commitment 6303 [Item #14]. Though GMP-0042 is still in use, this commitment no longer adds value and is deleted.

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6. **COMMITMENT** (5231)

In RBG-23535, dated 4/16/86, second response to NRC IR 85-77, Violation 8577-01, "Failure of Design Control Program", GSU stated: A parallel review of Field Change Notices (FCNs) during implementation is conducted by Quality Assurance (QA) to ensure compliance to the procedure.

REVISION/JUSTIFICATION

RBS processes have evolved substantially since this commitment was made in April of 1986. For many years, RBS QA performed a 'line' type of review of design change packages and signed off upon completion. However, as RBS processes evolved and matured, any necessity that may have existed for this commitment went away. RBS programs now focus on doing the right thing right the first time and not on catching/correcting errors through direct oversight (by QA).

7. **COMMITMENT** (5234)

In LER 86-023, per RBG-23558, dated 4/18/86, concerning "Division II Diesel Generator Fuel Oil Valve Misalignment" and failure of surveillance test, GSU stated: In addition to the immediate corrective action taken to restore operability to the Division II diesel generator, corrective actions taken or planned include: Operating procedure OSP-0012 "Daily Log Report" has been changed via Temporary Change Notice (TCN) 86-0512 and TCN 86-0530 to verify proper fuel oil strainer valve alignment for diesel generators A, B and C during each shift.

REVISION/JUSTIFICATION

Operability of the emergency diesel generators (EDGs) is demonstrated on a 31-day frequency via the surveillance program. Implementation of this commitment was overly responsive to the condition it was intended to correct and did not directly address the root cause of the issue identified in LER 86-023. Continuing compliance with this commitment is no longer appropriate.

8. **COMMITMENT** (5333)

Per RBG-23905, dated 6/20/86, response to IR 86-14, GSU stated: A new Operations Section Procedure, OSP-0013, "CTMT/ECCS/Diesel Generator Valves Verification", has been written to provide a weekly review and independent verification of DG subsystems, major emergency core cooling system flow paths, and primary containment isolation for proper valve alignment.

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REVISION/JUSTIFICATION

The operability of emergency core cooling system (ECCS) is demonstrated on a 31 day frequency by piping fill and valve verification surveillance test procedures (STPs) to satisfy Tech. Spec. requirements. All valves are verified (or are locked in place) in associated STPs and Operations Logs at the proper Tech. Spec. intervals. The intent of this commitment is captured in the Surveillance Program and the frequency specified in Technical Specifications is appropriate. This commitment does not specifically address root cause of the incident, i.e. failure to restore a Technical Specifications component to the position required to maintain system operability. Therefore, it does not ensure prevention of recurrence of the condition and should be eliminated.

9. **COMMITMENT** (5353)

RBG-23931, dated 6/26/86, revised a report describing a loss of physical security effectiveness at RBS. The loss of effectiveness concerned a vital island door which was opened by a security officer, who then left the door in flagrant disregard of established security procedures. Central Alarm Station (CAS) operators were directed to conduct status checks of compensatory officers positioned at zones and portals in constant or frequent alarm every five minutes until such time as a position is established with written instructions.

REVISION/JUSTIFICATION

RBS procedures require Security positions to have written instructions. RBS processes have evolved since 1986. Re-evaluation of this commitment has determined that five minute status checks are burdensome and no longer add value. This commitment is no longer necessary and is deleted.

10. **COMMITMENT** (5575)

In RBG-24486, dated 9/26/86, transmitting LER 86-046, concerning "Missed Tech Spec Action On Fuel Building Radiation Monitor," GSU stated: When wide range gas monitor's [WRGM's] are declared inoperable, auxiliary sampling devices will be placed on, or upstream of, the WRGM, not on the particulate and gas (P&G) monitor. Chemistry Operating Procedure (COP-0046) has been revised to incorporate auxiliary sampling and to document the location of sampling equipment.

REVISION/JUSTIFICATION

When the WRGM's are declared inoperable, stack samples are obtained from the respective Particulate and Gaseous monitor (P&G) for that release point. This prevents having to utilize an auxiliary sample pump to obtain the sample and prevents a loss of isokinetic

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sampling for that sample. It also results in utilizing the monitoring system as it was designed. In the remote event that both the WRGM and the P&G monitor are inoperable then an auxiliary sample pump is employed to obtain the sample. However, this commitment proceduralizing the use and location of auxiliary sampling equipment is no longer required and is deleted.

11. COMMITMENT (5774)

In response to IR 86-31, notice-of-violation (NOV) 8631-01 via RBG-25295, dated 2/2/87 GSU stated: Alertness while on post will be stressed during security officer training.

REVISION/JUSTIFICATION

The security officer training and management functions have evolved since 1987. Security management now uses management tools to address inattentiveness and alertness issues. This commitment to stress alertness during security officer training no longer adds value and is deleted.

12. COMMITMENT (5923)

In RBG-25501, dated 3/17/87, to M. D. McDaniel, private citizen, (with a copy to the NRC) providing GSU's response to Mr. McDaniel's concern on the inadvertent activation of the RBS Prompt Notification System, GSU stated: In response to your concern that the daily auto-interrogation test be conducted during working hours, the time will be changed to 7:30 a.m. to allow for more efficient communication should there be future inadvertent activations.

