UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

February 6, 2020

Mr. Steven Vercelli
Site Vice President
Entergy Operations, Inc.
5485 U.S. Highway 61N
St. Francisville, LA 70775

SUBJECT: RIVER BEND STATION – INTEGRATED INSPECTION REPORT 05000458/2019004

Dear Mr. Vercelli:

On December 31, 2019, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at River Bend Station. On January 7, 2020, the NRC inspectors discussed the results of this inspection with you and other members of your staff. The results of this inspection are documented in the enclosed report.

Two findings of very low safety significance (Green) are documented in this report. Two of these findings involved violations of NRC requirements. We are treating these violations as non-cited violations (NCVs) consistent with Section 2.3.2 of the Enforcement Policy.

If you contest the violations or the significance or severity of the violations documented in this inspection report, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region IV; the Director, Office of Enforcement; and the NRC Resident Inspector at River Bend Station.

If you disagree with a cross-cutting aspect assignment in this report, you should provide a response within 30 days of the date of this inspection report, with the basis for your disagreement, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001; with copies to the Regional Administrator, Region IV; and the NRC Resident Inspector at River Bend Station.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at http://www.nrc.gov/reading-rm/adams.html and at the NRC Public Document Room in accordance with Title 10 of the *Code of Federal Regulations* 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

/RA/

Jason W. Kozal, Chief
Reactor Projects Branch C
Division of Reactor Projects

Docket No. 05000458
License No. NPF-47

Enclosure:
As stated

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U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report

Docket Number:	05000458
License Number:	NPF-47
Report Number:	05000458/2019004
Enterprise Identifier:	I-2019-004-0009
Licensee:	Entergy Operations, Inc.
Facility:	River Bend Station
Location:	St. Francisville, Louisiana
Inspection Dates:	October 1, 2019 to December 31, 2019
Inspectors:	R. Kumana, Senior Resident Inspector B. Parks, Resident Inspector C. Osterholtz, Senior Operations Engineer
Approved By:	Jason W. Kozal, Chief Reactor Projects Branch C Division of Reactor Projects

Enclosure

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting an integrated inspection at River Bend Station, in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC's program for overseeing the safe operation of commercial nuclear power reactors. Refer to https://www.nrc.gov/reactors/operating/oversight.html for more information.

List of Findings and Violations

Failure to Maintain the Ability of a Fire Door to Close			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Mitigating Systems	Green NCV 05000458/2019004-01 Open/Closed	[P.3] - Resolution	71111.13
The inspectors identified a Green, non-cited violation of River Bend Station, Unit 1, Renewed Facility Operating License, Section C(10), with two examples, for failure to implement the fire protection program when the licensee degraded a fire barrier by obstructing a fire door without implementing adequate compensatory measures.			

Failure to Periodically Calibrate Radiation Monitoring Equipment			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Occupational Radiation Safety	Green NCV 05000458/2019004-02 Open/Closed	[H.3] - Change Management	71152
The inspectors identified a Green, non-cited violation of Technical Specification 5.4.1 for failure to periodically calibrate and maintain area, process, and effluent radiation monitors as required by 10 CFR Part 20, the Updated Final Safety Analysis Report, and the Offsite Dose Calculation Manual. Specifically, on or around October 2002, the licensee began changing the periodic calibration frequencies of 45 plant radiation monitors without adequate justification.			

Additional Tracking Items

Type	Issue Number	Title	Report Section	Status
LER	05000458/2019-001-00	Initiation of Standby Service Water due to Inadequate Monitoring of System Parameters During Maintenance Activities	71153	Closed

PLANT STATUS

River Bend Station began the inspection period at rated thermal power. On October 11, 2019, the station conducted a shutdown to address a low oil condition in reactor recirculation pump A. On October 15, 2019, after starting up the reactor and increasing power to 95 percent, the station conducted a downpower to approximately 75 percent to address a circulation water leak in a condenser. The unit was returned to rated thermal power on October 26, 2019. On November 21, 2019, the station conducted a downpower to approximately 83 percent to address an oil leak in main feed pump B. The unit was returned to rated thermal power on November 22, 2019. The unit remained at rated thermal power for the remainder of the inspection period.

