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JAMES J. FISICARO
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October 13, 1994

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

SUBJECT: River Bend Station - Unit 1
Docket No. 50-458
License No. NPF-47
Licensee Event Report 50-458/94-026-00
File Nos. G9.5, G9.25.1.3

RBG-40959
RBF1-94-0076

Gentlemen:

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

Sincerely,

JJF/kvm
Enclosure

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

NRC Sr. Resident Inspector
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St. Francisville, LA 70775

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

Mr. C.R. Oberg
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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 (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		PAGE (3) 1 of 4		
TITLE (4) INADEQUATE SURVEILLANCE TEST OF ACCESS GATE LIMIT SWITCHES DUE TO DEFICIENCIES IN PROCEDURES										
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
09	15	94	94	026	00	10	13	94	N/A	05000
									FACILITY NAME	DOCKET NUMBER
									N/A	05000
OPERATING MODE (9)		4		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more (11))						
				20.402(b)		20.405(c)		50.73(a)(2)(iv)		73.71(b)
POWER LEVEL (10)		000		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 NRC		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC
SUPPLEMENTAL REPORT EXPECTED (14)						EXPECTED		MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)		X		NO		SUBMISSION DATE (15)				
ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)										
<p>On September 15, 1994, with the plant in Operational Condition 4 (Cold Shutdown), a deficiency in STP 055-0101, "IFTS Pre-Op and Weekly Interlock Operability Test," was identified as part of the ongoing Technical Specification Review Project. This deficiency resulted in the failure to test gate position limit switches associated with the Containment Isolation Valve Room Gate, the Annulus Inclined Fuel Transfer System (IFTS) Support Room Gate, and the Fuel Building Mid-Support Room Gate interlock system as required to satisfy Technical Specifications 4.9.12.3 and 4.9.12.4.</p> <p>Technical Specifications 4.9.12.3 and 4.9.12.4 require verification to ensure operability of the access interlocks which prevent operation of the IFTS while personnel are in the associated rooms. Testing requirements for the access gate limit switches were omitted from the surveillance test procedure (STP) during initial development. Other portions of the interlock system were tested.</p> <p>The root cause of this occurrence was inadequate oversight of the STP development, review and revision process in that the gate position limit switches for the Containment Isolation Valve Room Gate, the Annulus IFTS Support Room Gate, and the Fuel Building Mid-Support Room Gate were not included during the initial procedure development or subsequent review and revisions. Investigation indicated that this condition had existed prior to plant start-up and was not identified during subsequent reviews and revisions of this procedure. Corrective actions to incorporate the applicable test requirements for the limit switches have been completed and test results indicate the limit switches were operable.</p>										

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>				<small>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</small>	
FACILITY NAME (1) River Bend Station				DOCKET NUMBER (2) 05000-458	PAGE (3) 2 OF 4

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

REPORTED CONDITION

On September 15, 1994, with the plant in Operational Condition 4 (Cold Shutdown), a deficiency in STP-055-0101, "IFTS Pre-Op and Weekly Interlock Operability Test," was identified as part of the ongoing Technical Specification Review Project. This deficiency resulted in the failure to test gate position limit switches (*33*) associated with the Containment Isolation Valve Room Gate, the Annulus Inclined Fuel Transfer System (IFTS) (*DF*) Support Room Gate, and the Fuel Building Mid-Support Room Gate interlock system as required to satisfy Technical Specification 4.9.12.3 and 4.9.12.4.

Since an acceptable surveillance was not being performed for the access gate limit switches, this condition constitutes plant operation prohibited by the Technical Specifications. This report is submitted pursuant to 10CFR50.73(a)(2)(i)(B) on the basis that the interlocks were required operable but never tested.

INVESTIGATION

The IFTS interlocks are provided to indicate whenever personnel have accessed radiation hazardous areas along the transfer tube route and interrupt IFTS control power preventing its operation. Technical Specification 4.9.12.3 requires that within 4 hours prior to operation of IFTS and at least once per 7 days thereafter, verify the access interlocks are operable for the Containment Isolation Valve Room Gate. Technical Specification 4.9.12.4 requires that within 4 hours prior to installation of the floor plugs which provide access into the area, verify operability of the interlocks for the Fuel Building Mid-Support Room and Shield Building Annulus IFTS Support Room Gates. Failure to test these switches results in system inoperability in accordance with Technical Specification 4.9.12.3 and 4.9.12.4.

