

## LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503

FACILITY NAME (1)

River Bend Station

DOCKET NUMBER (2)

05000-458

PAGE (3)

01 of 09

TITLE (4)

Missed Surveillances due to Human Errors

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 NAME	DOCKET NUMBER
07	10	96	96	014	01	04	17	97	N/A	05000
OPERATING MODE (9)			1			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more (11))				
POWER LEVEL (10)			100			20.402(b)				
						20.405(a)(1)(i)				
						20.405(a)(1)(ii)				
						20.405(a)(1)(iii)				
						20.405(a)(1)(iv)				
						20.405(a)(1)(v)				
						20.405(c)				
						50.36(c)(1)				
						50.36(c)(2)				
						50.73(a)(2)(i)				
						50.73(a)(2)(ii)				
						50.73(a)(2)(iii)				
						50.73(a)(2)(iv)				
						50.73(a)(2)(v)				
						50.73(a)(2)(vii)				
						50.73(a)(2)(viii)(A)				
						50.73(a)(2)(viii)(B)				
						50.73(a)(2)(x)				

(Specify in abstract below and in text, NRC Form 366A)

## LICENSEE CONTACT FOR THIS LER (12)

NAME

David Lorfig, Supervisor - Nuclear Licensing

TELEPHONE NUMBER (Include Area Code)

504-381-4157

## COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

## SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE)	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
	X				

## ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On July 10, 1996, with the plant in Mode 1 and 100% power, River Bend personnel discovered that a surveillance test required to determine the capacity of Division 1 Station Service Batteries was not performed within the required frequency of 18 months. As a result, the plant entered surveillance requirement (SR) 3.0.3 which allowed up to 24 hours to perform the missed surveillance. Subsequently, a plant shutdown started on July 11, 1996, to perform the surveillance.

During investigation of this event, a review of previous surveillance test procedures identified other similar surveillance conditions. Because of their similarity, these conditions are also being reported in this LER.

The root causes to these events included personnel errors, procedural inadequacies and inadequate reviews of test results. Additional root causes of the events are discussed in the report. The systems affected by the missed surveillances were demonstrated to have been capable of performing their safety functions based on retest of the systems. These events were, therefore, not safety significant.

NRC FORM 366A (5-92)	U.S. NUCLEAR REGULATORY COMMISSION	APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95		
<p align="center"><b>LICENSEE EVENT REPORT (LER)</b> <b>TEXT CONTINUATION</b></p>		<p>ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.</p>		
		FACILITY NAME (1) <b>River Bend Station</b>	DOCKET NUMBER (2) <b>05000-458</b>	LER NUMBER (6) <b>96-014-01</b>

### Reported Conditions:

On July 10, 1996, with the plant in Mode 1 and 100% power, River Bend Station (RBS) personnel discovered that a surveillance test procedure STP-305-1700 (Division 1 Station Service Battery Performance Discharge Test) was not performed within its Technical Specification (TS) 3.8.4.8 required frequency of 18 months. A battery capacity degradation of >10% was recorded during the last performance of the STP in May 1994. This result required that the STP frequency be increased from 60 months to 18 months. Therefore, this condition constitutes a missed surveillance and is reportable pursuant to 10CFR50.73(a)(2)(i)(B) as operation prohibited by TS.

Due to the missed battery (\*BTRY\*) surveillance, entry was made into the TS surveillance requirement (SR) 3.0.3 which allows 24 hours to run the test or implement measures to preclude its requirement. A notice of enforcement discretion was requested but was not granted. Upon expiration of TS (SR) 3.0.3 on July 11, 1996, entry was made into TS 3.8.4 action statement which requires the system be returned to operable status within 2 hours or be in Mode 3 within 12 hours and Mode 4 within 36 hours. The plant commenced shutdown to perform the test. Mode 3 was entered at 0436 hour on July 12, 1996. This condition constitutes a plant shutdown required by the TS and is reportable pursuant to 10CFR50.73(a)(2)(i)(A).