INSPECTION SCOPES

Inspections were conducted using the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection unless otherwise noted. Currently approved IPs with their attached revision histories are located on the public website at http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter (IMC) 2515, "Light-Water Reactor Inspection Program - Operations Phase." The inspectors performed plant status activities described in IMC 2515, Appendix D, "Plant Status," and conducted routine reviews using IP 71152, "Problem Identification and Resolution." The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards.

REACTOR SAFETY

71111.01 - Adverse Weather Protection

Seasonal Extreme Weather Sample (IP Section 03.02) (1 Sample)

(1) The inspectors evaluated readiness for seasonal extreme weather conditions prior to the onset of seasonal cold temperatures on November 11, 2019, for the following systems:

Emergency diesel generators
FLEX

Impending Severe Weather Sample (IP Section 03.03) (1 Sample)

(1) The inspectors evaluated readiness for impending adverse weather conditions for a tornado warning on December 16, 2019.

71111.04Q - Equipment Alignment

Partial Walkdown Sample (IP Section 03.01) (3 Samples)

The inspectors evaluated system configurations during partial walkdowns of the following systems/trains:

(1) Division I reactor protection system during emergent work on Division II on November 8, 2019

(2) Penetration valve leakage control system on November 26, 2019

(3) High pressure core spray system on December 15, 2019

71111.05Q - Fire Protection

Quarterly Inspection (IP Section 03.01) (4 Samples)

The inspectors evaluated fire protection program implementation in the following selected areas:

(1) Control room, fire area C-25, on October 25, 2019
(2) Mezzanine area east, fire area AB-15/Z-4 on November 26, 2019
(3) High pressure core spray pump room, fire area AB-2/Z-1 on December 15, 2019
(4) Standby cooling tower pump A room, fire area PH-1/Z-1 on December 23, 2019

71111.07A - Heat Sink Performance

Annual Review (IP Section 02.01) (1 Sample)

The inspectors evaluated readiness and performance of:

(1) Residual heat removal heat exchanger A

71111.11A - Licensed Operator Requalification Program and Licensed Operator Performance

Requalification Examination Results (IP Section 03.03) (1 Sample)

(1) The inspectors reviewed and evaluated the licensed operator examination failure rates for the requalification annual operating exam administered on October 3, 2019.

71111.11Q - Licensed Operator Requalification Program and Licensed Operator Performance

Licensed Operator Performance in the Actual Plant/Main Control Room (IP Section 03.01) (1 Sample)

(1) The inspectors observed and evaluated licensed operator performance in the Control Room during reactor startup after a forced outage to conduct maintenance on a recirculation pump on October 13, 2019.

Licensed Operator Requalification Training/Examinations (IP Section 03.02) (1 Sample)

(1) The inspectors observed and evaluated a licensed operator simulator training session on December 11, 2019.

71111.12 - Maintenance Effectiveness

Routine Maintenance Effectiveness Inspection (IP Section 02.01) (1 Sample)

The inspectors evaluated the effectiveness of routine maintenance activities associated with the following equipment and/or safety significant functions:

(1) Functional failure review of safety vent valve system on December 17, 2019

Quality Control (IP Section 02.02) (1 Sample)

The inspectors evaluated maintenance and quality control activities associated with the following equipment performance activities:

(1) Review of commercial grade parts installed in hydrogen igniter 34B

71111.13 - Maintenance Risk Assessments and Emergent Work Control

Risk Assessment and Management Sample (IP Section 03.01) (5 Samples)

The inspectors evaluated the risk assessments for the following planned and emergent work activities:

(1) Yellow risk during maintenance on reactor core isolation cooling system on November 12, 2019

(2) Elevated risk during work on Division I control building chilled water system on October 10, 2019

(3) Yellow risk during planned maintenance on Division II containment unit coolers on November 18, 2019

(4) Yellow risk during planned maintenance on Division II and Division III residual heat removal system on November 20, 2019

(5) Yellow risk during relay replacement on Division III emergency diesel generator with Division II containment unit cooler inoperable for surveillance testing on December 18, 2019

71111.15 - Operability Determinations and Functionality Assessments

Operability Determination or Functionality Assessment (IP Section 02.02) (2 Samples)

The inspectors evaluated the following operability determinations and functionality assessments:

