



Entergy Operations, Inc.
River Bend Station
PO Box 220
St Francisville, LA 70775

August 5, 1994

U.S. Nuclear Regulatory Commission
Document Control Desk
M/S P1-37
Washington, D.C. 20555

Subject: River Bend Station - Unit 1
Docket No. 50-458
License No. NPF-47
Licensee Event Report 50-458/94-020-00
File Nos.: G9.5, G9.25.1.3

RBG-40784

Gentlemen:

In accordance with 10CFR50.73, enclosed is the subject report.

Very truly yours,

James J. Fisicaro
Director - Nuclear Safety

JJF/MKB/kvm
enclosure

100070

9408150056 940805
PDR ADOCK 05000458
S PDR

100070

Licensee Event Report 94-020-00
August 5, 1994
RBG-40784
Page 2 of 2

cc: U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

NRC Sr. Resident Inspector
P.O. Box 1051
St. Francisville, LA 70775

INPO Records Center
700 Galleria Parkway
Atlanta, GA 30339-3064

Mr. C.R. Oberg
Public Utility Commission of Texas
7800 Shoal Creek Blvd., Suite 400 North
Austin, TX 78757

Louisiana Department of Environmental Quality
Radiation Protection Division
P.O. Box 82135
Baton Rouge, LA 70884-2135
ATTN: Administrator

NRC FORM 366 (5-92)		U.S. NUCLEAR REGULATORY COMMISSION			APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95					
LICENSEE EVENT REPORT (LER)								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		
FACILITY NAME (1) River Bend Station								DOCKET NUMBER (2) 05000458		PAGE (3) 1 of 4
TITLE (4) TS Surveillance Not Properly Implemented For Service Water System Because of Inadequate Design Review										
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
07	07	94	94	020	00	08	05	94	N/A	05000
			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more (11))							
OPERATING MODE (9)		1	20.402(b)		20.405(c)		50.73(a)(2)(iv)		73.71(b)	
POWER LEVEL (10)		030	20.405(a)(1)(i)		50.36(c)(1)		50.73(a)(2)(v)		73.71(c)	
			20.405(a)(1)(ii)		50.36(c)(2)		50.73(a)(2)(vii)		OTHER	
			20.405(a)(1)(iii)		x	50.73(a)(2)(i)		50.73(a)(2)(viii)(A)		(Specify in abstract below and in text, NRC Form 366A)
			20.405(a)(1)(iv)			50.73(a)(2)(ii)		50.73(a)(2)(viii)(B)		
			20.405(a)(1)(v)			50.73(a)(2)(iii)		50.73(a)(2)(x)		
LICENSEE CONTACT FOR THIS LER (12)										
NAME T.W. Gates, Supervisor - Nuclear Licensing						TELEPHONE NUMBER (Include Area Code) 504-381-4866				
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)										
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	
SUPPLEMENTAL REPORT EXPECTED (14)										
YES (If yes, complete EXPECTED SUBMISSION DATE)				X	NO				EXPECTED SUBMISSION DATE (15)	
ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16) On July 7, 1994, with the plant in Operational Condition 1 (Power Operation), a deficiency in STP 256-0201, "SWP Valve Lineup Verification," was identified as part of the ongoing Technical Specification Review Project. This deficiency occurred due to a 1986 Modification Request (MR) which failed to document Technical Specification 4.7.1.1.a surveillance requirements associated with certain locked valves. The root cause of this event was an inadequate review of the Technical Specification surveillance requirements by the individuals responsible for developing the MR. Immediate actions were taken to verify the position of these valves and to add them to the STP. Corrective actions to prevent recurrence include enhancement of engineering procedure ENG-3-006, "River Bend Station Design and Modification Request Control Plan," and enhancement of the administrative process for controlling changes to locked valves. Recent LERs involving STP deficiencies include LERs 92-014, 93-002, 93-005, and 93-012. Evidence exists that the valves were maintained in their safety position and therefore, this condition was of no safety significance.										

NRC FORM 366A (5-92)	U.S. NUCLEAR REGULATORY COMMISSION	APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95	
<p align="center">LICENSEE EVENT REPORT (LER) TEXT CONTINUATION</p>		<p>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 (MNB 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.</p>	
		FACILITY NAME (1) River Bend Station	DOCKET NUMBER (2) 05000-458

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

REPORTED CONDITION

On July 7, 1994, with the plant in Operational Condition 1 (Power Operation), a deficiency in STP-256-0201, "SWP Valve Lineup Verification," was identified. This deficiency was identified as part of the ongoing Technical Specification Review Project. Specifically, Surveillance Requirement 4.7.1.1.a requires position verification of each valve in the Standby Service Water (SWP) System flow path that is not locked, sealed or otherwise secured in position. Several valves within the scope of this surveillance requirement were not included in the implementing STP referenced above. Since an acceptable surveillance was not being performed for all applicable valves, this condition constitutes plant operation prohibited by the Technical Specifications. This report is submitted pursuant to 10CFR50.73(a)(2)(i)(b).

