ENTERGY

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U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
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Subject: Reply to Notice of Violation IR 95-02
River Bend Station - Unit 1/Docket No. 50-458

File No.: G9.5, G15.4.1

RBF1-95-0131
RBG-41579

Gentlemen:

Pursuant 10CFR2.201, please find Entergy Operation's response to the notice of violation described in NRC Inspection Report (IR) 95-02. This inspection was conducted by W.F. Smith on February 12 through March 25, 1995.

We understand the significance of this violation and have taken immediate and comprehensive action to resolve the issue. This violation cited a failure to properly maintain emergency lighting units functional.

Should you have any questions, please contact Mr. T. W. Gates at (504) 381-4866.

Sincerely,

James J. Fisicaro

JJF/jr
attachment

JE01

cc:

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ATTACHMENT A

NOTICE OF VIOLATION (458/95-02)

During an NRC inspection conducted on February 12 through March 25, 1995, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

License Condition 2.C.(10) states, in part, that the licensee shall comply with the requirements of the fire protection program as specified in Attachment 4 to the license.

Attachment 4 to the license states, in part, that the licensee shall implement and maintain in effect all provisions of the approved fire protection programs as described in the Final Safety Analysis Report for the facility.

The facility Updated Safety Analysis Report, Section 9A.3.5.5.1, "Emergency Lighting," states, in part, that emergency lighting shall be provided with a power source capable of sustaining the required level of illumination for a period of 8 hours.

Contrary to the above, on January 13, 1995, Emergency Lights 1LAP-1X4-12-0-B-1 and -2 and on February 16, Emergency Lights 1LAD-1G1-7-0-B-4, 1LAP-1X8-10-0-A-2, 1LAP-1X4-24-0-B-1, and 1LAR-1R17-8-0-B-6 were found incapable of providing the required levels of illumination.

Reason For The Violation

Entergy Operations agrees with this violation. It was determined that the root causes for this violation are less than adequate management follow-up for a condition analyzed in the past and less than adequate emergency lighting preventative maintenance (PM).

In November 1993, a Condition Report (CR) was issued documenting that PM frequencies for emergency lighting units were inconsistent, that aiming criteria for each unit was not available and there was no way to distinguish an Appendix R emergency lighting unit from a normal emergency lighting unit. Investigation of the 1993 condition indicated that the Appendix R lighting PM tasks were not being properly implemented. Since the Appendix R units were not uniquely identified, certain required PM's had been inappropriately canceled or inactivated. This resulted in the condition identified in the violation. The disposition to the 1993 CR resulted in the identification of lighting unit testing criteria and frequencies, and the development of Appendix M to the Safe Shutdown Analysis. This document provides a list of all lighting units required by Appendix R and provides drawings showing general unit location and aiming criteria. This was sufficient information to correct the deficiencies and bring this portion of the PM program into compliance.

An individual was assigned the responsibility to implement the corrective action for the 1993 condition which involved revising Preventative Maintenance Procedure (PMP)-1019 and causing the required PM's to be revised. It was then discovered that not only did the individual PM tasks for the Appendix R lights require a revision but there were PM tasks that were missing. Marked up versions of Appendix R tasks showing how they should be revised were turned over to a second individual for PM task development. The second individual subsequently terminated his employment at RBS. Maintenance management was not aware of the extent of actions required by the 1993 CR. Further, at this time corrective actions were not tracked to completion as a part of the corrective action program. As a result, the corrective actions were not properly reassigned or completed.

Corrective Steps That Have Been Taken And The Results Achieved

Maintenance was performed to return lighting units 1LAP-1X4-12-0-B-1 and 2, 1LAD-1G1-7-0-B-4, 1LAP-1X8-10-0-A-2, 1LAP-1X4-24-0-B-1 and 1LAR-1R17-8-0-B-6 to a functional status.

Monthly PM tasks for the Appendix R lighting units identified in Appendix M, including 12 units located in high radiation areas, have been developed. The monthly tasks have been performed as scheduled for those units outside the high radiation areas. The PM tasks for the 12 units located inside high radiation areas will be performed as soon as possible.

Corrective Steps That Will Be Taken To Avoid Further Violations

A comprehensive initiative outlined in the long term performance improvement plan (LTPIP) includes corrective action to address the completeness and adequacy of the technical content associated with preventative maintenance tasks. LTPIP Section 10 "Work Control" focuses initiatives to review and if necessary, revise existing preventative maintenance tasks for all disciplines, incorporate Reliability Centered Maintenance outputs into revised tasks, upgrade the PM program as a result of the system study outputs and conduct periodic assessments of the PM program effectiveness in accordance with the Maintenance Rule.

Currently the scope and content of PM's is determined by engineering review and frequency changes require engineering approval including deferrals. PEP-0044 (Preventative Maintenance Review), presently waiting to be approved, will provide the guidance for determining the PM's requirements for components and for performing reviews of PM tasks and frequencies. The implementation of the Maintenance Rule is causing an in-depth evaluation of some 85 systems. Missing, redundant or inadequate PM's should be identified as a result of the evaluation. These LTPIP actions along with other LTPIP initiatives directed to improve site processes and material condition should prevent recurrence of this and similar issues.

Management has reinforced expectations regarding follow up on corrective actions and has focused attention on corrective action completion. Additionally, the Condition Report (CR) process has since been modified as outlined in LTPIP section 7.1.2. Corrective actions are itemized, assigned to individuals with a due date and tracked in the CR data base to completion. These actions should reduce the potential for further violations.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved on 272 of the 284 Appendix R emergency lighting units. Seven units are located in the steam tunnel, a high radiation area, and cannot be tested without an outage. The other five units, also located in high radiation areas, are occasionally accessible. These 12 units will be attended to as soon as possible and no later than RF6.