



**GULF STATES UTILITIES COMPANY**

RIVER BEND STATION POST OFFICE BOX 220 ST. FRANCISVILLE, LOUISIANA 70775  
AREA CODE 504 636-6094 346-8651

June 15, 1992  
RBG- 36983  
File Nos. G9.5, G9.25.1.3

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, D.C. 20555

Gentlemen:

River Bend Station - Unit 1  
Docket No. 50-458

Please find enclosed Revision 2 to Licensee Event Report No. 91-011 for River Bend Station - Unit 1. The previous submittals of this LER stated that procedure REP-0010, Special Nuclear Material Control and Accounting, was revised to incorporate a checklist to verify the surveillance requirement of Technical Specification 3/4.6.5.2 (Secondary Containment Integrity - Fuel Handling). GSU is revising its response to include the checklist in procedure FHP-0001, Control of Fuel Handling and Refueling Operations. GSU has found that FHP-0001 is the most appropriate location for the fuel movement checklist.

Sincerely,

W.H. Odell  
Manager - Oversight  
River Bend Nuclear Group

LAE/DPG/JPS/GSY/DCH/kvm

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

NRC Resident Inspector  
P.O. Box 1051  
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Mr. C.R. Oberg  
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7800 Shoal Creek Blvd., Suite 400 North  
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Louisiana Department of Environmental Quality  
Nuclear Energy Division  
P.O. Box 82135  
Baton Rouge, LA 70884-2135  
ATTN: Administrator

## LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST 500 HRS FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530) US NUCLEAR REGULATORY COMMISSION WASHINGTON DC 20555 AND TO THE PAPERWORK REDUCTION PROJECT (J1560104) OFFICE OF MANAGEMENT AND BUDGET WASHINGTON DC 20503

FACILITY NAME (1) <b>RIVER BEND STATION</b>										DOCKET NUMBER (3) <b>0 5 0 0 0 1 4 5 8 1</b>										PAGE (5) <b>1 OF 4</b>																																							
TITLE (4) <b>INADEQUATE IMPLEMENTATION OF SURVEILLANCE REQUIREMENTS PER TECHNICAL SPECIFICATION 3/4.6.5.2 (SECONDARY CONTAINMENT INTEGRITY-FUEL HANDLING) DUE TO PROCEDURAL DEFICIENCIES</b>																																																											
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 NAMES										DOCKET NUMBER(S)																						
06			04			91			91			01			11			02			06			15			92													0 5 0 0 0 0																			
OPERATING MODE (9) <b>1</b>										THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5. (Check one or more of the following) (11)																																																	
POWER LEVEL (10) <b>1.00</b>										20.402(b)										20.406(c)										50.73(a)(2)(iv)										73.71(b)																			
										20.408(a)(1)(ii)										50.38(a)(1)										50.73(a)(2)(iv)										73.71(a)																			
										20.408(a)(1)(iii)										50.38(a)(2)										50.73(a)(2)(iv)										OTHER (Specify in detail below and on Test NRC Form 366A)																			
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20.408(a)(1)(vi)										50.73(a)(2)(iv)										50.73(a)(2)(iv)										50.73(a)(2)(iv)																													
LICENSEE CONTACT FOR THIS LER (12)																																																											
NAME <b>L.A. ENGLAND, DIRECTOR - NUCLEAR LICENSING</b>																				TELEPHONE NUMBER																																							
																				AREA CODE <b>5 0 4 3 8 1 - 4 1 4 5</b>																																							
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 SUBMISSION DATE (15)										MONTH DAY YEAR																													
YES (if yes, complete EXPECTED SUBMISSION DATE)																				X NO																																							
ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single space typewritten lines) (16)																																																											
<p>At 1424 on June 4, 1991, with the reactor in Operational Condition 1 (Power Operation), irradiated fuel was moved in the fuel building without prior performance of surveillance requirements under Technical Specification (TS) 3/4.6.5.2 (Secondary Containment Integrity - Fuel Building). Since the plant was in compliance with TS 3/4.6.5.1 (Secondary Containment Integrity-Operating) and plant staff personnel took conservative actions to verify fuel building integrity, secondary containment integrity was assured prior to fuel movement. Thus, the intent of TS 3/4.6.5.2 was met. However, this report is submitted pursuant to 10CFR50.73(a)(2)(i)(B) to document the non-compliance with the surveillance requirement.</p> <p>The procedures used during this evolution provided inadequate guidance to assure the requirements of TS 3.6.5.2 were met. The lack of checklists and/or prerequisite steps requiring signoff, coupled with the duration of the work, led the Shift Supervisor to assume that all pertinent requirements had been met during preparations made in previous shifts.</p> <p>The fuel building pressure was less than the .25 inches of water vacuum required by the Technical Specifications and the fuel building charcoal filtration train was in service. If a fuel drop accident occurred during fuel movement, the fuel building ventilation exhaust would have filtered as designed.</p>																																																											

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATIONAPPROVED OMB NO 3150-0104  
EXPIRES 4/30/92ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS  
INFORMATION COLLECTION REQUEST 500 HRS. FORWARD  
COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS  
AND REPORTS MANAGEMENT BRANCH (F530) U.S. NUCLEAR  
REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO  
THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE  
OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

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RIVER BEND STATION

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TEXT (If more space is required, use additional NRC Form 388A (1/1/77))

REPORTED CONDITION

At 1424 on June 4, 1991, with the reactor in Operational Condition 1 (Power Operation), irradiated fuel was moved in the fuel building (\*ND\*) without prior performance of surveillance requirements under Technical Specification (TS) 3/4.6.5.2 (Secondary Containment Integrity - Fuel Building). Since the plant was in compliance with TS 3/4.6.5.1 (Secondary Containment Integrity-Operating), and plant staff personnel took conservative actions to verify fuel building integrity, secondary containment integrity was assured prior to fuel movement. Thus, the intent of TS 3/4.6.5.2 was met. However, this report is submitted pursuant to 10CFR50.73(a)(2)(i)(B) to document the non-compliance with the surveillance requirement.

