



ENTERGY

Entergy Operations, Inc.
River Bend Station
5485 U.S. Highway 61
P.O. Box 220
St. Francisville, LA 70775
Tel 504 336 6225
Fax 504 635 5068

James J. Fisicaro
Director
Nuclear Safety

May 19, 1995

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
License Amendment Request (LAR) 94-04, Leakage Control Systems
(TAC M-88832)

File Nos.: G9.5, G9.42

Reference: RBG-40144, dated February 22, 1994

RBFI-95-0117
RBG-41486

Gentlemen:

On February 22, 1994, Entergy Operations Inc. (EOI) submitted an application for amendment to the River Bend Station (RBS) Technical Specifications (TS), License Amendment Request (LAR) 94-04 (Reference 1). Included were proposed changes which would extend the ACTION times of the leakage control systems. The submittal is based on specification 3.6.1.8 and 3.6.1.9 of NUREG-1434, "Standard Technical Specification General Electric Plants, BWR/6."

On April 20, 1995, the NRC Staff and RBS personnel discussed a concern over LAR 94-04. The concern deals with the change to the ACTION statement in the event both divisions of the penetration valve leakage control system (LSV) become inoperable due to unavailability of the LSV compressors and/or accumulator tanks. Under these conditions there would be no back-up air supply to the safety relief valves (SRVs) individual Steam Safety and Relief Valve System (SVV) air accumulators.

9505300173 950519
PDR ADOCK 05000458
P PDR

A017.1

The NRC initially suggested the use of bottled air or nitrogen as back-up when both LSV accumulators and/or compressors are inoperable. RBS agrees the use of bottles is an acceptable alternate supply but the use of this alternate may result in additional operator actions during an event.

During the ensuing investigation into the feasibility of using bottles as a backup, RBS identified the current installation of a diesel-driven air compressor capable of supplying the plant instrument air (IAS) and service air (SAS) systems at pressures about 135 psig. The IAS supply is hard-piped to both the SVV air supply air dryers' inlet and the divisional LSV piping. The piping downstream of the LSV accumulator tank provides back-up to the SVV divisional air supply header. The connections from IAS to LSV contain isolations which prevent a failure in the IAS piping system from affecting the safety-related LSV system.

A modification currently being installed makes a number of permanent changes and improvements in the plant IAS/SAS systems. These changes provide for isolating SAS loads in order to maintain IAS loads with any one of the normal IAS or SAS compressors (three IAS and three SAS electric air compressors) or the diesel air compressor supplying the loads. The diesel compressor's ability to operate is currently confirmed by weekly testing.

The design of the SVV air supply system, discussed in USAR Section 5.2, includes an air accumulator for each SRV. The seven Automatic Depressurization System (ADS) SRVs' SVV accumulators are capable of providing sufficient air pressure for a minimum of three lifts of each valve. The nine non-ADS SRVs' SVV accumulators are capable of providing sufficient air pressure for a minimum of one lift of each valve under design conditions. The ADS design basis (reactor isolation and failure of high pressure injection) requires a single lift of six of the seven ADS SRVs. The concern is for the long-term post accident/event availability (beyond DBA) of SRVs for reactor vessel pressure control. As discussed above, the LSV provides long-term backup-air supply to the SRVs through the LSV air accumulators which are maintained at pressures at or above 101 psig.

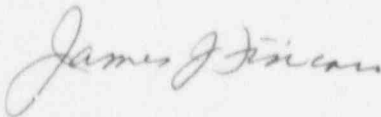
To resolve the NRC's concern, RBS proposes to place additional guidance in the current Technical Requirements Manual (see attachment). This guidance directs the operator to verify the availability of an alternate air supply upon the loss of both LSV air compressors/accumulators. With this verification, the operator is directed to maintain the availability of the alternate supply, thereby assuring long-term SRV function. The time period of four hours provides sufficient time for the operator to confirm availability of the alternate backup air supply to SRVs. The proposed time to supply an alternate is based on the unlikelihood of multiple failures resulting in loss of the backup supply (LSV) and an event requiring this feature. The addition to the LSV BASES provides guidance regarding an acceptable alternate.

License Amendment Request 94-04
RBE1-95-0117
RBG-41486
May 19, 1995
Page 3 of 3

Please note, TS 4.5.1.f requires the ADS header pressure to be above 131 psig (which also supplies all SRVs). If air pressure is less than 131 psig, the required ACTION is to reach HOT SHUTDOWN within 12 hours and less than 100 psig in the reactor vessel within the following 24 hours. As a result, the OPERABILITY of the ADS system must be confirmed or appropriate ACTIONS taken.

These clarifications have been discussed with RBS's NRR Project Manager. Based on these discussions, RBS recommends including these clarifications in the requested amendment. The proposed clarifications do not impact the scope of the original submittal and maintain the availability of the SRVs; therefore, they are bounded by the No Significant Hazards Considerations previously submitted in RBG-40144. If you have any questions or comments, please contact Mr. Otto P. Bulich of my staff at (504) 336-6251.

Very truly yours,



JJF/jr
attachment

cc: Mr. David L. Wigginton
U. S. Nuclear Regulatory Commission
M/S OWFN 13-H-2
Washington, DC 20555

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

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

License Amendment Request 94-04
RBF4-95-0117
RBC-41486
Attachment

Technical Requirements Manual additions

The following will be added to the Technical Requirements Manual upon receipt of approval of the requested amendment. Specification 3.6.1.10 PENETRATION VALVE LEAKAGE CONTROL SYSTEM

Insert:

ACTION

With both PVLCS air compressor/accumulators inoperable, within four hours verify availability of an alternate back-up air supply to the SVV air supply headers or initiate actions to provide an alternate within 12 hours.

SURVEILLANCE

With this ACTION entered confirm the continued availability of the alternate supply once per 24 hours.

The following is to be added to the Technical Specifications BASES of LSV, 3.6.1.10 for the current specifications.

An alternate air supply to the SVV accumulators is considered to be air pressure at or above 101 psi delivered by a diesel-driven air compressor or other supply source not dependent on off-site power.

Note: the above information will also be included in the Improved Technical Specifications.