REVISION/JUSTIFICATION

During 1986 and 1987 the computer software was modified to install an auto-cancel routine which, if any change of status at a siren location is detected, the computer shuts down the siren, preventing it from sounding. This program change has been in effect for the past six-years with no further inadvertent sounding related to the auto-interrogate routine. In addition, the computer program actually auto-interrogates the sirens every 200 minutes, 24 hours a day, rather than once daily as in the past.

13. COMMITMENT (5935)

In RBG-25561, dated 3/26/87, response to NRC IR 87-02 and violation 8702-01, "Inadequate Procedures for Control of Radioactivity" contained there, GSU stated: Security has revised SPI-4 "Security Position Instruction" as follows: 1) If an Officer is on duty in the exit areas and the portal monitor alarms when an individual exits, the individual will be stopped,

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instructed to reset the portal monitor and pass through again. If the monitor alarms a second time, Radiation Protection will be contacted to perform a contamination survey. 2) If an Officer is not on duty in the exit area and the portal monitor alarms, the Access Control Officer will lock the turnstile and the same procedure in paragraph one will be followed.

REVISION/JUSTIFICATION

The Protected Area physical arrangement and exit process have changed. The requirement for a Security officer to be present at the exit turnstiles no longer exists. Therefore, the Security officer response to portal alarms, per this commitment, should be eliminated.

14. COMMITMENT (6303)

In (site correspondence letter) SCRB-11655 documenting GSU's committed corrective actions related to the 12/14/87 enforcement conference with the NRC (IR 87-28), concerning "Tech Spec violation due to incorrectly positioned instrument root valve", GSU stated, "Each cycle, 100% of all safety related systems lineups are performed." This commitment is also reflected exactly as stated above in the NRC enforcement conference summary letter, attachment to RBC-36690, dated January 29, 1988.

However, in RBG-27648, dated 4/4/88, providing GSU's response to violation 8728-01 "Failure to maintain required high drywell pressure instruments operable", under corrective steps which will be taken to avoid further violations, GSU revised this commitment action by stating: "All safety related systems lineups will be performed every refueling outage".

REVISION/JUSTIFICATION

This commitment is overly burdensome since other and more appropriate controls are in place that more effectively control safety related and other equipment position. Procedure OSP-0014, Admin Control of Equipment and Devices, establishes a program for administratively controlling plant equipment where personnel or equipment safety is not an issue. Procedure ADM-0027, Safety Tagging, ensures that the status of safety-related and other important equipment is appropriately verified when the equipment is restored to service. The commitment is revised such that each cycle, 100% of all safety related system lineups will be performed.

15. COMMITMENT (6962)

In RBG-28881, dated 9/26/88, transmitting Licensee Event Report (LER) 88-018 concerning "Reactor Scram Due to Main Generator Exciter Brush Failure," GSU stated: The under voltage relays which led to the failure to transfer of switchgear 1NNS-SWG1A have been replaced. The current preventive maintenance tasks for cleaning the undervoltage relay

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contacts are scheduled on a 24-month frequency per the vendor's recommendations. Maintenance is presently revising these tasks to require a 6-month frequency. The required revisions to the preventive maintenance tasks are currently scheduled to be completed by 10/31/88.

REVISION/JUSTIFICATION

The undervoltage relays which led to the failure to transfer switchgear 1NNS-SWG1A have been replaced. The increased testing frequency did not identify undervoltage relay problems that would justify a continued 6 month testing frequency. Also, the current plant configuration does not require the operation of these relays. 1NNS-SWG1A/B bus transfer is not required due to the normal lineup being from the Reserve Station Service Transformers.

16. COMMITMENT (7446)

In RBG-26902 transmitting Safeguards Event Report (SLER) 88-S05 and in RBG-30359 transmitting SLER 89-S03, GSU stated: Prior to the event, the six compensatory positions on the Protected Area barrier were rotated every two hours and communication checks were conducted every 30 minutes (nominal). As a result of this incident, the positions shall now be rotated every hour and a communications check conducted every 15 minutes (nominal).

REVISION/JUSTIFICATION

Many aspects of the Security program as well as Security program management have changed since the time frame of this event. Security evaluated this commitment and concluded that it is burdensome, an unnecessary use of resources, and a return to previous time frames for communications checks and rotations is appropriate. The commitment is therefore deleted.

17. COMMITMENT (7642/7643)

In RBG-29868, dated 1/6/89 transmitting an Information Report concerning "the Addition of the Wrong Lubricating Oil to the Division III HPCS Diesel Generator," and in RBG-29740 transmitting GSU's response to NRC IR 88-23 concerning "Failure to Follow Maintenance Work Order Procedures," and specifically in response to Violation 8823-01, GSU stated: The standing work order concept for unscheduled lubrication for Q-Applicable (quality applicable) equipment is no longer in use. GSU now requires a specific maintenance work order (MWO) for that lubrication which requires planning, routing through Quality Control (QC) for establishment of any hold/witness points, a release-for-work signature prior to the job and return-to-service signature upon completion. (7642)