The access interlocks consist of key lock switches and gate position limit switches. The interlocks are located in the IFTS main Panel, in the main control room panel, and in a junction box adjacent to the access gate at each of the three rooms. There are two gate position limit switches, located inside the locking mechanism box, associated with each gate. These switches prevent the operation of IFTS when the gate locking bolt is unlocked and also prevent the IFTS running interlock to reset when the gate is not fully closed. The gate position limit switches are:

- | | | |
|----|---------------------------------------|----------------------------|
| 1) | Containment Isolation Valve Room Gate | (33A-1SFTN26, 33B-1SFTN26) |
| 2) | Annulus IFTS Support Room Gate | (33C-1SFTN26, 33D-1SFTN26) |
| 3) | Fuel Building Mid-Support Room Gate | (33E-1SFTN26, 33F-1SFTN26) |

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<p align="center">LICENSEE EVENT REPORT (LER) TEXT CONTINUATION</p>		<small>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</small>	
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The review of STP-055-0101 concluded that gate position limit switches 33B-1SFTN26 and 33D-1SFTN26 were included in the surveillance. The test requirements were not specific to these limit switches and it was not the intent of the procedure to test these switches. However, as a result of the test, their operability could be confirmed. The remaining switches were not included in the test.

The gate position limit switches for the Containment Isolation Valve Room Gate, the Annulus IFTS Support Room Gate, and the Fuel Building Mid-Support Room Gate were not included during the initial procedure development prior to start-up or subsequent review and revisions. Investigation indicated that this condition had existed since development of the test procedure and was not identified during subsequent reviews and revisions of this procedure. Corrective actions to incorporate the applicable test requirements for the complete interlock system have been completed and the limit switches have been determined to be operable.

ROOT CAUSE

The root cause of this occurrence was inadequate oversight of the STP development, review and revision process in that the gate position limit switches for the Containment Isolation Valve Room Gate, the Annulus IFTS Support Room Gate, and the Fuel Building Mid-Support Room Gate were not included during the initial procedure development or subsequent review and revisions.

CORRECTIVE ACTION

Upon discovery of the test deficiency, Operations initiated LCO 94-0547 to prevent operation of IFTS moving irradiated fuel until proper testing was conducted. Procedure change notice CN 94-1816 was initiated on September 15, 1994 to incorporate specific testing requirements for the Containment Isolation Valve Room Gate, the Annulus IFTS Support Room Gate, and the Fuel Building Mid-Support Room Gate position limit switches. The test was subsequently performed confirming operability of the subject limit switches.

LERs involving STP deficiencies with respect to Technical Specifications include LERs 92-014, 93-002, 93-005, 93-012, 94-020, and 94-021. The root causes associated with 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. At that point an in-depth review of all STPs was initiated to verify that the Technical Specification requirements were being properly implemented. The corrective action taken

NRC FORM 366A (5-82)	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>		
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following LER 93-012 has proven effective in enabling River Bend Station personnel to identify and correct problems in STPs. The ongoing Technical Specification Review Project which identified this issue will continue the detailed review of River Bend Surveillance Test Procedures to ensure that these procedures are adequate to fully implement the requirements of the Technical Specifications.

In addition to the Technical Specification Review Project, existing corrective actions have also been implemented at River Bend Station to address the adequacy of site procedures including the adequacy of STPs. Interim actions have been implemented as part of the Procedure Upgrade Project (PUP) as described in a July 6, 1994 letter to the NRC (RBG-40699). This plan includes the formation of an interim procedures group and an assessment to determine which procedures require near-term improvement using reportable events, among other criteria, as inputs.

These interim actions are a precursor to improvement initiatives included in the Long Term Performance Improvement Plan. These initiatives include improving procedure quality and usability, improving administrative controls, streamlining and enhancing the procedure maintenance and change process, and establishing effective information management systems.

SAFETY ASSESSMENT

The Technical Specification surveillance requirements for the operability test of the Containment Isolation Valve Room Gate, the Annulus IFTS Support Room Gate, and the Fuel Building Mid-Support Room Gate interlock function were not satisfied as a result of omitting the gate position limit switches. However, the limit switches were verified to be functioning properly during the recent performance of STP-055-0101. This provides assurance that the interlocks have been operable and capable of performing their design basis function.

Note: Energy Industry Identification System (EIIIS) Codes are identified in the text as (*XX*).