As a result of this event, an extensive review of the surveillance test procedures (STP) was undertaken to review 18 month frequency shutdown STPs to verify that technical specifications were met. Listed below are the similar conditions identified in this review:

- On July 15, 1996, RBS discovered that Division 3 High Pressure Core Spray (HPCS), Battery Performance Discharge Test, STP-203-1702, was performed in place of Battery Service Test, STP-203-1608, on January 9, 1996, during refueling outage 6 (RF-6). TS surveillance requirement 3.8.4.8 allows substitution of the performance discharge test for a service test (TS 3.8.4.7) once per 60 months. Since the battery performance discharge test was performed in refueling outage (RF) 5, the battery service test should have been performed in RF-6. The failure to perform the battery service test during RF-6 constitutes a missed surveillance. Therefore, this condition is reportable pursuant to 10CFR50.73(a)(2)(i)(B) as operation prohibited by TS.
- On July 16, 1996, RBS identified that the Local Leak Rate Testing (LLRT) for the containment unit cooler inboard Isolation Valve (SWP-MOV 503A)(\*ISV\*) was deferred during RF-6. It was originally thought that this deferment was in violation of Technical Specification Surveillance 3.6.1.1.1 testing frequency of 24 months and was, therefore, reportable pursuant to 10CFR50.73(a)(2)(i)(B) as operation prohibited by TS. However, upon further evaluation it was concluded that the committed regulatory requirements (10CFR50, Appendix J, Option B, Regulatory Guide 1.163 and NEI 94-01, Industry Guideline for Implementing Performance Based Option of 10 CFR 50, Appendix J) allowed the extension of LLRT intervals, based on the previous satisfactory results of two consecutive LLRTs, as was the case for the valve (SWP-MOV 503A)(\*ISV\*). This condition is, therefore, not reportable.

NRC FORM 366A (5-92)	U.S. NUCLEAR REGULATORY COMMISSION	APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95	
<p align="center"><b>LICENSEE EVENT REPORT (LER)</b> <b>TEXT CONTINUATION</b></p>		<p>ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503</p>	
		FACILITY NAME (1) <b>River Bend Station</b>	DOCKET NUMBER (2) <b>05000-458</b>

On September 9, 1996, RBS determined that deferring LLRTs of the service water valves SOV 522B and SOV 522D during RF-6, was in violation of Technical Specification Surveillance 3.6.1.1.1 required frequency of 24 months. The failure to perform this LLRT during RF-6 constitutes a missed surveillance and is, therefore, reportable pursuant to 10CFR50.73(a)(2)(i)(B) as operation prohibited by TS.

- On July 15, 1996, RBS discovered that the STPs for Fuel Building HVAC (STP-406-0601), Standby Gas Treatment / Annulus Mixing System (STP-403-0601) and Main Control Room A/C (STP-402-4501) did not adequately test the pressure drop across the prefilters (\*FLT\*) as required by TS 5.5.7.d. Further investigations revealed that the prefilter test requirement of TS 5.5.7.d was unintended and not required by the ANSI N510-1989 or by the Regulatory Guide 1.52 as stated in the current TS. The requirement was inadvertently included in the current TS during Improved Technical Specification (ITS) development. The STPs however met the intent of the surveillance requirement in that they were consistent with the requirements of ANSI N510-1989 and Regulatory Guide 1.52. Therefore, these conditions are not reportable. However, since these conditions reflect a TS inconsistency and may be of importance to the industry, information provided on this condition is voluntary.

In February 1996, the leak rate tests performed on the Drywell Personnel Airlock (\*AL\*) Door Seal Air System (STP-057-7204) and the Drywell Equipment Hatch/Personnel Door Seal Pneumatic System (STP-057-7205) had test performance discrepancies. The surveillance test results from the February 1996 tests were evaluated and found to meet the surveillance and operability requirements of the TS. Therefore, this condition was determined to be not reportable. Information provided on this condition is voluntary.

#### Investigation:

##### Division 1 Station Service Battery

On July 10, 1996, RBS discovered that Surveillance Test Procedure STP-305-1700 (Division 1 Station Service Battery Performance Discharge Test) was not performed within its Technical Specification (TS) 3.8.4.8 required frequency of 18 months. A battery capacity degradation of >10% had been indicated during the last performance of the STP in May 1994. The STP should have been performed on a frequency of 18 months.