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In RBG-29740, dated 1/6/89 transmitting GSU's response to NRC IR 88-23 concerning "Failure to Follow Maintenance Work Order Procedures," and specifically in response to Violation 8823-01, GSU stated: Also being investigated is the use of a specific preventive maintenance (PM) task for unscheduled lubrication. This concept may be used but the use of a specific work document for a specific scope of work with routing through Operations and quality assurance (QA) as noted above will be maintained. The intent of having a work document and job plan will be maintained whether a MWO or a PM is used. (7643)

REVISION/JUSTIFICATION

Revise (eliminate) commitment 7642 and 7643. Justification notes that the use of a specific MWO to control the addition of oil to the diesel generator (DG) or to any Q-applicable equipment is inappropriate and unnecessary since sufficient controls are in place to ensure the proper lubricant is identified and the proper piece of equipment selected for work. (Lubrication manuals are controlled documents and specify the type of lubricant to be used. Specific logs are maintained as a record of oil additions. A second verification is required to ensure the proper lubrication is selected for Q-applicable equipment.) The intent of this commitment is captured in the Maintenance Program and is a more effective way to minimize recurrence. The NOV response did not address the root cause, i.e., failure to read and follow written instructions, and therefore does not prevent recurrence of the condition and should be eliminated. This commitment was also noted to be burdensome and overly responsive with little or no safety benefit.

18. COMMITMENT (7775)

In RBG-30532, dated 4/14/89 transmitting SLER 89-S05 concerning "Security Events", GSU stated: All current and future alarm station operators will be instructed on computer transfer/startup/restart operations at both CAS (central alarm station) and SAS (secondary alarm station) on a periodic basis and within 1 week of initial assignment to alarm station operator duty.

REVISION/JUSTIFICATION

Since completing installation of the new Security Computer in 1996, computer transfer/startup/restart functions are no longer necessary. This commitment is therefore obsolete and is deleted.

19. COMMITMENT (6015)

In RBG-25975, dated 5/19/87, transmitting voluntary report regarding Reactor Thermal Power exceeding 100%, RBS stated: Procedure EDP-CC-0001, "Software/Database Change Control," has been implemented which requires Operations notification prior to

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implementing program changes. An independent signoff has been included to ensure that on-shift Operations personnel are cognizant of changes made to computer systems that could impact plant operation. Procedure EDP-CC-0001 also includes the Operations department in the review cycle for proposed software or database changes.

REVISION/JUSTIFICATION

Since 1987, the RBS program for controlling changes to computer software has evolved substantially. Revision 0 to RBNP-041, entitled "Computer Software Evaluation Procedure" was issued on March 5, 1987. EDP-CC-0001 is entitled "Non-Safety Related Computer System Change Control" and is now an Informational procedure only. RBNP-041 is now at Revision 6 and has been retitled "Computer Software Management". RBNP-041 controls changes to software which is considered either Critical or Essential. A portion of the description of Critical software is that it "has a direct, active affect on the operation of a nuclear safety system, structure or component." Software classified as Essential includes several categories of non-critical programs [including security, environmental, hazardous waste, radiological, meteorological, radioactive material shipments, and computer assisted training]. Programs which are necessary for the reliable generation and transmission of power are also considered Essential. Since RBNP-041 now governs software changes of concern to Operations, this commitment for Operations review and signoff of program changes per EDP-CC-0001 no longer adds value and is deleted.

20. COMMITMENT (7964)

In RBG-31222, dated 7/7/89 transmitting GSU's response to NRC IR 89-11 and specifically in response to violation 8911-01B concerning "Protective Tagging", GSU Stated: The TCN incorporated into (procedure) ADM-0015 also requires a generic statement concerning the use of taped jumpers and alligator-type clips be added to all I&C (instrument & control) and electrical surveillance test procedures during their next revision. I&C and electrical, control room applicable, surveillance test procedures (STPs) will be revised during their next two year revision cycle by adding a generic statement on the use of secure test connections. The revision cycle for all subject STPs ends during July, 1991.

REVISION/JUSTIFICATION

ADM-0015, Surveillance Test Program, requires that jumpers of sufficient length be used or lead connections will be secured together to prevent separation and that insulated clips are preferred to non-insulated clips. Clip selection should consider the application to ensure firm connections and minimize the potential for electrical shorts. The intent of this commitment is captured in the Maintenance Training Program and is a more effective way to minimize recurrence. Closure and tracking of this commitment in all I&C and electrical surveillance test procedures was never necessary to prevent recurrence.

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21. COMMITMENT (8211)

The following commitment is contained in LER 89-036 [concerning "Various System Motor Operated Valves Found Energized Contrary To Plant Fire Hazard Analyses Due To Failure To Implement Design Documents"], per RBG-31778, dated 11/16/89: Administrative Controls will be implemented to allow station personnel while at local Motor Control Centers to open the valve (1B21*MOV019) when needed. This will enable positive control of this pathway in the event of a control room fire.

REVISION/JUSTIFICATION

Revision 2 of Design Criteria 240.201A (Post Fire Safe Shutdown Analysis) has been issued which revised the evaluation of the fire consequences for this valve. As a result of the revised evaluation in 240.201A, the administrative controls for this valve are no longer required. For Fire Area C-25, a manual action has been established in AOP-0031 which requires the operator to close the valves for a control room fire. The new revision of the Safe Shutdown Analysis was processed under MR 96-0020. The Safety Evaluation performed to support this MR is SEN No. 97-0052. Commitment is deleted.

