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JAMES J. FISICARO

Director
Nuclear Safety

December 19, 1994

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

Subject: River Bend Station - Unit 1
Docket No. 50-458
License No. NPF-47
Licensee Event Report 50-458/94-029-00
File No.: G9.5, G9.25.1.3

RBG-41106
RBF1-94-0138

Gentlemen:

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

Sincerely,

JJF/BMB/kvm
enclosure

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cc: U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
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Radiation Protection Division
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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) 05000-458		PAGE (3) 1 of 4			
TITLE (4) MISSSED SURVEILLANCE DUE TO INADEQUATE REVIEW OF TECH SPEC AMENDMENT										
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
11	18	94	94	029	00	12	19	94	N/A	05000
OPERATING MODE (9)			1			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more (11))				
POWER LEVEL (10)			100			20.402(b)			20.405(c)	
						20.405(a)(1)(i)			50.73(a)(2)(iv)	
						20.405(a)(1)(ii)			50.73(a)(2)(v)	
						20.405(a)(1)(iii)			50.73(a)(2)(vi)	
						20.405(a)(1)(iv)			50.73(a)(2)(vii)(A)	
						20.405(a)(1)(v)			50.73(a)(2)(viii)(B)	
						20.405(a)(1)(v)			50.73(a)(2)(ix)	
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	REPORTABLE TO NPRDS
SUPPLEMENTAL REPORT EXPECTED (14)					EXPECTED		MONTH		DAY	
YES (If yes, complete EXPECTED SUBMISSION DATE)					X NO		SUBMISSION DATE (15)		YEAR	
ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16) On November 18, 1994, at 0830 hours with the plant in Operational Condition 1 (Power Operation), it was discovered that Technical Specification (TS) surveillance requirements imposed by a recent TS amendment had not been performed within the specified implementation period. This TS amendment added a requirement to calibrate the reactor pressure-high trip units on a quarterly basis. The affected equipment was immediately tested and determined to be operable. The root cause of this event was a personnel error due to an inadequate review during the implementation of Amendment 74 to the TS. Immediate corrective actions to incorporate the applicable test requirements for the trip units have been completed. Long-term enhancements to the TS amendment process have been identified. While several LERs have been submitted regarding STP deficiencies, no similar deficiency associated with the implementation of a TS amendment has been identified. This event was of no safety significance.										

NRC FORM 366A (5-92)	U.S. NUCLEAR REGULATORY COMMISSION	APPROVED BY OMB NO. 3150-0104 EXPIRES 6/31/95		
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				FACILITY NAME (1)
River Bend Station		05000-458	94-029-00	2 OF 4

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

Reported Condition

On November 18, 1994, at 0830 hours with the plant in Operational Condition 1 (Power Operation), it was discovered that Technical Specification (TS) surveillance requirements imposed by a recent TS amendment had not been performed within the specified implementation period. The failure to perform surveillance testing as required by the Technical Specifications is reportable in accordance with 10CFR50.73(a)(2)(i)(B).

Investigation

The high pressure recirculation pump (*AD-P*) trip is provided to initiate a recirculation pump trip (adding negative reactivity) in response to an ATWS event. The system consists of two independent trip systems (*PS*) with two channels of reactor pressure high and two channels of reactor vessel low water level in each trip system. The trip system is a two out of two logic for each function. The outputs are combined so that a trip of either system will trip both recirculation pumps. No credit for the ATWS recirculation pump trips is taken in the safety analysis.

Through Amendment 73, RBS TS 4.3.4.1 required a monthly channel functional test and an 18 month (each refueling outage) channel calibration for the ATWS recirculation pump trip. The trip units were required to be calibrated, along with the other adjustable components in the channel, as part of the 18 month surveillance. Although not required by the TS, four RBS STPs (one for each of the four channels) calibrated the trip unit every month as part of the channel functional test.