(1) Recirculation pump snubber after discovery of non-conforming condition involving improperly torqued turnbuckle nut on October 22, 2019 (CR-RBS-2019-06618)

(2) Automatic depressurization system after header supply pressure fell below minimum surveillance test pressure due to failure of nonsafety-related air compressors on November 15, 2019 (CR-RBS-2019-06836)

71111.19 - Post-Maintenance Testing

Post-Maintenance Test Sample (IP Section 03.01) (4 Samples)

The inspectors evaluated the following post-maintenance tests:

(1) Work Order 52896857 following reactor core isolation cooling system outage on December 9, 2019

(2) Work Order 52864029 following Division III diesel generator outage on December 16, 2019

(3) Work Order 00534360 following reactor protection system relay C71A-K14F on December 20, 2019

(4) Work Order 52807562 following maintenance on HVK-TV16A, temperature control valve to air handling unit AHU-1A, on December 26, 2019

71111.20 - Refueling and Other Outage Activities

Refueling/Other Outage Sample (IP Section 03.01) (1 Sample)

(1) The inspectors evaluated planned outage activities from October 11, 2019, to October 14, 2019. The planned outage occurred to address a low oil condition in reactor recirculation pump A.

71111.22 - Surveillance Testing

The inspectors evaluated the following surveillance tests:

Surveillance Tests (other) (IP Section 03.01) (1 Sample)

(1) STP-050-0700, Revision 310, “RCS Pressure/Temperature Limits Verification,” on October 13, 2019

Inservice Testing (IP Section 03.01) (1 Sample)

(1) STP-202-6606, Revision 5, “ADS/SRV Accumulator Check Valve Leak Rate Operability Test,” on November 14, 2019

FLEX Testing (IP Section 03.02) (1 Sample)

(1) MWO 400423-01, Revision 6/21/2011, “FLEX Equipment #FLX-P2 Diesel Driven Pump,” on November 12, 2019

71114.06 - Drill Evaluation

Select Emergency Preparedness Drills and/or Training for Observation (IP Section 03.01) (1 Sample)

The inspectors evaluated:

(1) Emergency preparedness training drill on October 8, 2019

OTHER ACTIVITIES – BASELINE

71151 - Performance Indicator Verification

The inspectors verified licensee performance indicators submittals listed below:

BI01: Reactor Coolant System (RCS) Specific Activity Sample (IP Section 02.10) (1 Sample)

(1) October 1, 2018 – September 30, 2019

BI02: RCS Leak Rate Sample (IP Section 02.11) (1 Sample)

(1) October 1, 2018 – September 30, 2019

PR01: Radiological Effluent Technical Specifications/Offsite Dose Calculation Manual Radiological Effluent Occurrences (RETS/ODCM) Radiological Effluent Occurrences Sample (IP Section 02.16) (1 Sample)

(1) October 1, 2018 – July 31, 2019

71152 - Problem Identification and Resolution

Semiannual Trend Review (IP Section 02.02) (1 Sample)

(1) The inspectors reviewed the licensee’s corrective action program for potential adverse trends in equipment reliability that might be indicative of a more significant safety issue.

Observation

In 2018, the station documented a trend of poor performance in the area of equipment reliability. Equipment reliability continued on an adverse trend

throughout 2019 with the station having to conduct multiple power transients and shutdowns to address equipment issues. Examples of equipment issues that affected the station included a leak in fifth point heater A, a malfunctioning of feedwater heater level control system A, a fault in recirculation pump transformer A, leakage in a condenser water box, increased drywell leakage due to leakage in a check valve in the residual heat removal system, a trip of feed pump B while at power, a trip of automatic depressurization system compressor B while compressor A was out of service, a small through-wall leak on standby liquid control piping discovered while the plant was offline for an outage, failures of nuclear instruments during startup, and an oil leak in recirculation pump A. Additionally, the station experienced multiple surveillance test failures on safety-related and risk-significant equipment, to include a failure of containment unit coolers and a control building chiller to automatically start during loss of offsite power and loss of coolant accident testing and failures of FLEX components to start properly during scheduled testing conducted by the equipment vendor. These issues have been documented in the corrective action program and the adverse trend remains open in the licensee's trending and performance review process.