22. COMMITMENT (8372)

In RBG-32284, dated 2/9/90, transmitting GSU's response to NRC IR 89-41 and specifically in response to violation 8941-01 concerning, "Failure To Provide Sufficient Maintenance Work Instructions" and violation 8941-02 concerning "Failure To Perform Post Maintenance Testing" GSU stated: Both recirculation FCV (flow control valve) actuators, refurbished during the last refuel outage, will be refurbished in alternating future refueling outages. (one each refuel).

REVISION/JUSTIFICATION

In response to Notice of Violation 50-458/8941 (severity level IV): "Failure to Provide Sufficient Maintenance Work Instructions" and "Failure to Perform Post Maintenance Testing," this commitment was made. However, this commitment was not directly related to the deficiencies identified in the notice of violation. Plant Engineering recommends deletion of this commitment. The recirculation flow control valve actuator will be refurbished as necessary based on condition monitoring and vendor recommendations.

23. COMMITMENT (8417)

In RBG-31780, License Amendment Request (LAR) 89-04 requesting a change to Technical Specification 4.0.2 GSU stated: "GSU will remove the 3.25 limit from the license, but

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maintain the criteria as an administrative limit in the plant procedures and require management review prior to exceeding the 3.25 criteria."

REVISION/JUSTIFICATION

Amendment 41 of Tech Spec 4.0.2 deleted the 3.25 surveillance interval extension requirement. It was approved by NRC SER RBC-39404 (TAC No. 75325) on the basis that the submittal was consistent with the guidance provided in Generic Letter 89-14 (RBC-38837). This commitment should be deleted as it adds no value to the existing Tech Spec/Bases requirements of SR 3.0.2. It should be noted that part of the justification for the original change was to reduce the administrative burden associated with the 3.25 tolerance and its use. This was explicitly stated in both Generic Letter 89-14 and Amendment 41 SER. It was also stated that removal of the 3.25 limit would provide greater flexibility in the use of the provision for extending surveillance intervals (1.25) and have a positive effect on safety. Both the SER and Generic Letter required that the bases discussion for the 1.25 tolerance extension reflect that "it is not the intent of the allowance for extending surveillance intervals that it be used repeatedly merely as an operational convenience to extend surveillance intervals beyond that specified".

24. COMMITMENT (8439)

In the reply to violation 8939-03, per RBG-32511, dated 3/16/90, GSU stated: All CAS/SAS operators have been instructed that the "mute button" shall not be engaged without concurrence of the security shift supervisor, and if in the event the button is engaged, it shall be documented on the (Security Form) SECFM 111 form with the name of the operator using the button. Prior to the CAS/SAS operator assuming his position, he shall check the "mute button" to ensure it is in the proper position. Each alarm station operator received training concerning the use of the radio communications equipment. The security training group also incorporated this instruction into the training instructions."

REVISION/JUSTIFICATION

New radio consoles were installed in both the Central Alarm Station and the Secondary Alarm Station (CAS/SAS). The new radio consoles, combined with the installation of the new Security Computers in 1996 dramatically reduced the noise levels in CAS/SAS. Alarm station operators can more easily hear radio transmissions, which eliminated the need for frequent checking of the mute button. The commitment is therefore deleted.

25. COMMITMENT (8460)

Violation 8604-01 addressed a "Failure to Administratively Control Temporary Circuit Alterations". The original response to violation 8604-01, per RBG-23508, dated 04/11/86,

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committed Quality Control "... Planners and Lead Inspectors to include a hold point on Electrical Maintenance Work Requests for Category I Electrical Equipment Panels. This will allow for inspection upon completion of work for "lifted leads, jumpers, cleanliness, proper termination and separation." When sufficient information was gathered to reduce the inspection to a quarterly basis the original commitment (5298) was superseded and this commitment (8460) was created on March 28, 1990, per RBG-32575. The supplemental response to violation 8604-01 stated: "Quality Control, on a quarterly basis, will conduct a random sampling of all accessible control room panels during normal plant operation. Additionally, a random sampling of Q-Class 1 electrical panels located in the power block will be conducted prior to plant start-up following any planned outage".

REVISION/JUSTIFICATION

Since that time Quality Control has continued to comply with this commitment. However, the inspections performed for this commitment did not find any of the conditions that caused the violation per NOV 8604-01. This information along with River Bend's Lifted Lead and Jumper procedure (GMP-0042) shows that the original problem with unexplained lifted leads has been satisfactorily resolved. Continuing compliance with this commitment requirement is therefore a burdensome waste of resources with 'no value added'. Further compliance with this commitment should be discontinued [delete commitment].

26. COMMITMENT (8653)

In SCRB-15721, dated 1/25/91 transmitting IR 90-27 Exit Meeting Notes/NRC Conducted Inspections of GSU concerning "welding program enhancements", GSU stated: To correct identified deficiencies with the RBS Welding Program...Maintenance will: review and revise, as required, SSP-7002, "AWS Welding Procedure". NOTE: Subsequent telecon resulted in (incoming letter) RBC-40462, dated 910125, which specified the following exact revision was expected by the NRC, (the "as detailed" tolerances of the AWS D1.1 Code are used by design engineering personnel for the selection of a prequalified weld joint and the additional "as fit-up" tolerances are used by craft and inspection personnel for the aid of construction. As part of these controls, the weld selected will be designated on the drawing using the AWS D1.1 designator.) NOTE 2: Second Telecon (RBC-40660, 910408) added the following "Gilbert had no objections to the procedure revisions GSU had taken in response to the violation, but asked that GSU submit a revised violation response by 910429 clarifying and explaining the procedure."

