

|   |        |   |                |                     |  |                   |                                       |   |                               |  |        |           |              |                     |
|---|--------|---|----------------|---------------------|--|-------------------|---------------------------------------|---|-------------------------------|--|--------|-----------|--------------|---------------------|
| NRC FORM 366<br>(5-92)  |        | U.S. NUCLEAR REGULATORY COMMISSION  |                |                     | APPROVED BY OMB NO. 3150-0104<br>EXPIRES 5/31/95 |                   |                                       |   |                               |  |        |           |              |                     |
| <b>LICENSEE EVENT REPORT (LER)</b><br><br>(See reverse for required number of digits/characters for each block)   |        |   |                |                     |  |                   |                                       |   |                               | ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNRB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20585-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503. |        |           |              |                     |
| FACILITY NAME (3)<br><b>RIVER BEND STATION</b>  |        |   |                |                     |  |                   | DOCKET NUMBER (2)<br><b>05000 458</b> |   |                               | PAGE (3)<br><b>1 OF 6</b>  |        |           |              |                     |
| TITLE (4) <b>TECHNICAL SPECIFICATION SURVEILLANCE REQUIREMENTS NOT PROPERLY IMPLEMENTED IN LOGIC SYSTEM FUNCTIONAL TESTS</b>  |        |   |                |                     |  |                   |                                       |   |                               |  |        |           |              |                     |
| EVENT DATE (5)  |        |   | LER NUMBER (6) |                     |  | REPORT NUMBER (7) |                                       |   | OTHER FACILITIES INVOLVED (8) |  |        |           |              |                     |
| MONTH   | DAY    | YEAR  | YEAR           | SEQUENTIAL NUMBER   | REVISION NUMBER                                  | MONTH             | DAY                                   | YEAR                                      | FACILITY NAME                 | DOCKET NUMBER  |        |           |              |                     |
| 02  | 25     | 93  | 93             | 002                 | 01   | 04                | 02                                    | 93  | FACILITY NAME                 | DOCKET NUMBER  |        |           |              |                     |
|   |        |   |                |                     |  |                   |                                       |   | 05000                         |  |        |           |              |                     |
|   |        |   |                |                     |  |                   |                                       |   | 05000                         |  |        |           |              |                     |
| OPERATING MODE (9)  |        | THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11) |                |                     |  |                   |                                       |   |                               |  |        |           |              |                     |
| 1   |        | 20.402(b)   |                |                     |  |                   |                                       |   |                               |  |        |           |              |                     |
| POWER LEVEL (10)  |        | 20.405(c)   |                |                     |  |                   |                                       |   |                               |  |        |           |              |                     |
| 100   |        | 50.36(c)(1)   |                |                     |  |                   |                                       |   |                               |  |        |           |              |                     |
|   |        | 50.73(a)(2)(iv)   |                |                     |  |                   |                                       |   |                               |  |        |           |              |                     |
|   |        | 72.1(b)   |                |                     |  |                   |                                       |   |                               |  |        |           |              |                     |
|   |        | 50.73(a)(2)(v)  |                |                     |  |                   |                                       |   |                               |  |        |           |              |                     |
|   |        | 73.71(c)  |                |                     |  |                   |                                       |   |                               |  |        |           |              |                     |
|   |        | 50.73(a)(2)(vi)   |                |                     |  |                   |                                       |   |                               |  |        |           |              |                     |
|   |        | OTHER   |                |                     |  |                   |                                       |   |                               |  |        |           |              |                     |
