



GULF STATES UTILITIES COMPANY

April 27, 1990  
RBG-32748  
File Nos. G9.5, G15.4.1

Mr. Robert D. Martin  
Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76011

River Bend Station - Unit 1  
Docket No. 50-458/90-01

Dear Mr. Martin:

Gulf States Utilities (GSU) is pleased to provide its comments on your report of the Systematic Assessment of Licensee Performance (SALP) for River Bend Station (RBS) for the period October 1, 1989 through December 31, 1989. We appreciate the region's recognition of GSU's efforts to attain that level of superior performance that results in reduced NRC attention and welcome your insights into where our performance may be further improved. GSU believes there is no conflict between efficient, cost-effective operations and safe operations; in GSU's opinion the former necessarily leads to the latter.

#### SECURITY

GSU is committed to continued improvement in the security area. Specific management initiatives currently underway are being tracked to completion. GSU has increased its security audit frequency and the use of outside expertise in security management audits to self-identify needed improvements or hardware deficiencies that do not meet regulatory requirements. In reference to the weaknesses identified by the NRC and noted in the report, actions are currently underway to improve the capability of the intrusion detection system. Perimeter detection system equipment upgrades installed during the report period did improve system capability; however, deficiencies continued to exist after the upgrade completion. Therefore, additional modifications are being implemented to further improve the system.

9005040152 900427  
PDR ADDOCK 05000458  
Q PDC

LEAO  
110

Mr. Robert D. Martin  
April 27, 1990  
Page 2 of 6

A program has been developed and implemented which outlines progressive disciplinary actions to be taken for personnel who fail to properly follow security access control procedures. This program has resulted in a notable reduction in loggable events and a marked decline in personnel access errors.

Additional responsibility has been placed on shift supervision to provide increased oversight to ensure that shift problems are identified, addressed, and corrected. Security training continues to improve, and continued emphasis is being placed on uniformed security officer performance.

Increased quality assurance security program oversight continues. Two additional audits, which will review multiple aspects of the program, are scheduled for the calendar year 1990. Monthly surveillances are also being performed by QA, which monitor and report on various aspects of the security program. Independent security expertise continues to be utilized to augment this program.

Quality Improvement Program identified initiatives from the security officers and management support for upgrading security facilities, equipment and staffing continues to improve security performance and hardware system reliability. This program has established an environment where security personnel can be proactive in suggesting improvements.

We agree that a considerable improvement has been made in the security program. We also recognize that we must continue to improve the program through both long range planning and proactive management identifying and correcting problems in a timely manner. To achieve this goal, we will ensure that strict attention to detail is an integral part of normal performance and will continue to emphasize our commitment to excellence.

GSU is arranging for a management meeting at the earliest mutually convenient time to discuss security matters in further detail.

#### MAINTENANCE

GSU is aware of the Commission's emphasis on nuclear plant maintenance and believes strong programs have been developed at River Bend Station. To assure proper program implementation, GSU

Mr. Robert D. Martin  
April 27, 1990  
Page 3 of 6

maintenance has increased its attention to work activities through frequent inspection of work in progress. In addition, maintenance management began reviewing selected completed MWO packages to verify that personnel are providing required documentation of work activities. Problems noted during these inspections result in critiques involving the technicians, planners, foremen and supervisors, as required, to ensure that identified problems are corrected. It is expected that these inspections will have the effect of improved attention to detail and compliance with station programs.

Contracts for major outage work are being awarded at this time to permit earlier mobilization and indoctrination of contractors. During refueling outage 3 GSU will utilize a new computerized equipment tag-out system. Together, these initiatives will help improve contractor performance.

Recently all RBS managers have completed senior management directed meetings with management personnel down to the supervisor/foreman level stressing the importance of procedural compliance and the necessity to reduce the incidence of non-compliance. Procedure ADM-0028 has been revised to require a written explanation by workers for designating job steps as not applicable (N/A). The steps must also be initialled by the worker and reviewed by the maintenance foreman for concurrence. Maintenance personnel will be provided guidance on when to forward field identified problems to management for engineering disposition and root cause and failure analysis via the condition report program. The RBS training department is evaluating training needs for maintenance planners. GSU considers a strong maintenance program to be a key to reliable, safe operation and appreciates the NRC's assistance in identifying improvements that will result in our best performance.

#### ENGINEERING/TECHNICAL SUPPORT

In the engineering/technical support area, GSU recognizes the importance of procedural adherence, and the need for timely evaluation of safety issues. Engineering department training requirements have been clarified to assure needed training is provided. GSU intends to further improve the training of engineering/technical support personnel. GSU has set a goal in its Comprehensive Business Plan to finalize a training plan for engineering/technical support personnel by August, 1990.

