



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

Rick J. King
Director
Nuclear Safety & Regulatory Affairs

October 10, 1996

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
M/S P1-37
Washington, DC 20555-0001

Subject: Reply to August 15, 1996, NRC Letter
River Bend Station - Unit I
License No. NPF-47
Docket No. 50-458

File No: G9.5

RBG-43289
RBF1-96-0378

Ladies and Gentlemen:

The attached information addresses an August 15, 1996, NRC letter from Mr. Stuart A. Richards, Chief Operator Licensing Branch, Division of Reactor Controls and Human Factors, Office of Nuclear Reactor Regulation, to Mr. Don Hintz, Chief Executive Officer, Entergy Operations Inc. (EOI), regarding the River Bend Station (RBS) simulator. The letter documented the results of an off-site NRC review of the RBS simulator problem report list. The problem report list appears to have been viewed as a discrepancy list which resulted in a mischaracterization of several problem reports. The RBS simulator problem report list is used to document questions and desired improvements as well as potential simulator discrepancies. The simulator problem report list at RBS is not a verified discrepancy list and no significant simulator degradations exist.

Several onsite internal and external reviews, inspections and assessments over the last two years have documented the River Bend simulator is capable of supporting quality training. In addition, the results showed the problem reports do not have a significant negative impact on operator training. Better communication between the NRC and RBS on the

9610230176 961010
PDR ADDCK 05000458
P PDR

ADD 1/1

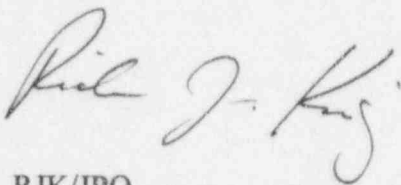
Reply to August 15, 1996, NRC Letter
October 10, 1996
RBG-43289
RBF1-96-0378
Page 2 of 2

purpose and contents of the list would have clarified the specifics of the current status of the River Bend simulator.

While the River Bend simulator is currently meeting ANSI/ANS 3.5 1985 requirements (with the exceptions listed on NRC Form 474 "Simulation Facility Certification", Attachment 1), a substantial simulator upgrade project has been underway and is continuing to enhance simulator capabilities.

Should you have any questions regarding the attached information, please contact Mr. David Lorring of my staff at (504) 381-4157.

Sincerely,



RJK/JPO
attachments

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

NRC Sr. Resident Inspector
P. O. Box 1050
St. Francisville, LA 70775

David Wigginton
NRR Project Manager
U. S. Nuclear Regulatory Commission
M/S OWFN 13-H-15
Washington, DC 20555

ATTACHMENT

The RBS simulator problem report list contains all open items identified (questions, problems, requests, ...). RBS encourages operators, management evaluators, and instructors to document questions and desired improvements and enhancements concerning the simulator. The intention of the list is to solicit and encourage the identification of simulator improvement items no matter how insignificant they may appear. The problem reports are not screened or validated prior to being entered into the simulator problem report list. As mentioned during the NRC's request, the simulator problem report list reflects "raw data." Because of this, items identified on the list may be enhancements, desired improvements, misapprehensions, or merely reflect an operator, instructor, or observer questioning a given scenario or simulator response.

Reflecting this very low threshold for problem report initiation, simulator problem reports vary widely in validity and importance. Since RBS encourages this low threshold for simulator problem reports, it is particularly important to have an understanding of each problem and how it is graded to properly characterize that problem.

The Simulator Performance Verification and Configuration Management Procedure controls the disposition of simulator problem reports. This procedure defines four categories of Simulator problem reports. The problem reports are classified into one of these four categories.

- Priority 1: "The degradation in training effectiveness is significant and simulator training should be minimized until corrected".
- Priority 2: "There is some degradation in training effectiveness. The deficiency does not, however, render the training features of the simulator ineffective for training."
- Priority 3: "The deficiency causes no specific degradation in training effectiveness. The deficiency may be a distraction to students or instructors in the conduct of simulator exercises. The deficiency should be resolved to ensure simulator technical accuracy and training effectiveness."
- Priority 4: "It is desirable to enhance the current capabilities of the simulator."

River Bend currently has no priority 1 simulator problem reports. Of the 29 problem reports listed as being of the most concern by the NRC, 5 have been resolved, 5 are rated as priority 2, 16 are rated as priority 3, and 3 are rated as a priority 4. Of the problem reports listed, 18 of them were initiated within the previous 6 months.

Several problem reports on the "most concern" list were efficiency requests by instructors for activation of a malfunction or enclosure by a single key stroke instead of using preprogramming or overrides. They do not reflect an inability of the simulator to produce a result. The current project to upgrade the instructor's console is addressing these issues.

Simulator fidelity observations in the emergency procedure inspection (report 50-458/95-06) conducted in January 1995 identified the existing simulator fidelity problems were known and appropriate action plans had been initiated. It was also noted continuing

ATTACHMENT

simulator fidelity problems were being addressed by long term simulator upgrade projects such as the installation of the new core and thermal hydraulics model and the containment and activity transport models. Both of these models were installed as scheduled in late 1995. Based on personnel interviews, this report concluded there was strong management support for simulator upgrades and the simulator problems did not have a negative impact on training.

Simulator fidelity observations in the licensed operator requalification program inspection report 50-458/95-27 conducted in November, 1995, concluded the simulator facility was serving training needs well. The inspectors did not find any simulator problems which would result in a significant negative impact on training.

Entergy Operations Inc. (EOI) Plant Support and Assessment Department, conducted a team self-assessment of Operator Simulator Training from August 5th through 9th, 1996. Using NRC Inspection Reports, Audit/Assessment Reports, Configuration Control Procedure, Annual Test Plan, Root Cause Report, independent observations and interviews with instructors and operators, the team evaluated the configuration control program for simulator hardware and software to determine if the simulator accurately represents the operational characteristics of plant components and systems. The team also evaluated the scope of simulation to determine if it was adequate to provide quality training. The team determined the simulator is able to provide quality training.

Several major simulator upgrades have been implemented in the past few years. Currently an improved instructor console is being installed which will enhance troubleshooting ability and increase the number of usable malfunctions and overrides. River Bend continues to maintain a low threshold for simulator problem reports. This process along with the other ongoing enhancements ensures the RBS simulator supports high quality operator training.