REVISION/JUSTIFICATION

This is not common practice among the Entergy sites and does not lend any strength to the program. When Design Engineering required a full penetration weld joint on the drawing, then maintenance, who is more familiar with the weld joints, picks the weld joint best suited

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for the fabrication. This weld joint is picked from approved pre-qualified weld joints listed in the Welding Manual. Maintenance needs this latitude for fabrication purposes. Delete this commitment.

27. COMMITMENT (8466)

In LER 90-008 concerning a Reactor Scram due to Main Generator Loss of Field Relay malfunction, under CORRECTIVE ACTION it was stated that: "GSU is revising maintenance procedures to include three phase testing methods for Westinghouse type KLF relays."

REVISION/JUSTIFICATION

With the information available when LER 90-008 was issued, GSU concluded that three-phase testing of KLF relays was the appropriate action to take to detect future occurrences of internal connection problems. However, it is now clear that implementing the vendor recommended single-phase testing is more effective and thoroughly tests each component of the KLF relays. While this commitment did prevent recurrence, it was not the most appropriate course of action to prevent recurrence. Commitment is deleted.

28. COMMITMENT (8790)

In Safeguards Event Report SLER 90-S03, per RBG-34166, dated 12/17/90, concerning inattentive officer acting as compensatory measure, GSU stated: Henceforth, all chairs on compensatory positions will be replaced with backless stools. The stools will be issued to a position when it is established and returned to storage when the compensatory position is closed.

REVISION/JUSTIFICATION

Security processes have evolved since 1990 when this Safeguards Event Report was issued. Security now uses "management" tools to address inattentiveness and alertness issues. Ongoing compliance with this commitment was evaluated and determined to be burdensome and overly responsive to the issue it addressed. The commitment is deleted.

29. COMMITMENT (8893)

Violation 9029-02 addressed a boundary rope at an entrance to a high radiation area which was not restored upon entry/exit [responsible personnel not identified]. In the reply to this violation, per RBG-34386, dated 1/28/91, Item 10 under "CORRECTIVE STEPS WHICH WILL BE TAKEN AVOID FURTHER VIOLATIONS" states: "A monthly operability check will be conducted on high radiation doors."

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REVISION/JUSTIFICATION

High radiation doors, areas posted as High Radiation Areas (100 mrem/hr to 999 mrem/hr) are not required to be locked per River Bend Technical Specification Section 5.7.1. This commitment is revised to specifically define the requirement as to which doors and gates must be locked, i.e. those used as entrances to areas where radiation levels are greater than or equal to 1000 mrem/hr (milli-rem/hour).

The term used in the original commitment "high radiation doors" did not specify the radiation level, and could be interpreted to include those areas with radiation levels greater than or equal to 100 mrem/hr. Such an interpretation, while conservative, is not considered necessary and is not required per River Bend Technical Specification Section 5.7.2.

30. **COMMITMENT** (8894)

Violation 9029-02 addressed a boundary rope at an entrance to a high radiation area which was not restored upon entry/exit [responsible personnel not identified]. In the reply to this violation, per RBG-34386, dated 1/28/91, Item 11 under "CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS" states: "Additional actions to be implemented include the following:

"RBS will change its philosophy with regard to radiation barriers - in that personnel will not be allowed to cross under or over radiation barriers. Only approved entrances/exits set up by Radiation Protection may be used."

REVISION/JUSTIFICATION

Radiological postings on rope barriers are being standardized with the other four Entergy Operations, Inc. (EOI) sites, such that all required postings (e.g. area conditions and entry requirements) will be redundantly placed at intervals along the rope barriers. Therefore, workers approaching rope barriers will be informed of the area conditions and entry requirements at all points along the barriers. This eliminates the need for a requirement that was formerly posted only at the designated entry/exit is the sign that states "Tech Spec Monitoring Required Beyond This Point." Standardization of postings with the other four EOI sites should also result in fewer mistakes by workers who travel from site to site during outages, and who were previously accustomed to different posting practices at their home site. The evolution of the River Bend Radiological Program has rendered this commitment obsolete and it is deleted.

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31. COMMITMENT (8921)

In SCRB-16244, dated 2/12/91, transmitting Memo to File concerning notes of 910131 enforcement conference, (apparent inoperability of ADS (automatic depressurization system) valves at RBS), GSU stated: "Operations personnel will add a caution to the procedure requiring a CR (condition report) to be initiated if SVV (safety vent valve - the non-safety related air supply for the safety/relief valves) Air Dryers are to be bypassed for long periods of time".

REVISION/JUSTIFICATION

The caution has been removed from procedure SOP-0011 due to plant design change by modification request (MR) 91-0001, which removed the capability of bypassing SVV Dryers.

32. COMMITMENT (9332)

In RBG-35377, dated 7/26/91, transmitting GSU's response to NRC IR 91-99 concerning "the Systematic Assessment of Licensee Performance (SALP) for RBS, January 1, 1990 - March 31, 1991", GSU stated: A monthly status of in-process license amendments will allow for better communication between GSU departments and with the NRC to ensure both timely and complete amendment requests.