A program is under development to evaluate and document system engineers' training and experience. The objective of this effort is to achieve certification of system engineers in accordance with INPO Good Practice 85-033, Use of System Engineers. The



Mr. Robert D. Martin  
April 27, 1990  
Page 4 of 6

program is a joint effort between the training department and the system engineering staff. Evaluation of engineering experience, training, needed training and education are underway. Qualification cards are well developed in most areas with some minor work remaining.

GSU plans to revise the modification procedure to increase the depth of design evaluations and the detail and completeness of documentation.

Two (2) methodologies for equipment availability and reliability trend analysis are undergoing an evaluation to complete definition of our overall program for reliability centered maintenance. These actions will further strengthen GSU's capabilities in technical support of the plant.

#### SAFETY ASSESSMENT/QUALITY VERIFICATION

Prompt evaluation of safety issues will continue to be stressed. Information Notices issued prior to 1989 that have not received complete engineering evaluations will be completed by September, 1990. The remainder will be reviewed for applicability, prioritized and scheduled for a complete review in a timely manner.

GSU's commercial grade dedication program has evolved and continues to evolve in accordance with industry initiatives. GSU is actively engaged in ongoing industry improvement in dedication of commercial grade components as more and more vendors cease to supply safety grade components. For example, within the past year the QA program has been changed to provide for surveys and inspections of commercial grade suppliers, equipment has been purchased, and other equipment is being upgraded for use in on-site commercial grade dedication testing. Site procedures have been revised to better reflect current industry guidelines for commercial grade dedication. The GSU RBS procedures and program currently reflect the guidelines contained in EPRI NP-5652 as endorsed by Generic Letter 89-02.

GSU's goal has been to perform both performance and compliance based QA audits. GSU continues to use technical specialists and is considering the use of an external training program to train GSU auditor and surveillance personnel to better enable them to conduct performance based audits. Additionally, audit and surveillance programs are being reviewed to determine if changes are required to address performance based audits.

GSU acknowledges the concern regarding the support by QA management of assessments provided by quality assurance

Mr. Robert D. Martin  
April 27, 1990  
Page 5 of 6

engineers. QA management attention has been focused to assure that assessments provided by quality assurance engineers are adequately supported. QA management has met with the Quality Assurance and Quality Control groups to reinforce the reliance

that management has in the expertise the QA engineers and QC inspectors have and that management fully intends to support their findings and take effective management action to produce corrective action. In addition, GSU has employed two independent QA consultants to evaluate the QA program and recommend improvements.

Additional reviews were performed of the deficiencies and corrective actions taken to close selected Quality Assurance Finding Reports. Root cause analysis and corrective actions taken were considered adequate for the types of deficiencies noted. However, because of the QA department's efforts to continue improvement in root cause analysis for quality related problems, QA directors, supervisors and engineers have received additional training in root cause analysis.

In continuing QA's effort to effect corrective action and subsequent finding closure in a timely manner, procedures are being reviewed for possible revision to include guidelines for management approval of the initially scheduled corrective action time frames. GSU is dedicated to return this category to a SALP 1 rating in the current evaluation period.

#### OTHER

GSU is pleased to have its efforts in Emergency Preparedness, Radiological Controls and Operations accorded the NRC's highest rating, Category 1. These areas represent GSU's first line defense of the health and safety of the public, the plant personnel and the plant. We will not be satisfied with the status quo in these areas, but will seek to strengthen them as well.

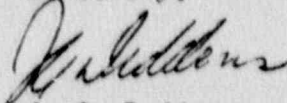
While the radiological controls personnel have effectively handled increasing plant source terms, I have directed the Source Term Task Force to report its recommendations to senior RBS management so that an aggressive approach to reducing the source term may be implemented. Since GSU's research has indicated common causal factors among our sister plants, at the executive level the BWR-6's have agreed to work together through the BWR-6 subcommittee of the Boiling Water Reactor Owners Group on generic source term improvement. GSU's Manager of Engineering will chair this particular subcommittee.

Mr. Robert D. Martin  
April 27, 1990  
Page 6 of 6

Finally, GSU is particularly pleased to be rated Category 1 in the area of Operations. GSU's policy is that safety comes first. Safe operations begin with conservative plant operations on a day-to-day basis; making the right decisions. GSU has initiated a six day crew rotation which will result in a decrease in the amount of overtime required for plant operators. Procedure adherence, professionalism in all aspects of operation and continued emphasis on attention to detail continue to be stressed.

GSU considers the SALP process and the NRC's recommendations as valuable insight and guidance in improving operations. We trust this will be as evident to your inspectors during the upcoming SALP period as it is to GSU management. Should you have any comments concerning this response please feel free to contact me.

Sincerely,



J. C. Deddens  
Senior Vice President  
River Bend Nuclear Group

JCD/LAE/pg

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

Mr. W. A. Paulson  
U. S. Nuclear Regulatory Commission  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852

NRC Resident Inspector  
Post Office Box 1051  
St. Francisville, LA 70775