Investigation of the event revealed that the performing and supervising personnel for Division 1 Station Service Battery Test (STP-305-1700) did not adequately understand the acceptance criteria. The test acceptance criteria was stated in section 8.1 and 8.2 of the STP. However, the supervisors signing of the acceptance criteria and accepting the test results, were unaware that the battery capacity, as determined by this test can exceed 100%. The battery capacity determined in the two previous tests was 113% (1989) and 103% (1984). These results were not used to determine the battery capacity degradation. However, Step 6.10 of STP-305-1700, for Battery Performance Discharge Test, had been removed from the procedure using a change notice. The deleted step required the performer to review previous performance tests in order to determine the average battery capacity, and include a copy of the previous performance test in the data package. Since this step was removed, it was not performed. This was a critical procedure step in that



NRC FORM 366A (5-92)	U.S. NUCLEAR REGULATORY COMMISSION	APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95		
<p align="center"><b>LICENSEE EVENT REPORT (LER)</b> <b>TEXT CONTINUATION</b></p>		<p>ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.</p>		
		FACILITY NAME (1) <b>River Bend Station</b>	DOCKET NUMBER (2) <b>05000-458</b>	LER NUMBER (6) <b>96-014-01</b>

it required the test performers to use previous test results to perform an accurate calculation of battery capacity degradation. The reviewers of the test results did not identify that the previous test results were not used to determine the battery capacity degradation, as required by the acceptance criteria of the STP. The procedure change, involving removal of the Step 6.10 from STP-305-1700, may have contributed to this oversight.

An extensive effort was undertaken by RBS as a result of this event. A Significant Event Response Team (SERT) was formed to investigate and determine the root causes of the missed surveillances and recommend corrective actions. In addition, a Quality Assurance led multi-discipline team was formed to review 18 month frequency shutdown STPs, to verify that the required technical specifications were met. A total effort of over 2000 man-hours has been expended to research and review related information, perform interviews, determine root causes and corrective actions.

#### High Pressure Core Spray (HPCS) Battery

On January 9, 1996, the HPCS Battery Performance Discharge Test (STP-203-1702), was performed in place of the HPCS Battery Service Test (STP-203-1608). The test personnel incorrectly relied on the information obtained concerning testing the batteries during RF-5 and assumed that it was still acceptable for use in RF-6. The Technical Specifications were not consulted to determine if their assumptions were correct. Technical Specifications allow substituting the performance discharge test for the service test once per five years. The substitution had been done in RF-5 in May 1994.

The system engineer was unaware of this testing in RF-5. Therefore, the engineer thought that a five year performance discharge test was needed to meet the two year requirement for testing as recommended by the IEEE-450 standard. The engineer did not recognize that Technical Specification requirements must be used for the required testing and the IEEE standard requirement for testing was only a recommendation.

#### STP for Valve LLRT Deferred Inappropriately

The LLRT testing for the Containment Unit Cooler Inboard Isolation Valve (SWP-MOV503A, STP-256-3828) was deferred in RF-6. This deferment was originally thought to be inconsistent with the Technical Specification Surveillance Requirement 3.6.1.1.1. However, further evaluation concluded that while the program requirements of the controlling procedure (ADM-0050) were not met, the deferment did not violate requirements of the committed regulatory documents (10CFR50, Appendix J, Option B, Regulatory Guide 1.163 and NEI 94-01). These documents allow extension of the LLRT frequency for the valves passing two consecutive as-found LLRTs. The Unit Cooler Inboard Isolation Valve (SWP-MOV503A) met this requirement based on the successful as-found testing during RF-3 and RF-4.

The LLRT testing for the service water valves (SWP-SOV 522B & 522D, STP-256-3828) was deferred from RF-6 based on the results of as-left tests of May 19, 1993 and May 21, 1994. The deferment of LLRTs was not consistent with the Technical Specification Surveillance Requirement 3.6.1.1.1 and the Performance Based Leak Rate Testing Program described in the procedure ADM-0050.