REVISION/JUSTIFICATION

Deletion of this commitment is justified because the LAR database which provides the status of LAR's is now available for plant-wide use on the shared "S" drive of the RBS LAN (local area network) and on the Licensing Internet (Netscape) page. The commitment resulted from a response to the RBS 1991 SALP report and has limited usefulness from a tracking standpoint.

33. COMMITMENT (9292)

In RBG-35377, dated 7/26/91, Response to NRC IR 91-99, SALP Report, this Radiation Protection commitment action resulted because "We are concerned about losing our Category 1 rating and have implemented several corrective actions that will be effective in returning our performance to the Category 1 rating.": "In order to ensure that heightened attention is given to RP (radiation protection) concerns, a Radiological Incident Report program will be implemented by December 31, 1991."

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REVISION/JUSTIFICATION

Minor radiological concerns were documented on Radiological Awareness Reports (RARs) and major radiological concerns were documented on condition reports (CRs). The RARs were sometimes escalated to CRs. Two documentation systems are redundant, creating unnecessary paperwork and administrative burden. Now, there will no longer be any question about whether a Radiological Awareness Report warrants escalation to a CR. All radiological concerns are now documented on CRs [and this commitment is deleted].

34. **COMMITMENT** (9310)

In the reply to the RBS SALP report, IR 91-99, per RBG-35377, dated 7/26/91, specific examples cited include the removal of detection equipment, failure to detect weaknesses in assessment aids and failure to give sufficient advance planning to the reduction in security force staffing. These inadequacies should have been an indication that critical self-assessment was not being performed by the Security staff. In an effort to correct this problem, a committee with representatives from Security, Quality Assurance and Licensing is being established to review the existing program and any future proposed changes to security plans, procedures and hardware and to identify and eliminate ambiguity.

REVISION/JUSTIFICATION

The committee implemented by this commitment did not fully address the issue of inadequacies in critical self-assessments as outlined in the 1991 issue. Since 1991, the management of the RBS Security Department has changed. GSU merged with Entergy in early 1994. As a result of that merger, new management took over in the Security Department. The change in management eliminated the need for the committee addressed by this commitment and it is deleted.

35. **COMMITMENT** (9829)

In RBG-37309, dated 8/5/92, transmitting the reply to IR 92-15 concerning: Human errors being excessive for tailgating and vital island door degradations and specifically in response to finding number NOV 9215-01 and inspection follow up item number 9215-02, GSU stated: "GSU security management and representatives from the GSU training departments are in the initial planning stages of installing key card readers on two of the general employee training (GET) facility doors for the purpose of actually simulating security door entries with the use of special training key cards. The key card readers to be installed in the training facility will be operable and available for training use by December 15, 1992."

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REVISION/JUSTIFICATION

Though the training key card readers may be used again in the future during Plant Access Training [formerly GET], the use of them is no longer necessary. The original issue of excessive human errors involving tailgating no longer exists. Problems with unsecured doors are at a very low level. This commitment is burdensome and overly responsive to the original issue. It is therefore deleted.

36. COMMITMENT (9949)

In RBG-37648, dated 10/27/92 transmitting SLER 92-S03, concerning: Loss of Safeguards Information (SI). GSU stated: An evaluation was performed and a decision was made to TRANSFER THE OWNERSHIP FUNCTION of the SI program to Document Control and LOCATE THE SI IN THE FIELD ADMINISTRATION BUILDING. This action should be completed by June 30, 1993. ADDED: Per SLER 93-S01, this commitment will be, "... completed as expeditiously as possible."

REVISION/JUSTIFICATION

EOI Management expectations to site personnel establish a heightened awareness for strict compliance, procedural adherence and effective corrective actions. The Safeguards Information Program has undergone marked changes. Control of the Safeguards Information program has been transferred back to the Security Department. Process implementation and program effectiveness will be an ongoing process pursued by the Security Department.

37. COMMITMENT (10005)

GSU's response to IR 92-99 - SALP Report, per RBG-37932, dated 12/18/92, "The radiation deficiency report, noted as a positive initiative in the previous SALP period, will be used as a tool to improve performance. These reports will be dispositioned in a timely manner and will be summarized, trended, and presented to the Plant Manager on a regular basis."

REVISION/JUSTIFICATION

Prior to September, 1996, major radiological concerns were documented on CRs and minor radiological concerns were documented on Radiological Awareness Reports. Since September, 1996, all radiological concerns are being documented on CRs. The reason for this change is that the two documentation systems are redundant, creating unnecessary paperwork and administrative burden. Also, there will no longer be any question about whether a Radiological Awareness Report warrants escalation to a Condition Report, Tracking and trending processes are in place for radiological concerns documented in Condition Reports. [See also the justification for the # 9292 commitment change above.]

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38. COMMITMENT (10015)

In the response to IR 92-99, SALP Report, per RBG-37932, dated 12/18/92, GSU stated: GSU management and our security contractor will strengthen their oversight and awareness of security activities by conducting and documenting the results of tours of security facilities.

