



**Randy Crawford**  
Regulatory Assurance Manager  
River Bend Station  
225-381-4177

RBG-48311

10 CFR 2.201

August 28, 2024

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

Subject: Reply to a Notice of Violation, NRC Inspection Report 05000458/2024002  
  
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 – Integrated Inspection Report 05000458/2024002 and Notice of Violation," (ADAMS Accession No. ML24205A039), dated July 30, 2024

In accordance with 10 CFR 2.201, Entergy Operations, Inc. (Entergy) hereby submits the Reply to a Notice of Violation 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 me at 225-381-4177.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Randy Crawford', with a long horizontal flourish extending to the right.

Randy Crawford

RW/ hpk

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

**Enclosure**

**RBG-48311**

**Reply to a Notice of Violation, NRC Inspection Report 05000458/2024002**

## Reply to a Notice of Violation

In the U.S. Nuclear Regulatory Commission (NRC) letter to Entergy Operations, Inc. (Entergy), "River Bend Station – Integrated Inspection Report 05000458/2024002 and Notice of Violation," (ADAMS Accession No. ML24205A039), dated July 30, 2024, the NRC issued Notice of Violation to Entergy's River Bend Station (RBS) as restated below:

10 CFR Part 50, appendix B, criterion III, requires in part, that for those structures, systems, and components to which 10 CFR Part 50 appendix B applies, measures shall be established to ensure that the design basis is correctly translated into specifications, drawings, procedures, and instructions.

Contrary to the above, from March 2023 to June 30, 2024, for quality-related components associated with both the standby and high pressure core spray diesel generator starting systems to which 10 CFR Part 50 appendix B applies, the licensee failed to ensure that the design basis was correctly translated into specifications, drawings, procedures, and instructions. Specifically, the licensee failed to ensure that the design basis for both the standby and high pressure core spray diesel generator air receivers was demonstrated, through appropriate testing or calculational methods, to ensure the ability to perform five 10-second starts from either subsystem from the lowest possible air pressure under the most adverse design conditions.

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

### 1) Reason for the Violation

The inspectors reviewed corrective actions associated with non-cited violation (NCV) 05000458/2023001-01 from Inspection Report 05000458/2023001 (ADAMS Accession No. ML23296A251), of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," and identified that RBS did not restore compliance with the requirements of 10 CFR Part 50, Appendix B, Criterion III. Specifically, RBS failed to correct the NCV and restore compliance when they closed the corrective actions for the violation.

An Organizational and Programmatic (O&P) Screening was performed and determined that RBS Engineering and Regulatory Assurance personnel inappropriately closed a condition report (CR-RBS-2023-00875) that was intended to correct and address the non-cited violation issued in NRC inspection report 05000458/2023003, resulting in a failure to restore compliance.

Entergy determined the causes for the inappropriate closure of the Condition Report was that engineers performing corrective actions associated with CR-RBS-2023-00875 did not understand the CR in its entirety. The CR included two separate, but very similar violations, that pertained to the Standby and Emergency Diesels. Individuals performing corrective actions, not understanding the CR holistically, did not recognize the different violations that were being addressed and that multiple violations were specified in the causal analysis. It was also determined that the closure review process for CRs addressing multiple NRC violations was not prescriptively followed. This process, if implemented correctly, would have resulted in a recognition by Engineering management and/or Regulatory Assurance management that the Actions were not completed appropriately.

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

Actions that have been taken to restore compliance include actions to ensure that the proper planning and development for the work orders for performing air start testing on Division I or II Emergency Diesel Generator (EDG), and Division III EDG are completed and the design basis is correctly translated into specifications, drawings, procedures, and/or instructions. These actions are documented within CR-RBS-2024-02380.

## **3) Corrective Steps That Will Be Taken**

- Corrective actions to restore compliance:
  - Develop Work Orders (WOs) to perform air start testing of either Div I or Div II EDG and the Div III EDG on the most restrictive air banks, starting at minimum receiver tank pressure accounting for instrument error. Testing should include air start timing for trending purposes.
  - Conduct air start testing and document results.
  - Ensure that RBS correctly translated the design basis into specifications, drawings, procedures, and instructions.
- Corrective Actions to address behaviors:
  - Present a Teaching & Learning session for Engineering Department on the topic of NRC Violations. This session will focus on the following subjects: Recognizing and Reducing Regulatory Risk, Reactor Oversight Process, Violation / Findings, Cross Cutting Aspects, Violation and Performance Indicator Significance.
  - Perform an interim review of open CRs with multiple violations for the next three months to ensure each violation is being addressed.
  - Perform a review of all open CRs, addressing NRC violations, to ensure a Licensing Review is required for closure.

## **4) Date When Full Compliance Will Be Achieved**

The station will achieve full compliance on February 13, 2025, when the actions above are completed and the necessary design basis information is incorporated into applicable specifications, drawings, procedures, and/or instructions for the Emergency and Standby Diesel Generator Air Banks.