|   |        | 50.73(a)(2)(vii)(A)   |                |                     |  |                   |                                       |   |                               |  |        |           |              |                     |
|   |        | (Specify in Abstract below and in Text, NRC Form 366A)                                      |                |                     |  |                   |                                       |   |                               |  |        |           |              |                     |
|   |        | 50.73(a)(2)(vii)(B)   |                |                     |  |                   |                                       |   |                               |  |        |           |              |                     |
|   |        | 50.73(a)(2)(x)  |                |                     |  |                   |                                       |   |                               |  |        |           |              |                     |
| LICENSEE CONTACT FOR THIS LER (12)  |        |   |                |                     |  |                   |                                       |   |                               |  |        |           |              |                     |
| NAME<br><b>L.A. ENGLAND, DIRECTOR - NUCLEAR LICENSING</b>   |        |   |                |                     |  |                   |                                       | TELEPHONE NUMBER<br><b>(504) 381-4145</b> |                               |  |        |           |              |                     |
| COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)  |        |   |                |                     |  |                   |                                       |   |                               |  |        |           |              |                     |
| CAUSE   | SYSTEM | COMPONENT   | MANUFACTURER   | REPORTABLE TO NRRDS | CAUSE  | SYSTEM            | COMPONENT                             | MANUFACTURER                              | REPORTABLE TO NRRDS           | CAUSE  | SYSTEM | COMPONENT | MANUFACTURER | REPORTABLE TO NRRDS |
|   |        |   |                |                     |  |                   |                                       |   |                               |  |        |           |              |                     |
|   |        |   |                |                     |  |                   |                                       |   |                               |  |        |           |              |                     |
|   |        |   |                |                     |  |                   |                                       |   |                               |  |        |           |              |                     |
| SUPPLEMENTAL REPORT EXPECTED (14)   |        |   |                |                     |  |                   |                                       |   |                               | EXPECTED SUBMISSION DATE (15)  |        | MONTH     | DAY          | YEAR                |
| X YES<br>(If yes, complete EXPECTED SUBMISSION DATE)  |        |   |                |                     |  |                   |                                       |   |                               | NO   |        | 05        | 31           | 93                  |
| ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)  |        |   |                |                     |  |                   |                                       |   |                               |  |        |           |              |                     |
| <p>On February 12, 1993 with the plant at 100 percent power (Operational Condition 1), a deficiency in plant surveillance test procedures (STPs) was identified. During a safety system functional assessment (SSFA) performed by Quality Assurance, it was discovered that the logic system functional test (LSFT) that verifies the isolation of reactor core isolation cooling system (RCIC) valve E51-F045 on a reactor water level 8 signal was not being completely satisfied.</p> <p>Technical Specifications (TS) require that an LSFT and simulated automatic operation of all channels be performed at least once per 18 months. A combination of three surveillance test procedures was intended to meet the TS surveillance requirements; however, the SSFA revealed that these procedures do not provide proper overlap.</p> <p>Further reviews of STPs revealed two additional missed overlap points. One of these was the low pressure core spray / low pressure coolant injection (LPCS/LPCI) injection valves E21-F005 and E12-F042A permissive actuation instrumentation channels/circuitry for reactor vessel pressure - low. The other condition is the LSFT requirement to verify that Division II balance of plant (BOP) isolation valves will isolate on a high drywell pressure signal. This report is submitted pursuant to 10CFR50.73(a)(2)(i)(b) as operation prohibited by the Technical Specifications due to the deficiencies in implementing the surveillance requirements.</p> <p>GSU has accelerated the review schedule for STPs which perform LSFTs. A supplement to this LER will be issued by May 31, 1993 to document additional LSFT overlap conditions discovered as a result of this review.</p> |        |   |                |                     |  |                   |                                       |   |                               |  |        |           |              |                     |