INVESTIGATION

The Technical Specification Review Project identified four valves that were not being surveilled as required to satisfy Surveillance Requirement 4.7.1.1.a. These four valves were originally setup with locking devices. A review of the initial revision of STP 256-0201 revealed that these valves were originally listed in the STP and that they were identified therein as LOCKED OPEN. These valves were removed from STP-256-0201, Revision 1, because they were locked open and thus their position did not need to be verified for the surveillance requirement.

In 1986 River Bend Station (RBS) recognized the need to better control the population of locked valves and took steps to minimize the number of these valves. MR 86-1568 was initiated to define the scope of valves required to be locked because of design requirements. After these requirements were established, the MR deleted the "lock required" annotation from selected valves on the plant's design drawings. Provisions were included in this process to retain the "lock required" annotation for those valves that were locked for administrative purposes; however, valves that could be locked to satisfy Technical Specification surveillance requirements were not specifically identified. Consequently, an appropriate administrative process for controlling this category of "locked" valves was not developed.

ROOT CAUSE

The root cause was failure to recognize the surveillance requirements associated with locked valves due to an inadequate review of the Technical Specifications by the individuals responsible for developing and implementing the MR. As a result, the surveillance requirements for these valves were not properly documented.

NRC FORM 366A (5-92)	U.S. NUCLEAR REGULATORY COMMISSION	APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95		
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.		
				FACILITY NAME (1)
River Bend Station		05000-458	94-020	3 OF 4

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

Recent LERs involving STP deficiencies with respect to Technical Specifications include LERs 92-014, 93-002, 93-005 and 93-012. The root causes associated with all of these events involved ineffective development of the STPs. In general, limited scope corrective actions were taken to correct the deficiencies in the affected STPs up to LER 93-012. A significant programmatic corrective action was initiated as described in LER 93-012. This action resulted in an in-depth review of all STPs to verify that the Technical Specification requirements were being properly implemented. While the root cause of LER 94-20 is different from these previous events, the corrective action taken as a result of LER 93-012 has proven effective in enabling RBS personnel to identify and correct problems in the STPs.

CORRECTIVE ACTION

Immediate actions to verify the operability of the flow paths containing these valves were taken by the operators on shift at the time of discovery. Additionally, a Change Notice to add these valves to STP-256-0201 was generated on the day of discovery. This will ensure that the surveillance for these valves will be performed on the monthly frequency required by the Technical Specifications.

The Technical Specification Review Project will continue the detailed review of the plant's STPs to ensure that these procedures are adequate to fully implement the requirements of the Technical Specifications. Should a similar reportable deficiency be identified, it will be described in a supplement to this LER.

Corrective actions to prevent recurrence include a revision of ENG-3-006, "River Bend Station Design and Modification Request Control Plan," to better define the cognizant engineer's responsibility to identify Technical Specification requirements during the development of a MR package. The engineers responsible for developing MRs will be briefed on this event and trained on the revisions to this procedure. This will be completed by October 31, 1994.

The administrative process for controlling locked valves will be enhanced. Operation Section Procedure OSP-0014, "Control of Locked Valves and Devices," will be revised to more explicitly identify references which should be reviewed for impact before any lock is removed from the computerized "Locked/Sealed Valve List." This will be completed by October 15, 1994.

NRC FORM 366A (5-92)	U.S. NUCLEAR REGULATORY COMMISSION	APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95		
LICENSEE EVENT REPORT (LER) TEXT CONTINUATION		ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNB 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		
FACILITY NAME (1) River Bend Station		DOCKET NUMBER (2) 05000-458	LER NUMBER (6) 94-020	PAGE (3) 4 OF 4

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

SAFETY ASSESSMENT

The valves involved in this MR are located in the service water supply and return header piping for the drywell unit coolers. Since the implementation of the MR, a system operating procedure (SOP) has been in effect which required position verification of these valves during plant startup and shutdown. Additionally, some evidence that the subject valves were maintained in the open position during operating conditions is provided by the fact that the drywell unit coolers have continued to perform their function. The correct position of these valves was positively verified at the time this deficiency was discovered.

Based on the above evidence, it is reasonable to assume that the valves were maintained in their safety position and that this condition was of no safety significance.