NRC FORM 366A (5-92)	U.S. NUCLEAR REGULATORY COMMISSION	APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95		
<p align="center"><b>LICENSEE EVENT REPORT (LER)</b> <b>TEXT CONTINUATION</b></p>		<p>ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503</p>		
		FACILITY NAME (1) <b>River Bend Station</b>	DOCKET NUMBER (2) <b>05000-458</b>	LER NUMBER (6) <b>96-014-01</b>

ADM-0050 requires the performance of this test on a 24 month frequency. ADM-0050 permits the extension of LLRT test intervals based on the as-left test data. However, to allow such extension, the procedure requires that the component must pass two consecutive LLRTs performed at least 12 months apart with a minimum of 12 months inservice time before the test *and* that the as-left test results do not follow any corrective action taken to reduce leakage of the component. In this case, while the first condition was met by satisfactory results of the two consecutive LLRTs on May 19, 1993 and May 21, 1994, the second condition was not met since the stem on the valve SWP-SOV 522D had been reworked on May 10, 1994. Therefore, the deferment of LLRT for SWP-SOV 522D was not justified. The valve SWP-SOV 522B is LLRT tested simultaneously with the valve SWP-SOV 522D due to the design configuration of these two valves.

#### Prefilters not included in the HVAC Testing

During the same STP review, it was also identified that the STPs for testing the Standby Gas Treatment System (SGTS), Fuel Building Ventilation System (FBVS), and Control Room Fresh Air System (CRFAS) did not meet the program plan of TS Section 5.5.7.d. TS Section 5.5.7.d states, "Demonstrate for each of the ESF systems that the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers is less than the value specified below when tested in accordance with Regulatory Guide 1.52, Revision 2, and ANSI N510-1989 at the system flow rate specified below  $\pm 10\%$ ." This wording was established during development of Improved Technical Specifications (ITS) and NUREG-1434, "Standard Technical Specifications - General Electric Plants, BWR/6. Upon further investigation, it was discovered that neither Regulatory Guide 1.52 nor ANSI N510-1989 require prefilter pressure drop testing. Neither the ITS submittal nor the NRC's Safety Evaluation Report (SER) identified such testing as being a new or more restrictive requirement. Discussion with the individuals involved with the ITS development both at RBS and other BWR-6's confirm this position.

Investigation revealed that review personnel failed to notice that NUREG -1434 wording had differed from the previous Technical Specification surveillance requirement wording. The prefilter pressure drop requirement had been added to the NUREG. This wording difference was also not detected during the review of the NRC approved license amendment. The prefilter pressure drop measurement requirement, therefore, remained in the ITS and it was later used for procedure changes. Note that prefilters perform no safety function in these systems. The personnel revising the STPs did not appropriately incorporate the TS change in two of the three procedures changed. The third procedure was unchanged. Prefilter pressure drop was not included in filter train STPs since it was not intended as a change during ITS implementation.

#### Drywell Airlock Leak Rate Testing Problems

Several significant test discrepancies were identified involving the leak rate tests performed on the Drywell Personnel Airlock Door Seal Air System (STP-057-7204) and the Drywell Equipment Hatch/Personnel Door Seal Pneumatic System (STP-057-7205). Also, in the Drywell Equipment Hatch/Personnel Door Seal Pneumatic System test (STP-057-7205), temperature compensation was not applied to the pressure measurements. This was the first performance of the procedures since they were revised. The test performers did not fully understand the acceptance criteria of the tests which resulted in

NRC FORM 366A (5-92)	U.S. NUCLEAR REGULATORY COMMISSION	APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95	
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		FACILITY NAME (1) <b>River Bend Station</b>	DOCKET NUMBER (2) <b>05000-458</b>

less than adequate test procedure completion. The temperature compensation guidance in procedure STP-057-7205 was ambiguous.

#### Root Causes:

Based on the investigations, the following causes were determined. The root causes are indicated by (R) and the contributing causes are denoted by (C).