Annual Follow-up of Selected Issues (IP Section 02.03) (1 Sample)

The inspectors reviewed the licensee's implementation of its corrective action program related to the following issue:

(1) Plant area, process, and effluent radiation monitors not being calibrated within the periodicity and frequency stated in the Updated Final Safety Analysis Report (UFSAR)

71153 – Follow-up of Events and Notices of Enforcement Discretion

Event Follow-up (IP Section 03.01) (1 Sample)

(1) The inspectors evaluated multiple failures of FLEX equipment and the licensee's response on October 31, 2019.

Event Report (IP Section 03.02) (1 Sample)

The inspectors evaluated the following licensee event report (LER):

(1) LER 05000458/2019-001-00, "Initiation of Standby Service Water due to Inadequate Monitoring of System Parameters During Maintenance Activities," on April 4, 2019 (ADAMS Accession: ML19154A071)

The inspectors reviewed the LER submittal and determined that the standby service water initiation, which occurred while the plant was shut down, resulted from a performance deficiency that was minor and that did not constitute a violation of a regulatory requirement. The licensee addressed the performance deficiency through their corrective action program.

INSPECTION RESULTS

<table>
<tr><td colspan="4">Failure to Maintain the Ability of a Fire Door to Close</td></tr>
<tr><td>Cornerstone</td><td>Significance</td><td>Cross-Cutting Aspect</td><td>Report Section</td></tr>
<tr><td>Mitigating Systems</td><td>Green
NCV 05000458/2019004-01
Open/Closed</td><td>[P.3] - Resolution</td><td>71111.13</td></tr>
<tr><td colspan="4">The inspectors identified a Green, non-cited violation of River Bend Station, Unit 1, Renewed Facility Operating License, Section C(10), with two examples, for failure to implement the fire protection program when the licensee degraded a fire barrier by obstructing a fire door without implementing adequate compensatory measures.</td></tr>
<tr><td colspan="4">Description: On October 10, 2019, during a plant tour, the inspectors observed that fire door CB98-31 was obstructed. This fire door is one of two normally open doors that separate the Division I and II control building chiller rooms. The licensee had taken Division I of the control building ventilation system out of service for maintenance and had protected Division II with a barrier to mitigate the online risk. The inspectors noticed that the protected equipment barrier, which consisted of a single belt across the door, had been placed on the inside edge of the door panel, thereby blocking the door closure path. The inspectors immediately contacted the licensee to notify them of the blocked fire door. The licensee removed the barrier and restored the door function.

On December 12, 2019, during a plant tour, the inspectors observed that fire door CB98-32 was obstructed. This fire door is the second of two normally open doors that separate the Division I and II control building chiller rooms. The licensee had staged maintenance equipment for a planned modification of chiller 1A and had wrapped a safety chain around the center hinge of the door, thereby blocking the door closure path. The inspector immediately contacted the licensee to notify them of the blocked fire door. The licensee removed the barrier and restored the door function.

Doors CB98-31 and CB98-32 are normally open, self-closing fire doors that separate fire area C-13W and C-13E, which respectively contain Division I and Division II control building ventilation system equipment. One train of ventilation is required for safe shutdown capability. The inspectors determined that the licensee's fire protection program requires self-closing fire doors to be cleared of obstruction, while the licensee's Technical Requirements Manual, Section 3.7.9.6, requires compensatory measures to be implemented when a fire barrier is degraded. The inspectors concluded that the licensee had degraded the fire barrier by obstructing its path and that compensatory measures would have been required to maintain the effectiveness of the fire protection program. The licensee had not implemented compensatory measures for the doors.

The inspectors noted that a similar violation had been documented in Inspection Report 2019003 for door CB98-31. The licensee had developed corrective actions focused on communication to operators about the importance of ensuring the fire doors were not obstructed; however, the licensee had not extended the corrective action to maintenance personnel and had not assured that all personnel understood the proper placement of barriers.

Corrective Actions: The licensee removed the obstructions from the fire door paths.
Corrective Action References: CR-RBS-2019-06546 and CR-RBS-2019-07844</td></tr>
</table>

Performance Assessment:

Performance Deficiency: Degrading a required fire barrier without implementing compensatory measures is a performance deficiency.