REVISION/JUSTIFICATION

Many aspects of the RBS Security program and its management have changed since the RBS Security function was considered a weakness in 1992. New Security management took over in late 1993. GSU's merger with Entergy, which was completed in early 1994 also led to other changes in the Security Department. As reflected in various NRC inspection reports and internal documents, the RBS Security Department is now a strength, with dramatic improvement in the management of the RBS Security Department since 1992. Security conducts various oversight activities. However, a 'commitment' to conduct and document tours of security facilities no longer provides value. It is burdensome, no longer unnecessary, and is deleted.

39. COMMITMENT (11025)

In the reply to violations described in IR 92-15 and IR 93-24, per RBG-40590, dated 5/26/94, EOI stated: Chapter 24, Section 5 of the LTPIP [Long Term Performance Improvement Plan] implemented initiatives to enhance the awareness and sense of ownership of safeguards controls. These initiatives include communication of the significance of Safeguards Information control through pamphlets and posters, in addition to management observation. Surveys will also be performed periodically to confirm the effectiveness of these initiatives.

REVISION/JUSTIFICATION

Awareness and ownership of the Safeguards Information program was enhanced, the significance of appropriate control of Safeguards Information was communicated, and surveys were periodically performed to confirm the effectiveness of the initiatives. The enhancement, communications and surveys, combined with additional changes in the RBS Safeguards Information program were clearly effective in addressing identified weaknesses. Control of Safeguards Information is now considered a strength at RBS. Since the initiatives are clearly complete, there is no value in maintaining a commitment to periodically perform surveys to verify the effectiveness of the initiatives. This commitment is therefore deleted.

40. COMMITMENT (8302)

The reply to violation 8904-02, "Failure To Follow Equipment Control And Maintenance Procedures", per RBG-32142, dated 1/19/90, stated: Procedure ADM-0028 was revised to

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require a written explanation by workers for designating job steps as not applicable (N/A). The steps must also be initialed by the worker and reviewed by the maintenance foreman for concurrence.

REVISION/JUSTIFICATION

RBS processes have evolved since the time that this commitment was made. The portion of this commitment which requires review and concurrence by the maintenance foreman no longer provides a benefit and is now an unnecessary burden. Additionally, the impetus behind generating the corrective action was a violation of procedures/lack of guidance. The procedure, will now allow N/As when they do not change or alter the scope/intent of the procedure. If scope or intent changes then concurrence will be required. Any procedure N/As will be accomplished by an explanation/justification. Commitment is revised to delete the portion requiring maintenance foremen concurrence when scope or intent is not changed.

41. **COMMITMENT** (15023)

The reply to violation 9235-01, per RBG-38312, dated 4/5/93, contained the following commitment: Training and Badge & ID will compare databases on an annual basis.

This violation addressed an incident when unescorted access was not immediately suspended when an individual's plant access training (PAT) expired and the individual unsuccessfully attempted requalification. Subsequently, the individual inappropriately gained access to the protected area on December 4, 16, and 17, 1992. Also, on December 3, 7, 10, 17, and 21, 1992, another individual whose PAT had expired on November 30, 1992, inappropriately gained access to the protected area.

REVISION/JUSTIFICATION

In accordance with procedure TPP-7-018, Training provides a "Badge Pull List" to Access Authorization which is a listing of individuals whose PAT qualifications will expire at 2400 on the last day of the month. This eliminates the need to compare databases.

Also, the RBS Training department forwards to Access Authorization the PAT attendance sheets which indicate the employees who have passed or failed. Access Authorization updates the security computer database with the PAT expiration dates. See also the justification for commitment 15025 below.

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42. COMMITMENT (15025)

The reply to violation 9235-01, per RBG-38312, dated 4/5/93, contained the following commitment: Badge & ID will review, on a monthly basis, a security printout ensuring all individuals with unescorted access have an assigned GET I expiration date.

This violation addressed an incident when unescorted access was not immediately suspended when an individual's PAT expired and the individual unsuccessfully attempted requalification. Subsequently, the individual inappropriately gain access to the protected area on December 4, 16, and 17, 1992. Also, on December 3, 7, 10, 17, and 21, 1992, another individual whose PAT had expired on November 30, 1992, inappropriately gained access to the protected area.

REVISION/JUSTIFICATION

Since the security computer no longer accepts null values, keycards cannot be loaded without expiration dates. Each keycard now has two dates loaded into the security computer: 1) the expiration date for the keycard (though the date on some is indefinite), and 2) the PAT expiration date. If either date is exceeded, the keycard will not function - access not allowed. A monthly review of a printout indicating PAT expiration dates for active keycards adds no value and is a waste of resources. This commitment is therefore deleted.

43. COMMITMENT (11851)

In the revised response to IR 93-14 [NOV 9314-01, concerning "Failure To Follow Procedure Resulted In Weapon Discharge In Protected Area"], per RBG-41243, dated 3/2/95, EOI stated: "RBS will conduct future (security) drills as follows: A safety briefing will be conducted prior to the start of the drills."

REVISION/JUSTIFICATION

Safety briefings are routinely held in all types of infrequently performed evolutions. The EOI Safety Program adequately addresses the need for safety briefings, therefore, the commitment to specifically hold safety briefing's before security drills is unnecessary.