REQUIRED NUMBER OF DIGITS/CHARACTERS  
FOR EACH BLOCK

| BLOCK<br>NUMBER | NUMBER OF<br>DIGITS/CHARACTERS  | TITLE                        |
|-----------------|---|------------------------------|
| 1               | UP TO 46  | FACILITY NAME                |
| 2               | 8 TOTAL<br>3 IN ADDITION TO 05000   | DOCKET NUMBER                |
| 3               | VARIES  | PAGE NUMBER                  |
| 4               | UP TO 76  | TITLE                        |
| 5               | 6 TOTAL<br>2 PER BLOCK  | EVENT DATE                   |
| 6               | 7 TOTAL<br>2 FOR YEAR<br>3 FOR SEQUENTIAL NUMBER<br>2 FOR REVISION NUMBER             | LER NUMBER                   |
| 7               | 6 TOTAL<br>2 PER BLOCK  | REPORT DATE                  |
| 8               | UP TO 18 -- FACILITY NAME<br>8 TOTAL -- DOCKET NUMBER<br>3 IN ADDITION TO 05000       | OTHER FACILITIES INVOLVED    |
| 9               | 1   | OPERATING MODE               |
| 10              | 3   | POWER LEVEL                  |
| 11              | 1<br>CHECK BOX THAT APPLIES   | REQUIREMENTS OF 10 CFR       |
| 12              | UP TO 50 FOR NAME<br>14 FOR TELEPHONE   | LICENSEE CONTACT             |
| 13              | CAUSE VARIES<br>2 FOR SYSTEM<br>4 FOR COMPONENT<br>4 FOR MANUFACTURER<br>NPRDS VARIES | EACH COMPONENT FAILURE       |
| 14              | 1<br>CHECK BOX THAT APPLIES   | SUPPLEMENTAL REPORT EXPECTED |
| 15              | 6 TOTAL<br>2 PER BLOCK  | EXPECTED SUBMISSION DATE     |

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

**REPORTED CONDITION**

On February 12, 1993 with the plant at 100 percent power (Operational Condition 1), a deficiency in plant surveillance test procedures (STPs) was identified. During a safety system functional assessment (SSFA) performed by Quality Assurance, it was discovered that the logic system functional test (LSFT) that verifies the isolation of reactor core isolation cooling system (RCIC) (\*BN\*) valve (\*V\*) E51-F045 on a reactor water level 8 signal was not being completely satisfied.

Technical Specification (TS) Table 4.3.5.1-1-1.b and TS 4.3.5.2 requires that a logic system functional test and simulated automatic operation of all channels be performed at least once per 18 months. The combinations of STP-209-0601, STP-051-4226, and STP-051-4227 were intended to meet the TS surveillance requirements; however, the SSFA revealed that these procedures do not provide proper overlap. The last performance of these STPs such that the TS requirements were met was on November 13, 1985. This report is submitted pursuant to 10CFR50.73(a)(2)(i)(b) as operation prohibited by the Technical Specifications.

Further reviews of STPs revealed two additional missed overlap points. One of these was the low pressure core spray (\*BM\*) / low pressure coolant injection (\*BO\*) (LPCS/LPCI) injection valves (\*V\*) E21-F005 and E12-F042A permissive actuation instrumentation channels/circuitry for reactor vessel pressure - low. The other condition is the LSFT requirement to verify that Division II balance of plant (BOP) isolation valves (\*V\*) will isolate on a high drywell pressure signal.

**INVESTIGATION**

The logic system functional test (LSFT) requirement to verify that RCIC valve E51-F045 (\*V\*) will isolate on a reactor water level 8 signal is implemented by the combination of STP-051-4226, STP-051-4227 and STP-209-0601. Review of these procedures has shown that proper overlap between them is not provided.

The logic for this circuit requires that two level transmitters (\*LT\*) both sense that a level 8 condition exists for the isolation to occur. Each of the level transmitters (\*LT\*) sends a signal to a trip unit. When the trip unit receives a level 8 signal from the transmitter, it trips, causing a contact to close. The contacts from the two trip units are in series. When both of these contacts close, relay (\*RLY\*) B21-K92 is energized, which causes the E51-F045 valve (\*V\*) to close. Surveillance test procedure STP-051-4226 verifies that if there is a high level signal at transmitter (\*LT\*) B21-N095A, contact M1/T1 of relay B21-K62 closes. This is one of the two contacts needed to energize relay B21-K92. Surveillance test procedure STP-051-4227 verifies that a level 8

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| NRC FORM 366A<br>(5-92)                                 |  | U.S. NUCLEAR REGULATORY COMMISSION |  | APPROVED BY OMB NO. 3150-0104<br>EXPIRES 5/31/95   |                      |
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condition at the other reactor vessel level transmitter (\*LT\*), B21-N095B, will cause contact M1/T1 of relay (\*RLY\*) B21-K14 to close. This is the second contact needed to energize relay (\*RLY\*) B21-K92. Surveillance test procedure STP-209-0601 jumpers a lead from terminal TB0004-1 and terminal TB0004-03 which supplies 125VDC to relay (\*RLY\*) B21-K92. Valve (\*V\*) E51-F045 is then checked to see if it closed when the jumper was installed. The combination of these three STPs are designed to check all of the circuitry from the transmitters to the valve. However, portions of wiring between each of the relays are not checked by the STPs as written. Therefore, proper overlap between the STPs did not exist.