In March, 1994, the four original procedures which performed channel functional and calibration testing of the ATWS recirculation pump reactor pressure high trip were revised by separating the 18 month surveillance activities from the monthly activities. Four new procedures were created to address the monthly surveillance activities. The four new procedures continued to require calibration of the trip unit on a monthly periodicity in excess of TS requirements.

During July 1994, TS 4.3.4.1 was reviewed to determine if the required surveillances were being properly implemented. This review established that a monthly calibration of the trip unit was not required by the existing TS requirements, and the procedures were subsequently revised to delete the monthly calibration.

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Amendment 74 to RBS TS was approved on August 2, 1994 with the stipulation that the amendment be implemented within 60 days of approval. The major effect of the amendment was to extend the allowable out-of-service times (AOTs) and channel functional surveillance test intervals. However, the amendment also imposed more restrictive surveillance periods for the Reactor Protection System (*JE*) manual scram function and changed the periodicity of the ATWS recirculation pump trip calibration from 18 months to 92 days.

When the amendment was received, plant procedures were reviewed to identify any changes necessary to implement the amendment. This review identified the more restrictive surveillance requirement for the manual scram but failed to identify the change to the high reactor vessel ATWS recirculation pump trip calibration surveillance interval from once per 18 months to once per 92 days.

With the exception of the ATWS recirculation pump trip issue, the necessary changes were implemented beginning August 25. Since the ATWS high pressure instrumentation calibration surveillance procedure had not been revised, the surveillance interval expired for three of the four channels by November 4, 1994. The required calibration was performed successfully on the three identified channels on November 18, 1994 when the condition was identified. During the investigation of this issue, the surveillance procedure for the fourth channel was found to have a change notice which removed the calibration requirement causing the channel to exceed the required surveillance period on November 23, 1994. This surveillance was successfully performed on December 14, 1994.

Root Cause

The root cause of this condition was personnel error in that the new requirement for the performance of a quarterly calibration surveillance was not identified as a more restrictive requirement. This error occurred during the implementation review for TS amendment 74. It should be noted that the normal procedure review process identified this problem while the procedure was under review for another issue. A contributing factor was the assumption that the TS amendment primarily implemented less restrictive surveillance frequencies. While it was clearly understood that change to manual scram test was more restrictive, a perception existed that the balance of the changes were relaxations and could be implemented on an as needed basis.

Several LERs involving STP deficiencies with respect to Technical Specifications have been previously submitted and include LERs 92-014, 93-002, 93-005, 93-012, 94-020, 94-021 and 94-026. However, the deficiencies with these LERs have not been attributed to inadequate reviews during the implementation of a TS amendment. Therefore, the root cause and corrective actions identified in these LERs are not germane to the deficiency described in this LER.

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Corrective Action

Procedure revisions were developed and the required testing performed upon discovery of the test deficiency. These tests confirmed the operability of the subject limit switches.

EOI management has recognized the need to improve personnel accountability. The individual involved has been made aware of his responsibility during the review of this event. Also several programs are being implemented to reduce personnel error. These programmatic actions are described in RBS's Long Term Performance Improvement Plan.

Specific process improvements will be evaluated to enhance the RBS process for developing and implementing TS changes. These corrective actions will further aid in the identification of the specific implementation requirements for a requested change to the license. The procedure review requirements will be changed using human factor criteria to clarify the review requirements. The preparer of a procedure, or revision, will be provided additional guidance on identifying the scope of preparation or revision. The corrective actions will also further ensure the needed changes are identified and confirmed prior to implementing an amendment for use. The corrective actions will be complete by February 28, 1995.

Safety Assessment

The Technical Specification surveillance requirements for the operability test of the trip units were successfully performed on November 18, 1994. This provides assurance that the trip units have been operable and capable of performing their design basis function in the interim.

The STP's performed prior to 8/2/94 checked the instrument on a monthly period which is a more frequent basis than previously required. During these past surveillances, these devices have exhibited very stable setpoint characteristics and have needed re-calibration rarely. Also no credit for the ATWS recirculation pump trips is taken in the safety analysis.

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