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Subject: River Bend Station - Unit 1  
Docket No. 50-458  
License No. NPF-47  
Request for Additional Information for License Amendment Request (LAR) 95-10, "Deletion of Technical Specification 5.5.12, 'Biofouling Prevention and Detection' and Various Editorial Corrections to Technical Specifications." (TAC NO. M93991)

File Nos.: G9.5, G9.42

Reference: RBG-41968, "Deletion of Technical Specification 5.5.12, 'Biofouling Prevention and Detection' and Various Editorial Corrections to Technical Specifications," dated October 26, 1995

RBF1-97-0115  
RBG-43828

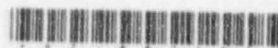
Ladies and Gentlemen:

On October 26, 1995, Entergy Operations Inc. (EOI) submitted an application for amendment to the River Bend Station (RBS) Technical Specifications (TS). (Reference 1) This submittal included a request for an editorial change to the wording of "Function 12. Penetration Flow Path, PCIV Position" of TS Table 3.3.3.1-1, "Post Accident Monitoring Instrumentation." The proposed change inserts the word "Automatic" before "PCIV" consistent with the TS 3.3.3.1 Bases issued to RBS by TS Amendment 81, "Conversion to Technical Specifications Based on NUREG-1434, 'Improved Technical Specifications, Revision 0.'"

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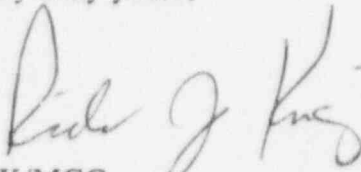
By letter dated May 20, 1996, the NRC Staff requested additional information to confirm that the requested change was, in fact, editorial and that NRC requirements for all power-operated, i.e., automatic and non-automatic, primary containment isolation valves (PCIVs) position indication were satisfied. The EOI response to this request for additional information is provided in Attachment 1.

RBS continues to propose an editorial change to the TS Table 3.3.3.1-1, Function 12 line description to read:

"Primary Containment Penetration Flowpath, Automatic PCIV Position."

The additional information provided for this change does not impact the scope of the original submittal nor effect the No Significant Hazards Consideration previously submitted in RBG-41968. If you have any additional questions or comments, please contact Tim Gates at (504) 381-4866.

Very truly yours,



RJK/MGC  
attachment

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## ATTACHMENT 1

### RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION (RAI) FOR TAC NO. M93991 (LAR 95-10), EDITORIAL CHANGES TO THE RIVER BEND STATION TECHNICAL SPECIFICATIONS

#### **BACKGROUND:**

Technical Specification (TS) Table 3.3.3.1-1, "Post Accident Monitoring Instrumentation," currently contains a line of requirements that is labeled "Penetration Flow Path, PCIV Position." By letter dated October 26, 1995, Entergy Operations, Inc. (EOI) proposed a change, characterized as editorial, which would insert the word "Automatic" before "PCIV" (primary containment isolation valve). The explanation or justification provided for the requested change was as follows:

Table 3.3.3.1-1, Function 12 - "Automatic" added for clarification and to be consistent with bases. Only automatic PCIVs are required to have Post Accident Monitoring (PAM) position indication. Adding "Automatic" makes it clear that manual PCIVs are not included in this specification.

By letter dated May 20, 1996, the NRC requested additional information regarding this change. The discussion that follows provides EOI's response to this request.

#### **DISCUSSION:**

The staff requested the following information:

1. Discuss whether the current design of the PAM position indication system includes only automatic PCIVs, or whether it also includes any other PCIVs such as remote-manual PCIVs. Please note that PCIVs which open automatically during an accident, such as PCIVs in ECCS lines at most plants, are not "automatic" PCIVs by standard definition, but rather are considered to be remote-manual PCIVs. A PCIV must close automatically to be considered an automatic PCIV.

## RESPONSE:

The PAM PCIV position instrumentation consists of individual position indication (open - closed) in the control room for each primary containment isolation valve (excluding check valves) designed to close automatically without operator action to establish primary containment integrity.

In general, OPERABILITY of the PAM PCIV instrumentation ensures that the control room operating staff can, consistent with the recommendations of Regulatory Guide (RG) 1.97 for Category 1, non-Type A variables, determine whether the containment isolation system is performing its intended function or whether a gross breach of the containment isolation system has occurred. More specifically, PAM PCIV instrumentation OPERABILITY provides for verification of the status of the primary containment penetration flowpaths of the containment isolation system required to close automatically, within specified time limits, to prevent the release of significant amounts of radioactive materials from the primary containment to the environment consistent with the assumptions used in the analyses for the Design Basis Accident (DBA).