Screening: The inspectors determined the performance deficiency was more than minor because it was associated with the protection against external factors attribute of the Mitigating Systems Cornerstone and adversely affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the finding represented a loss of control of fire barriers required to ensure the availability of required safe shutdown equipment.

Significance: The inspectors assessed the significance of the finding using Appendix F, "Fire Protection and Post - Fire Safe Shutdown SDP." The inspectors determined the finding was associated with Fire Confinement and was assigned a "High" degradation rating. The inspectors used Step 1.4.4 to determine that the finding was of very low safety significance (Green) because there was an adequate automatic suppression system on either side of the fire confinement element.

Cross-Cutting Aspect: P.3 - Resolution: The organization takes effective corrective actions to address issues in a timely manner commensurate with their safety significance. Specifically, the licensee failed to ensure that the corrective actions to address the issue were effective.

Enforcement:

Violation: The River Bend Station, Unit 1, Renewed Facility Operating License, Section C(10) and Attachment 4, requires that the licensee implement and maintain in effect all provisions of the approved fire protection program. The approved fire protection plan requires that self-closing fire door doorways be kept free of obstructions. Contrary to the above, on October 10, 2019, and on December 12, 2019, the licensee failed to maintain doors CB98-31 and CB98-32 free of obstructions.

Enforcement Action: This violation is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.

Failure to Periodically Calibrate Radiation Monitoring Equipment			
Cornerstone	Significance	Cross-Cutting Aspect	Report Section
Occupational Radiation Safety	Green NCV 05000458/2019004-02 Open/Closed	[H.3] - Change Management	71152

The inspectors identified a Green, non-cited violation of Technical Specification 5.4.1 for failure to periodically calibrate and maintain area, process, and effluent radiation monitors as required by 10 CFR Part 20, UFSAR, and the Offsite Dose Calculation Manual (OCDM). Specifically, on or around October 2002, the licensee began changing the periodic calibration frequencies of 45 plant radiation monitors without adequate justification.

Description: The inspectors reviewed the licensee's calibration records and methods for area, process, and effluent radiation monitors credited in the UFSAR and ODCM. The inspectors noted that the calibration frequency and periodicity of some radiation monitors did not seem consistent with what was stated in the UFSAR to meet the requirements of

10 CFR 20.1501(c). Chapter 11.5.2.3 of the licensee's UFSAR states that continuous radiation monitors (i.e., process effluent radiation monitors) are to be calibrated periodically. Chapter 12.3.4.1 of the licensee's UFSAR states that continuous radiation monitors (i.e., area radiation monitors) are to be calibrated annually or at each refueling, which the licensee performs every 2 years.

The inspectors specifically searched for written procedures for maintenance and calibration of the continuous liquid process radiation monitoring equipment for the cooling tower blowdown line, RMS-RE108. The licensee informed the inspectors that RMS-RE108 had not been calibrated since 2008. RMS-RE108 had been removed from the Technical Requirements Manual. Preventive maintenance Procedure RSP-0008 and maintenance calibration Procedure MCP-4205, "DRMS-Liquid Radiation Monitor Calibration," were utilized to maintain RMS-RE108 operational, with a calibration frequency of 4 years. The inspectors determined this procedure was retired by the licensee in 2013. During an onsite tour, the inspectors found that RMS-RE108 was turned off and out of service. The inspectors did not observe any tagging or notifications indicating the operational status of RMS-RE108. Due to NRC's concern with this issue, the licensee initiated a change request to reinstate the preventive maintenance task for RMS-RE108.

During the onsite inspection, the inspectors asked the licensee to identify other process effluent radiation monitors and area radiation monitors that have not been maintained as calibrated at least at a 2-year periodicity. The licensee initially identified another 32 other radiation monitors that had not been calibrated at a 2-year periodicity. During a follow-up discussion with the licensee, the inspector asked about the calibration periodicity of all radiation monitors described in Chapters 11 and 12 of the UFSAR. On October 22, 2019, the licensee revealed that 45 other radiation monitors (11 process effluent radiation monitors and 34 area radiation monitors) had not been calibrated at a 2-year periodicity. The inspectors questioned the licensee's basis for changing the maintenance (i.e., calibration) from an initial frequency of 18 months (the original refueling cycle) to currently 40 years or "as required." The inspectors were informed that the basis for changing the frequency of the preventive maintenance to 40 years was due to the daily check source test which was an automatic function performed daily by the radiation monitor system (RM-80). However, the inspectors concluded that the licensee had not maintained appropriate margins and defense-in-depth for the operation of all plant radiation monitors in accordance with the UFSAR and regulatory requirements since at least October 2002. The inspectors further determined that the radiation monitor calibration periodicity changes were authorized by the licensee without involvement of the radiation protection and chemistry organizations.