44. COMMITMENT (13919)

Bulletin 93-02 is entitled "Debris Plugging of Emergency Core Cooling Suction Strainers." The following statement was contained in the RBS reply to Bulletin 93-02 per RBG-38617, dated 6/8/93: "RBS has in place, as part of our Suppression Pool Cleanliness Program, a policy to visually inspect the ECCS suction strainers located in the suppression pool for debris during each cold shutdown greater than 10 days."

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Bulletin 95-02 is entitled "Unexpected Clogging of a Residual Heat Removal (RHR) Pump Strainer While Operating in Suppression Pool Cooling Mode." The Bulletin identified five requested actions. The third requested action addresses cleaning the Suppression Pool and establishing of a Suppression Pool Cleaning Program. In the RBS reply to Bulletin 95-02 per RBG-42171, dated 11/16/95 and specifically to requested action number three, the Suppression Pool was cleaned and a program was established for cleaning the Suppression Pool every refueling outage. However, an additional sentence was included in the reply to this requested action which stated: "Additionally, RBS currently inspects all ECCS suction strainers during each cold shutdown of sufficient duration."

REVISION/JUSTIFICATION

Due to the completion of modifications to the plant installing a Suppression Pool Cleanup (SPC), Cooling, and Alternate Decay Heat Removal System (MR 95-0009 and MR 95-0010), the Suppression Pool water clarity has improved such that all ECCS suction strainers can be visually observed by personnel from the 95' elevation of containment. This may require the use of an underwater light to facilitate viewing each of the ECCS suction strainers, especially those in low light areas. This inspection can now take place at any time or plant operating condition. A failure of the SPC system to provide pool cleanup will have no adverse impact upon the ability of the pool to perform its functions. If water quality degrades to the point that the ECCS suction strainers can no longer be visually inspected with the aid of an underwater light then additional measures should be taken to complete the inspection during the next refueling outage. This could include but is not limited to the use of underwater video cameras, robotics, or divers.

In addition, an Engineering Request (ER 97-0147) has been completed in response to NRC Bulletin 96-03 for the Emergency Core Cooling Systems (ECCS) Suction Strainers. The existing Residual Heat Removal (RHR) and High/Low Pressure LPCS & HPCS (CS) Suction Strainers have been replaced with larger capacity passive-strainers. The new strainers have been installed on the ECCS suction lines which include the CS and the RHR systems. The new strainers employ a passive-type design which does not require operator action to assure uninterrupted suction flow to the ECCS systems. The new design increased the strainer surface area/volume and ensured that the maximum anticipated strainer debris loading resulting from a design basis Loss of Coolant Accident (LOCA) will not result in the available Net Positive Suction Head (NPSH) pressure falling below the required NPSH for the ECCS pumps. The debris loading capacity of the new strainer has increased the available margin for both NPSH and debris quantities over the existing plant design.

The completion of both the SPC system and new ECCS strainer installation should ensure operability of the ECCS pumps and maintain long-term recirculation cooling capability during post LOCA conditions. Inspections of the ECCS suction strainers and surrounding areas will now be performed during each planned refuel outage.

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45. COMMITMENT (10003)

The reply to IR 92-99 (SALP Report), per RBG-37932, dated 12/18/92, contained the following commitment: The Operations Department will monitor plant housekeeping status and provide direct feedback at plant meetings to improve effectiveness.

REVISION/JUSTIFICATION

The materiel condition of the River Bend plant as well as housekeeping has improved dramatically since the 1992 time frame. The new Entergy management team which took over after the GSU/Entergy merger was completed in January of 1994, placed primary emphasis on improving plant materiel condition and housekeeping. Plant housekeeping is now considered a strength at RBS. Various NRC inspection reports and internal documents reflect the improvements in plant materiel condition as well as housekeeping. Operations still monitors housekeeping and provides direct feedback to supervision. However, a regulatory commitment to provide direct feedback on plant housekeeping at plant meetings no longer adds value and is deleted.

46. COMMITMENT (7846)

In reply to the RBS SALP Report, IR 90-01, per RBG-32748, dated 4/27/90, GSU stated: Corporate Security Group will provide Senior Vice President River Bend Nuclear Group quarterly River Bend Security Program effectiveness reports. First report due September 30, 1989.

REVISION/JUSTIFICATION

In RBG-35698, dated 9/30/91, GSU noted that "efforts by GSU's management have continued toward further improvement to the point that the frequency of QA surveillances and corporate security audits are now being reduced so that some of these resources can be redirected to other areas. GSU will continue security surveillances on a random basis in accordance with prudent QA practices. As stated by GSU in the 1990-91 SALP report response, Security will continue to evaluate identified problems and implement timely corrective action. GSU continues to be committed to improve the security program."

It is evident from the discussion in RBG-35698 that GSU was reducing the level of activity directed at improving the RBS Security program. Though not clearly stated, this reduction was intended to also apply to quarterly reporting by Corporate Security to the RBS Vice President. Many additional changes have been made in the management of the RBS Security program as well as various aspects of the physical security system since 1991. Particularly since 1994, RBS Security performance has been a strength. Various NRC inspection reports as well as internal documents reflect the high level of performance of the RBS Security

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program. This commitment no longer adds value. The performance weaknesses which existed in the RBS Security program in the 1989 time frame have been resolved for several years. Further tracking of the commitment is discontinued and it is deleted.