

RBG-48247

10 CFR 2.201

August 21, 2023

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Reply to Notice of Violation; EA-23-055

River Bend Station, Unit 1
NRC Docket No. 50-458
Renewed Facility Operating License No. NPF-47

Reference: NRC letter to Entergy, "River Bend Station – Final Significance Determination of a White Finding, Notice of Violation, and Follow-Up Assessment Letter; NRC Inspection Report 05000458/2023091," (ADAMS Accession No. ML23187A639), dated July 20, 2023.

In accordance with 10 CFR 2.201, Entergy Operations, Inc. (Entergy) hereby submits the Reply to Notice of Violation, EA-23-055, for River Bend Station, Unit 1 (River Bend). As requested, the Enclosure contains the following: (1) the reason for the violation; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken; and (4) the date when full compliance will be achieved.

This letter contains no new commitments.

Should you have any questions concerning this issue, please contact Randy Crawford, Manager, Regulatory Assurance, at 225-381-4177.

Respectfully,



Phil Hansett

PH/hpk

RBG-48247
Page 2 of 2

Enclosure: Reply to Notice of Violation; EA-23-055

cc: NRC Regional Administrator – Region IV
NRC Senior Resident Inspector – River Bend Station
NRC Document Control Desk
R4Enforcement@nrc.gov

Enclosure

RBG-48247

Reply to Notice of Violation; EA-23-055

**Reply to Notice of Violation
EA-23-055**

In the U.S. Nuclear Regulatory Commission (NRC) letter to Entergy Operations, Inc. (Entergy), "River Bend Station – Final Significance Determination of a White Finding, Notice of Violation, and Follow-Up Assessment Letter; NRC Inspection Report 05000458/2023091," (ADAMS Accession No. ML23187A639), dated July 20, 2023, the NRC issued Notice of Violation EA-23-055 to Entergy's River Bend Station (River Bend) as restated below:

Technical Specification 5.4.1.a, requires, in part, that written procedures shall be established, implemented, and maintained covering the activities recommended in Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operational)" revision 2, Appendix A. Regulatory Guide 1.33, revision 2, Appendix A, section 9.a, requires, in part, that maintenance that can affect the performance of safety-related equipment should be properly preplanned and performed in accordance with written procedures, or documented instructions appropriate to the circumstances.

The licensee established Work Order 53003640 to clean, inspect, and test high pressure core spray transformer E22-S003. Work Order 53003640 step 4.1.10 requires, in part, to inspect all wiring for signs of degradation, cracked insulation and overheating, and step 4.1.13 requires, in part, to inspect for loose nuts, bolts, set screws or other fasteners.

Contrary to the above, on June 21, 2022, the licensee failed to implement procedures recommended by Regulatory Guide 1.33, revision 2, Appendix A. Specifically, when performing a cleaning and inspection of high pressure core spray Transformer E22-S003, the licensee failed to adequately perform Work Order 53003640 step 4.1.10 to inspect all wiring for signs of degradation, cracked insulation and overheating, and step 4.1.13 to inspect for loose nuts, bolts, set screws, or other fasteners. As a result, the transformer failed, causing the high pressure core spray system and standby service water pump SWP-P2C to be inoperable.

Pursuant to the provisions of 10 CFR 2.201, this Enclosure provides Entergy's Reply to Notice of Violation, EA-23-055.

1) Reason for the Violation

On September 19, 2022, while performing STP-309-0203, Division (DIV) III Diesel Generator Operability Test, the DIV III Diesel Generator was started and approximately 5 seconds later the Main Control Room received multiple alarms on DIV III components. Field operators reported that E22-S003, High Pressure Core Spray (HPCS) Transformer Feeder showed signs of overheating.

A Root Cause Evaluation (RCE) and an Equipment Failure Evaluation was conducted, which determined that the direct cause for the E22-S003 HPCS Transformer fault was caused by a spare conductor of cable 1CSHCOK300 landing on top of the low voltage windings creating a fault, requiring replacement of the transformer.

The RCE determined the root cause for the HPCS Transformer Failure is "Maintenance Electrical work processes (procedure and training) did not require use of intrusive methods to

identify degradation in wiring and / or connections in E22-S003 HPCS transformer, resulting in failure of E22-S003 HPCS transformer.”

2) Corrective Steps That Have Been Taken and the Results Achieved

Entergy took appropriate actions by installing a replacement transformer per Temporary Modification (TMOD) EC 93841 under Work Order (WO) 586001, which also verified no loose wires were present in an “as-left” condition.

3) Corrective Steps That Will Be Taken

- Corrective actions are in place to determine a permanent solution to the E22-S003 transformer.
- Corrective Actions to Prevent Reoccurrence (CAPR) are as follows:
 - Revise the Preventative Maintenance (PM) Model WO 50348709 / PMRQ 50037101-01 to include the use of intrusive methods to identify degradation in wiring and / or connections in E22-S003 HPCS transformer.
 - Revise Training Qualification Card FQC-EMT1-CURRENTXTXFRMR to include more specifics on performing inspections on all wiring connections of dry transformers and to include CR-RBS-2023-00412 as referenced Operating Experience (OE).

4) Date When Full Compliance Will Be Achieved

The station achieved full compliance on September 30, 2022, when the E22-S003 HPCS Transformer was installed, returned to service, and the station exited the 14-day LCO Action Statement.