Based on a review of the STPs, TS Table 4.3.5.1-1-1.b, and TS 4.3.5.2 it is apparent that the surveillance requirements were not met. A search through previous performance of these STPs showed that the last time that the surveillance was met was on November 13, 1985. At that time, STP-051-4226 checked the circuitry beyond relay (\*RLY\*) K62 and actually cycled valve (\*V\*) E51-F045. During revision 3 of this procedure it was changed to the method of testing currently used. Based on the correct performance of the surveillance on November 13, 1985, the surveillance became overdue on October 2, 1987. Continuity checks performed by Prompt MWO 059403, on the wiring that was not checked by the STPs, showed that there was no problem with the wiring. This check also completed the overlap between the STPs. The combination of this MWO and the STPs meets the surveillance requirements of TS Table 4.3.5.1-1-1.b, and TS 4.3.5.2.

Further reviews of STPs were performed by the SSFA team and by System Engineering. In these reviews two additional missed overlap points were found. One of these was the LPCS/LPCI injection valves E21-F005 and E12-F042A permissive actuation instrumentation channels/circuitry for reactor vessel pressure - low. The other condition is the LSFT requirement to verify that Division II balance of plant (BOP) isolation valves (\*V\*) will isolate on a high drywell pressure signal.

The investigation of the LPCS/LPCI (\*BM\*) (\*BO\*) injection valve (\*V\*) permissive overlap condition revealed that STP-051-4247 was changed during revision from rev. 6 to rev. 7. This revision (Rev. 7) deleted the check of relay (\*RLY\*) E21A-K108 terminals M1-T1 and M4-T4. The reason for the change called out on the procedure change review form was to "Incorporate Administrative requirements, technical comments, and TCN-88-0094". This failed to indicate that the procedure intent had been changed. Also, the question "Does this revision change the intent of the procedure" was marked "NO". STP-051-4249 was also changed in the same manner and the same reason for change was given. No specific reason was given for deleting the checks of (\*RLY\*) E21A-K108.

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Analysis of the available documents indicates that the deletion of these steps was due to an oversight by the personnel preparing the new revision. This revision was not intended to change the purpose of the procedure. The steps were deleted in error. Further analysis shows that the review of the procedure by the independent reviewer should have detected the change in intent, but failed to do so.

Both STPs were corrected to include checks of (\*RLY\*) E21A-K108 at the appropriate points in the procedure via change notice (CN)-93-0098 and CN-93-0099. After incorporation of these CNs, STPs 051-4247 and 051-4249 were performed (partially) to demonstrate the operability of (\*RLY\*) E21A-K108. Both STPs were completed successfully. This would indicate that these contacts have been operable since the last correct performance of these STPs (STP-051-4247 last done correctly 3-28-89 and STP-051-4249 last done correctly on 10-8-87). Together with previous performances of STP-051-4247, 051-4249, and 309-0601, this satisfies the portion of the LSFT required by Technical Specification 4.3.3.2 relating to LPCS/LPCI (\*BM\*) (\*BO\*) injection valve (\*V\*) E21-F005 and E12-F042A permissive.

The logic system functional test (LSFT) requirement to verify that the Division II BOP isolation valves will isolate on a high drywell pressure signal is partially implemented by STP-508-4202. Note that this testing is required by Technical Specifications 4.3.1.2 and 4.3.2.2. The channel B logic circuit for high drywell pressure de-energizes relay C71A\*K4B, opening contacts M4-T4. If a similar signal is provided in channel C, the Division II BOP isolation valves will close.