#### Division 1 Station Service Battery Missed Surveillance:

- Surveillance test personnel had less than adequate understanding of the test acceptance criteria (R)
- Inappropriate change was made in the surveillance test procedure (R)  
Surveillance test result reviews did not detect the error (C)

#### HPCS Battery Missed Surveillance:

- Surveillance test personnel made incorrect assumptions and failed to consult Technical Specifications regarding the required battery testing (R)
- Insufficient guidance was provided in the STP program administrative procedure about alternate credit for surveillance tests (C)

#### STP for Valve LLRT Deferred Inappropriately

- Incorrect data entry in the surveillance test procedure (R)
- Surveillance test result reviews did not detect errors (C)
- Less than adequate review of testing and maintenance history of the service water valves (R)

#### Prefilters not included in the HVAC Testing

- Reviewers of TS amendment submittal package failed to identify the wording change in the related NUREG (R)
- Reviewers of the NRC approved license amendment failed to identify the unintended wording change (R)
- Revised procedures did not properly incorporate the TS change (C)

#### Drywell Airlock Leak Rate Test Problems

- Test personnel did not clearly understand the acceptance criteria of the procedure (R)
- Procedures were unclear on technical details (R)
- Pre-job briefing and training was not provided when the tasks had changed significantly in the revised procedures (C)
- Surveillance test results review did not detect the errors (C)

NRC FORM 66A (5-92)	U.S. NUCLEAR REGULATORY COMMISSION	APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95		
LICENSEE EVENT REPORT (LER) TEXT CONTINUATION		ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503		
		FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (5)
River Bend Station		05000-458	96-014-01	7 OF 9

### Corrective Actions:

#### Immediate Corrective Actions:

The plant was shut down to perform a missed surveillance on the Division I Station Service Battery. A Significant Event Response Team (SERT) was formed to investigate and determine the root causes of missed surveillances and recommend corrective actions. A Quality Assurance led multi-discipline team was formed to review 18 month frequency shutdown STPs, to verify the required technical specifications were met. The SERT team has completed their review and the results of their investigation are included in this LER. The following STPs were successfully reperformed:

- Division III HPCS Battery Service Test
- The LLRT test for the valve SWP-MOV503A
- The HVAC pressure drop tests including prefilters
- Leak rate tests for the Drywell Personnel Airlock Door Seal Air System and the Drywell Equipment Hatch and Personnel Door Seal Pneumatic System

The LLRT testing for the valves SWP-SOV 522B & SOV 522D was successfully reperformed on September 10, 1996, immediately after the missed surveillance was identified.

In addition, a change notice was incorporated to the Drywell Equipment Hatch/Personnel Door Seal Pneumatic System leak rate test to record 4 hour test data and provide a data sheet for the calculation of test results.

#### Specific Corrective Actions:

Accountability sessions are being held with the personnel involved in STP performance errors to emphasize management's expectations regarding STP performance and other appropriate work practices, and appropriate disciplinary actions are being taken.

Engineering personnel are reviewing test results of STPs with a frequency greater than one week to confirm that acceptance criteria are met. The Procedure Action Request (PAR) form will be improved to require a better basis for making procedural changes.

ADM-0015, Station Surveillance Testing Program, will be enhanced to add directions for taking alternate credit for the STP surveillances. Technical Specification knowledgeable personnel will be added for oversight of the station Surveillance Testing Program.

Data sheets will be developed to record complete history of "as found" and "as left" leak rate test results for all valves in the LLRT program in order to improve the review of maintenance history. A sampling of completed data sheets will be conducted to assure proper "as found" and "as left" data and associated maintenance history. Expectations for correct data entry, and complete and accurate technical reviews will be emphasized with personnel performing LLRTs.



NRC FORM 366A (5-92)	U.S. NUCLEAR REGULATORY COMMISSION	APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/96		
<p align="center"><b>LICENSEE EVENT REPORT (LER)</b> <b>TEXT CONTINUATION</b></p>		<p>ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST 50.0 HRS FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBS 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503</p>		
		FACILITY NAME (1) <b>River Bend Station</b>	DOCKET NUMBER (2) <b>05000-458</b>	LER NUMBER (6) <b>96-014-01</b>

Upon further evaluation and discussions with the BWROG Technical Specifications Committee and the other BWR Technical Specifications representatives, RBS concluded that a change to NUREG-1434 is not warranted. Therefore, testing of the HVAC filter trains in accordance with the criteria established in the TS section 5.5.7.d is being performed. The associated STPs have been revised to reflect this testing and the TS change will not be necessary. The TS-STP matrix is being validated. The procedure writer's guidance was evaluated for improvements and was found satisfactory.

