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Rick J. King
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May 8, 2000

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

Subject: River Bend Station
Docket No. 50-458
License No. NPF-47
Licensee Event Report 50-458 / 00-06-00

File Nos. G9.5, G9.25.1.3

RBG-45342
RBF1-00-0109

Ladies and Gentlemen:

In accordance with 10CFR50.73, enclosed is the subject Licensee Event Report. There are no commitments in this document.

Sincerely,

JW Leavines for

RJK/dhw
enclosure

IE22

cc: U. S. Nuclear Regulatory Commission
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NRC FORM 366 U.S. NUCLEAR REGULATORY COMMISSION
(6-1998)

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

APPROVED BY OMB NO. 3150-0104 EXPIRES 06/30/2001

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
River Bend Station	05000-458	1 of 3

TITLE (4)
Noncompliance With Technical Specifications During Control Rod Scram Time Testing Due to Procedure Implementation Error

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 NAME	DOCKET NUMBER
04	08	2000	2000	06	00	05	08	2000	FACILITY NAME	DOCKET NUMBER

OPERATING MODE (9)	1
POWER LEVEL (10)	10%

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)

	20.2201(b)		20.2203(a)(2)(v)	X	50.73(a)(2)(i)		50.73(a)(2)(viii)
	20.2203(a)(1)		20.2203(a)(3)(i)		50.73(a)(2)(ii)		50.73(a)(2)(x)
	20.2203(a)(2)(i)		20.2203(a)(3)(ii)		50.73(a)(2)(iii)		73.71
	20.2203(a)(2)(ii)		20.2203(a)(4)		50.73(a)(2)(iv)		OTHER
	20.2203(a)(2)(iii)		50.36(c)(1)		50.73(a)(2)(v)		Specify in Abstract below or in NRC Form 366A
	20.2203(a)(2)(iv)		50.36(c)(2)		50.73(a)(2)(vii)		

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER (Include Area Code)
J. W. Leavines, Manager - Licensing	225-381-4642

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

SUPPLEMENTAL REPORT EXPECTED (14)			EXPECTED	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE).	✓	NO				

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On April 8, 2000, with the plant at approximately 10% power, a reactor control rod was withdrawn without meeting the applicable requirements of River Bend Technical Specifications (TS) and station procedures. Specifically, the TS requires a control rod drop accident (CRDA) analysis for such testing when it is performed below 20% rated reactor power. The control rod was undergoing a scheduled scram time surveillance test following a plant startup from a refueling outage. The control rod was out of its approved position for approximately six minutes before being fully reinserted into the core. This event is being reported in accordance with 10CFR50.73(a)(2)(i)(B) as operation prohibited by Technical Specifications.

The cause of this event was inadequate procedure implementation by the personnel performing the test. Procedure requirements were not correctly followed in that a specific CRDA analysis for this test was not performed or obtained prior to test performance. Subsequent analysis found that a postulated rod drop accident for the control rod being tested was bounded by a previous vendor analysis which demonstrated that assumptions in the River Bend Updated Safety Analysis Report would have been met. This event had minimal potential to affect the health and safety of the public.

FACILITY NAME (1)	DOCKET (2) NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
River Bend Station	05000-458	00	-- 06 --	00	2 OF 3

REPORTED CONDITION

On April 8, 2000, with the plant at approximately 10% power, a reactor (**RCT**) control rod was withdrawn without meeting the applicable requirements of River Bend Technical Specifications (TS) and station procedures. Specifically, the TS requires a control rod drop accident (CRDA) analysis for such testing when it is performed below 20% rated reactor power. The control rod was undergoing a scheduled scram time surveillance test following a plant startup from a refueling outage. The control rod was out of its approved position for approximately six minutes before being fully reinserted into the core. This event is being reported in accordance with 10CFR50.73(a)(2)(i)(B) as operation prohibited by Technical Specifications.

INVESTIGATION AND IMMEDIATE CORRECTIVE ACTION

The Limiting Condition for Operation (LCO) in Technical Specification (TS) 3.1.6, "Control Rod Pattern," requires that reactor control rods be positioned in accordance with the banked position withdrawal sequence (BPWS) when reactor power is at or below 20% rated thermal power. This specification assures that control rod patterns are consistent with the assumptions of the control rod drop accident (CRDA) analysis of the River Bend Updated Safety Analysis Report (USAR). The action statement for that specification requires that for one or more operable control rods not in compliance with BPWS, the control rod(s) must be moved to the correct position within eight hours.

TS LCO 3.10.7, "Control Rod Testing – Operating," allows exception to the control rod pattern constraints of TS 3.1.6 for specific reasons, such as scram time testing. This exception is allowed provided that conformance to the approved control rod sequence for the test is maintained and verified by a second licensed reactor operator or other qualified member of the technical staff. The basis of this specification requires that a special CRDA analysis be performed to demonstrate that, should a CRDA occur during testing, there will be no unacceptable consequences. The action statement for not meeting the requirements of LCO 3.10.7 directs that test performance and the exception to LCO 3.1.6 be immediately suspended.

The scram time test was originally planned to occur when reactor power was at 35%, but due to delays in the plant startup, the test was moved up on the schedule. The requirements of TS LCO 3.1.6 are not applicable when reactor power is greater than 20%, so the noncompliance would not have occurred had the test been performed as originally planned. When the test was rescheduled, it was not recognized that the additional requirements concerning a special CRDA would have to be implemented.

A total of seven control rods were tested at the time of this event. Only one control rod was moved out of its approved sequence. The control rod was tested and returned to the fully inserted position before it was recognized that a procedure violation had occurred. The control rod was out of compliance with its BPWS for approximately six minutes.

CAUSE AND CORRECTIVE ACTION TO PREVENT RECURRENCE

The cause of this event was inadequate procedure implementation by the personnel performing the test. Procedure requirements were not correctly followed in that a specific CRDA analysis for this test was not performed or obtained. A human performance error review was conducted to characterize contributing factors to the event. The event is being reviewed by River Bend senior management, and further corrective actions will be developed and tracked in River Bend's corrective action program.

SAFETY SIGNIFICANCE

The elapsed time in which the position constraints on the control rod were bypassed and the rod was moved out of its normal sequence was approximately six minutes. The rod functioned normally and the scram time was found acceptable.

Computer modeling was used to determine the reactivity of the control rod in question, as well as that of other control rods in the same core quadrant assuming that rod was fully withdrawn. This information, in conjunction with an analysis previously performed by River Bend's reactor vendor to support changing River Bend's low power set point, found that a rod drop accident postulated for this event would not have caused assumptions made in the USAR to have been exceeded and was bounded by the analysis. Therefore, this event had minimal potential to affect the health and safety of the public.

(Note: Energy industry component identification codes are annotated in the text as (**XXX**).)