Revision 9 to STP-508-4202 omitted testing contacts M4-T4 of relay C71A\*K4B. Therefore, the Division II BOP isolation function on high drywell pressure was not tested during the last outage.

A review of previous revisions of STP-508-4202 shows that the point in question was tested before, but it was eliminated from revision 9. The last correct performance of the LSFT was on October 1, 1990. The procedure writer used another STP for the same function in a different channel as an example and eliminated the relay from the test due to a different relay number used in this channel. In addition, the independent review was inadequate.

The STP was corrected to test relay C71A\*K4B at the appropriate points in the procedure via change notices CN-93-0122 and CN-93-0123. After incorporation of these CNs, a partial performance of the STP verified the operability of relay C71A\*K4B.



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## **ROOT CAUSE**

A change analysis was performed which revealed two causal factors. The primary causal factor was identified as inattention to detail while preparing previous revisions of the relevant STPs. A secondary causal factor was the inadequate review of the procedure by the independent reviewer.

A contributing factor to this event is that there is currently no cross reference matrix that provides association between STPs and their corresponding overlap point. This makes the current process for LSFT verification difficult during STP revisions.

Similarities were identified in LERs 91-020 and 92-014. LER 91-020 reported an event in which hydrogen igniters were declared inoperable due to discrepancies between the TS and an STP. The root cause included deficiencies in the procedure review and revision process. Limited similarity between LER 91-020 and LER 93-002 exists due to these past practices of procedure review and revision. As part of the corrective action for LER 91-020, GSU made significant changes to the procedure review/revision process as described below in the corrective action section. LER 92-014 reported an event in which LSFT overlap for ECCS logic system functional testing (LSFT) STPs did not have adequate overlap. In this event, a similar pattern emerged in that the LSFT had been properly performed during preoperational testing and later the STPs were revised such that proper overlap was no longer provided.

## **CORRECTIVE ACTIONS**

1. STP-051-4226 and STP-051-4227 have been revised such that they also check all the wiring and will meet the surveillance requirements of TS Table 4.3.5.1-1-1.b and TS 4.3.5.2. In addition, STP-051-4247, STP-051-4249, and STP-508-4202 have all been revised to address the LSFT deficiencies concerning the LPCS/LPCI 'A' injection valve permissive and the Division II BOP isolation function.
2. A review of all STPs which perform LSFTs which was initially scheduled to start in May 1993 has been started immediately. This review is to verify that the overlap exists between all STPs that perform a portion of an LSFT. It will also generate a cross reference matrix between the TS, STPs, and procedures for every LSFT overlap point. GSU has accelerated the review schedule for STPs which perform LSFTs. A supplement to this LER will be issued by May 31, 1993 to document additional LSFT overlap conditions discovered as a result of this review.

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3. As of August 31, 1992, per ADM-0003 "Development, Control, and Use of Procedures" paragraph 4.6, all persons performing an independent review of new revisions to STPs shall have completed classroom training and on-the-job training (OJT) on the proper method of 10CFR50.59 review. Also a detailed checklist is now required which includes items for verifying that Technical Specifications requirements are met. The required training includes the process to verify STP and USAR requirements. This procedure revision and personnel training was completed subsequent to the inadequate changes made to the referenced STPs and prior to the discovery of the LSFT inadequacies reported in this LER.

**SAFETY ASSESSMENT**

The TS surveillance requirements for LSFT overlap were not satisfied for STP-051-4226, STP-051-4227, STP-209-0601 (RCIC (\*BN\*) valve (\*V\*) isolation on reactor water level 8), and STPs 051-4247, 051-4249 (LPCS/LPCI 'A' (\*BM\*) (\*BO\*) injection valve (\*V\*) permissive), and STP-508-4202 (Division II BOP isolation valve (\*V\*) function on high drywell pressure). However, the portions of circuitry that were not tested have since been verified to be functioning properly. This provides confidence that the portions of the circuitry that did not receive the proper surveillance tests have in fact been operable since the expiration of the last surveillances.