Corrective Actions: The licensee entered this issue in the corrective action program to re-evaluate and document an adequate basis for the calibration frequency of the affected radiation monitors and develop an action plan for calibration of the radiation monitors.

Corrective Action References: Condition Reports CR-RBS-2019-04715, CR-RBS-2019-05199, and CR-RBS-2019-07493

Performance Assessment:

Performance Deficiency: The failure to properly calibrate radiation monitors as required by established procedures and the UFSAR is a performance deficiency.

Screening: The inspectors determined the performance deficiency was more than minor because it was associated with the plant facilities/equipment and instrumentation attribute of

the Occupational Radiation Safety cornerstone and adversely affected the cornerstone objective to ensure the adequate protection of the worker health and safety from exposure to radiation from radioactive material during routine civilian nuclear reactor operation. Specifically, the failure to properly calibrate radiation monitors impacts the ability to mitigate radiation dose to workers and the public from radioactive material during routine civilian nuclear reactor operation. Consequently, the failure to calibrate or verify the calibration of these plant radiation monitors impacts the licensee's ability to ensure accurate radiation measurements.

Significance: The inspectors assessed the significance of the finding using Appendix C, "Occupational Radiation Safety SDP." The inspectors determined the finding to be of very low safety significance (Green) because it was not an as low as reasonably achievable (ALARA) issue, there was no overexposure or substantial potential for overexposure, and the licensee's ability to assess dose was not compromised.

Cross-Cutting Aspect: H.3 - Change Management: Leaders use a systematic process for evaluating and implementing change so that nuclear safety remains the overriding priority. The finding had a cross-cutting aspect in the area of human performance associated with change management because the licensee's change process did not identify that the instrument calibration requirements of 10 CFR Part 20 and the UFSAR were applicable to all plant area, process, and effluent radiation monitors. Specifically, the change did not involve an adequate systematic process to include members of the radiation protection and chemistry organizations to ensure compliance with 10 CFR Part 20, the UFSAR, and the ODCM was maintained. Although some of these changes were made effective in 2002, there were recent opportunities for the licensee to evaluate the changes and/or ensure the affected radiation monitors were appropriately calibrated due to condition reports that were written and reviewed relative to the performance of these radiation monitors.

Enforcement:

Violation: Technical Specification 5.4.1, "Procedures," requires the licensee to establish, implement, and maintain the applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, 8.b (aa), for area, portable, and airborne radiation monitor calibrations and Appendix 8.b (bb) for process radiation monitor calibrations.

Contrary to the above, from October 10, 2002, through October 22, 2019, the licensee failed to maintain and implement written procedures for 45 process, effluent, and area radiation monitors calibrated in accordance with the UFSAR. Specifically, the licensee had not maintained 45 process, effluent, and area radiation monitors calibrated periodically, annually, or per the 2-year refueling frequency as stated in the UFSAR.

Enforcement Action: This violation is being treated as a non-cited violation, consistent with Section 2.3.2 of the Enforcement Policy.

EXIT MEETINGS AND DEBRIEFS

The inspectors verified no proprietary information was retained or documented in this report.

- On January 7, 2020, the inspectors presented the integrated inspection results to Mr. S. Vercelli, Site Vice President, and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71111.12	Work Orders	WO-	00514723	
71111.13	Corrective Action Documents	CR-RBS-	2019-05128, 2019-06546, 2019-07844	
71111.13	Procedures	CB-098-122	Water Chiller Equipment 1A Room Fire Area C-13W	3
71111.13	Procedures	CB-098-123	Water Chiller Equipment 1B Room Fire Area C-13E	3
71153	Corrective Action Documents	CR-RBS-	2019-01976	
71153	Procedures	EN-OP-0120	Operator Fundamentals Program	2