INVESTIGATION

At 0905 on 6/4/91 the fuel building ventilation system (\*VG\*) was placed in the refuel mode of operation. Fuel building pressure was verified to be less than the required .25 inches of water vacuum by the reactor engineer.

At about 1330 the Shift Supervisor (SS) left the control room to observe the fuel inspection preparations in the fuel building (\*ND\*). Prior to entering the fuel handling floor, he toured the non-high radiation areas of the fuel building (\*ND\*). During this tour, he noted that all external doors were closed and that fuel building pressure was .7 inches of water vacuum. Following entry into the fuel handling floor, he consulted the Senior Reactor Operator (SRO) and the reactor engineer to assure that all the required actions had been taken prior to fuel movement. The SS assumed that Technical Specification 3/4.6.5.2 had been satisfied by the fuel inspection preparations and did not personally review it prior to fuel movement. At 1424 fuel movement began. After leaving the fuel building, the SS informed the Assistant Operations Supervisor that fuel movement had begun. During this discussion it was revealed that the fuel building pressure had been verified, but the surveillance had not been performed per the Technical Specification.

Due to the conservative and cautious actions of the operators and reactor engineers through inspections and station operating procedure (SOP) actions, it was found that fuel building integrity had been verified prior to moving irradiated fuel. While the surveillance test procedure (STP) had not been explicitly performed, all of the STP actions were implemented with the exception of one ventilation access hatch verification. The fuel building pressure was at .7 inches of water vacuum with the fuel building charcoal filtration train running. This pressure was less than the .25 inches of water vacuum required by the Technical Specifications.

Following the discovery that the surveillance had not been performed, all fuel inspection activity was halted. The surveillance procedure was completed at 1720 and the results confirmed compliance with TS requirements.

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TEXT: If more space is required, use additional NRC Form 388A (1) (17)

A review of the procedures involved found that TS 3.6.5.2 was referenced, but no signoff was required to verify that its conditions were met.

**ROOT CAUSE**

The procedures used during this evolution provided inadequate guidance to assure the requirements of TS 3.6.5.2 were met. These procedures included FHP-0007, Use of Fuel Preparation Machines, and FHP-0002, Fuel Handling Platform Operation. The lack of checklists, coupled with the duration of the work, led the Shift Supervisor to assume that all pertinent requirements had been met during preparations made in previous shifts. A contributing factor was that this was the first time that fuel movement had been performed when the plant was not in a refueling outage (Operational Condition 5).

A review of previous events revealed one similar LER. LER 88-010 reported that the surveillance requirements for TS 4.6.5.1(b) (Secondary Containment - Operating) had not been properly implemented for four doors; to verify that they were closed once every 31 days. The root cause was that the initial STP review was not adequate. However, in this event (LER 91-011), the STP was adequate, but there were deficiencies in other procedures.

**CORRECTIVE ACTION**

The following corrective actions were taken:

1. Fuel handling operations were stopped and the surveillance under TS 4.6.5.2 was performed and found acceptable.
2. A review of Technical Specifications was performed identifying 12 Limiting Conditions for Operation associated with Operational Condition \* (Handling of Irradiated Fuel in the Fuel Building). An independent review of these Technical Specifications was performed to verify that all other requirements were satisfied prior to fuel movement.
3. Procedure FHP-0007 (Use of Fuel Preparation Machines) was revised to add a prerequisite requiring Secondary Containment Integrity - Fuel Building per Technical Specification 3.6.5.2.
4. Procedure FHP-0002 (Fuel Handling Platform Operation) was revised to add a step for SRO verification of the Technical Specification requirements prior to the handling of irradiated fuel.
5. Procedure FHP-0001 (Control of Fuel Handling and Refueling Operations) was revised to incorporate a checklist with sign-offs by an SRO which includes verifying the surveillance requirement of TS 3/4.6.5.2 prior to handling irradiated fuel in the fuel building. Shift Supervisor review and approval is required prior to fuel handling.



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TEXT (If more space is required, use additional NRC Form 305A 1/ (17))

6. The surveillance test procedure (STP) matrix has been revised to include an event-related matrix for Operational Condition \*. This matrix includes the Technical Specification surveillances required prior to moving irradiated fuel in the fuel building regardless of the plant operational condition.
7. All of the operating crews were briefed by the Assistant Plant Manager - Operations, Radwaste and Chemistry on the significance of the missed surveillance and the importance of attention to detail.

SAFETY ASSESSMENT

The fuel building pressure was less than the .25 inches of water vacuum required by the Technical Specifications and the fuel building charcoal filtration train was in service. If a fuel drop accident had occurred during fuel movement, the fuel building ventilation exhaust would have been filtered as designed.

NOTE: Energy Industry Identification System Codes are identified in the text as (\*xx\*).