Regarding "less restrictive" Amendment 81 changes to the PAM TS requirements, the NRC Safety Evaluation Report (SER) stated that, "In general, accident monitoring instrumentation is required to provide sufficient information to the operator in the control room to assess plant response in the event of an accident; i.e., to indicate that **automatic** [emphasis added] safety systems are performing properly, and deviations from expected accident course are minimal." The SER further stated that "An additional post accident monitoring (PAM) function is included in improved TS 3.3.3.1, penetration flow path **automatic** [emphasis added] PCIV position. This function was added in accordance with the NUREG-1434 guideline to include all (1) Type A and (2) Category 1 non-Type A PAM instrumentation."

Identical TS PAM PCIV position instrumentation Bases were issued to each of the four BWR6s as part of their improved standard technical specifications (ISTS) conversion amendment. These bases were developed during a common NRC/BWR6 ISTS acceptance review which included specific discussion of the application of this requirement to "automatic" PCIVs. The resulting NRC issued Bases consistently limit the scope of this requirement to "position indication for automatic PCIVs."

2. The River Bend containment isolation system design includes remote-manual PCIVs. Regulatory Guide 1.141, national standard ANSI N271-1976/ANS-56.2, and Standard Review Plan 6.2.4 provide that all power-operated PCIVs, not just automatic ones, should have position indication in the control room.
- a. Confirm that River Bend Station has safety-grade position indication for all power-operated PCIVs, including automatic and remote manual PCIVs, in the main control room.

**RESPONSE:**

RBS has confirmed that all power-operated PCIVs, including automatic and remote-manual PCIVs, have safety-grade position indication in the main control room. With the exception of the Main Steam Isolation Valves (MSIVs), this position indication is supplied from 1E power sources. The MSIVs position indication is powered from reactor protection system (RPS) power which is backed by alternate 1E supply sources.

- b. Discuss the requirements placed on non-automatic, power operated PCIVs (e.g., remote-manual PCIVs) by Table 3.3.3.1-1, Function 12, in the current TS, and how the requirements would change with the insertion of the word "Automatic" as proposed. Also, describe any other TS besides Table 3.3.3.1-1, Function 12, which govern the position indication of non-automatic, power-operated PCIVs.

**RESPONSE:**

There are no requirements placed on non-automatic, power-operated PCIVs (e.g., remote-manual PCIVs) position indication by Table 3.3.3.1-1, Function 12. Addition of the word "Automatic" is purely an editorial clarification, consistent with the NRC issued Bases discussion for this function, and does not constitute a change in the intent or scope of this requirement as issued. This presentation is consistent with NUREG-1434 and reflects the manner in which all the BWR6s are implementing the requirements of this specification.

Loss of position indication for PCIVs outside the scope of TS 3.3.3.1 would, at a minimum, require an operability assessment of the PCIV's ability to perform its specified safety function in accordance with TS 3.6.1.3. This action would be driven by the maintenance request and/or corrective action reporting processes, and invoke the appropriate operability assessment process.

- c. Discuss whether the proposed change would constitute a reduction in the TS requirements governing the position indication of non-automatic, power-operated PCIVs. If it would, justify the change on some basis other than editorial clarification, and address the staff's regulatory position, set forth in the guidance documents cited above, that automatic and non-automatic, power-operated PCIVs are of equal importance in terms of need for position indication. The response should include a discussion of the actions that would be required by the TS, if revised as proposed, if the position indication for a non-automatic power-operated PCIV failed (including having less than 2 channels per penetration flow path). Also discuss the effect on PCIV operability of a position indicating light being out.

RESPONSE:

The proposed change does not constitute a reduction in TS requirements governing the position indication of non-automatic, power-operated PCIVs as these indications are not included within the scope of the PAM instrumentation TS. Both NUREG-1434 and the NRC issued Bases for PAM PCIV position instrumentation make it clear that the scope of this requirement is limited to automatic PCIVs.

RBS understands the concern that the exclusion of non-automatic PCIV position indication from the scope of the PAM TS requirements could allow licensees to indefinitely defer action to correct broken non-automatic PCIV position indication. While RBS acknowledges that legally this potential does exist, it would be contrary to our established practices.

Any loss of PCIV position indication would require an operability assessment for the associated PCIV. This action would be directed by the maintenance request and/or corrective action reporting processes and invoke the necessary operability assessment process. If the loss of position indication did not affect the capability of the PCIV to perform its specified safety function AND an alternate means existed for ascertaining the performance of the PCIV's safety function, then although considered degraded, the PCIV would not be considered inoperable. Past experience has shown that the majority of position indication problems are discovered during stroke time tests and due to the inability to verify stroke time without indication, the PCIV is initially declared inoperable by default. No specific examples could be identified where RBS has acted inappropriately in this regard.