A better method for performing containment and drywell airlock tests will be provided, specifically, providing a guidance for collecting trend data and calculating temperature compensation.

#### Corrective Actions addressing Generic Concerns

Departmental reviews of appropriate STPs will be conducted for compliance with acceptance criteria of the Technical Specifications, prior to test performances. QA will perform a follow-up assessment on the missed STP surveillances to assure appropriate implementation of the corrective actions. The TS-STP matrix and procedures will be validated. Technical Specifications and Bases training will be provided to enhance the Technical Specification knowledge of appropriate supervisors and engineering personnel. Management expectations regarding STP performance will be communicated to the personnel.

#### **Safety Significance:**

The systems affected by missed surveillances were retested and determined to be capable of performing their safety functions. Therefore, none of these conditions were safety significant.

#### Division I Station Service Battery

The battery performance test performed on July 17, 1996, showed the Division 1 Station Service Battery had sufficient capacity to perform its design basis requirements. The battery was operable and capable of performing its safety function.

#### High Pressure Core Spray Battery

The battery service test performed on July 18, 1996, showed the Division III battery had sufficient capacity to perform its design basis requirements. The battery was operable and capable of performing its safety function.

#### LLRT of Valve Deferred Inappropriately

Valve SWP-MOV503A is a primary containment isolation valve for the Service Water System. This valve was excluded from the scope of Local Leak Rate Testing during RF-6. The valve was successfully as-found tested during RF-3 and RF-4. Also, the valve had maintenance performed on it during RF-5 and was as-left leak rate tested. The regulatory documents committed to (10CFR50, Appendix J, Option B, Regulatory Guide 1.163 and NEI 94-01, "Industry Guideline for Implementing Performance Based Option of 10 CFR 50, Appendix J") allow extension of LLRT interval for valves passing two consecutive as-found LLRTs. In addition, the as-found data taken on July 17, 1996, met the leak rate acceptance criteria without any maintenance, indicating that the valve was capable of performing its safety function since RF-5.



NRC FORM 316A (5-92)	U.S. NUCLEAR REGULATORY COMMISSION	APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95		
LICENSEE EVENT REPORT (LER) TEXT CONTINUATION		ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNEB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503		
		FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)
River Bend Station		05000-458	96-014-01	9 OF 9

The other two containment isolation valves SWP-SOV 522B & SWP-SOV 522D for Service Water System were incorrectly excluded for Local Leak Rate Testing during RF-6. However, both valves were determined operable based on the following tests:

- Satisfactory leak rate test performed on September 10, 1996
- Satisfactory Standby Service Water Cold Shutdown Valve Operability Test (STP-256-6802) on February 5, 1996
- Satisfactory leak rate test performed on August 30, 1995 to determine air leakage through these valves into service water system at pressures much higher (120 psig) than the LLRT test pressures (8 psig)
- Satisfactory leak rate test performed during RF-5 on June 3, 1994

These satisfactory test results conclude that the valves were capable of performing their safety function since RF-5.

#### Prefilters not Included in the HVAC Testing

The prefilters were inadvertently added to the discussion in the TS Section 5.5.7.d during development of NUREG-1434 and ITS. There is no technical basis for including the prefilters in the pressure drop calculation. It was not an original testing requirement in the TS nor is it a part of Regulatory Guide 1.52, Rev. 2, or ANSI N510-1989. The latest testing conducted with the prefilter pressure drop included in the overall pressure drop of the filter train, met the Technical Specifications acceptance criteria. This satisfactory test performance indicates that the filter trains were capable of performing their safety functions and that the failure to include the prefilter as a part of the overall train pressure drop test during RF 6 did not affect the safety function of the train.

#### Airlock Test Problems:

One of the four inflatable seals on the drywell airlock is required to maintain the drywell safety function during a design basis accident (DBA). The remaining seals provide redundancy. Three seals were operable during the post RF-6 period, and thus the drywell airlock would have performed its safety function.

Tests performed during RF-6 on the Drywell Combination Equipment Hatch/Personnel Door Seal met the Technical Specification acceptance criteria. Therefore, after the test in RF-6, combination hatch would have successfully limited the leakage to the required Technical Specification values.

Note : Energy Industry Identification codes are identified in the text as (\*XX\*)