



**GULF STATES UTILITIES COMPANY**

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April 7, 1982

RBG-12,421

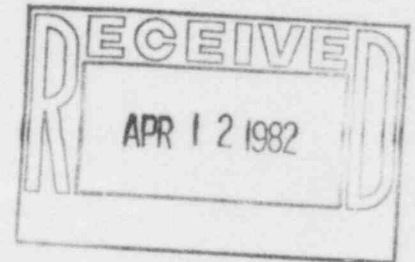
File No. G9.5, G9.25.1.1

G15.4.1

Mr. John T. Collins, Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region IV, Office of Inspection and Enforcement  
611 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76011

Dear Mr. Collins:

RIVER BEND STATION - UNIT 1  
REFER TO: RIV  
DOCKET NO. 50-458/REPORT NO. 82-04



This letter responds to the Notice of Violation contained in your I&E Report No. 50-458/82-04, as required by 10CFR2.201. The inspection was performed by Mr. Claude E. Johnson of your staff during the period February 22-26, 1982, of activities authorized by NRC Construction Permit CPPR-145 for River Bend Station, Unit 1.

The activity found not to be conducted in full compliance with NRC requirement was failure to follow storage procedures for structural steel fasteners. A Severity Level IV violation was assigned to the item of noncompliance.

A written statement is attached which explains the corrective steps taken and the date when full compliance was achieved.

Because the fasteners were stored pending reinspection before use or scrapping and slight safety significance, if any, was involved, Gulf States Utilities (GSU) requests that a lesser severity level be considered. GSU will be glad to discuss any further concerns you may have regarding this matter.

Sincerely,

W. J. Cahill, Jr.  
Senior Vice President  
River Bend Nuclear Group

WJC/LAE/jm

Attachment:  
Response to Notice of Violation

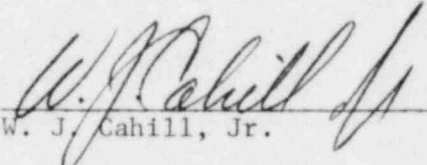
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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

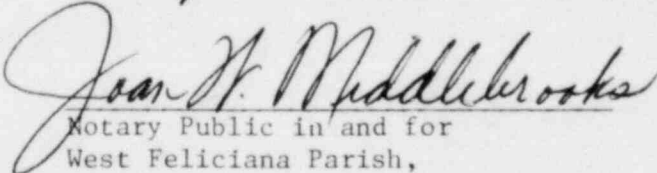
STATE OF LOUISIANA	I	
PARISH OF WEST FELICIANA	I	
In the Matter of	I	Docket Nos. 50-458 50-459
GULF STATES UTILITIES COMPANY	I	
(River Bend Station, Units 1 & 2)		

AFFIDAVIT

W. J. Cahill, Jr., being duly sworn, states that he is a Vice President of Gulf States Utilities Company; that he is authorized on the part of said Company to sign and file with the Nuclear Regulatory Commission the documents attached hereto; and that all such documents are true and correct to the best of his knowledge, information and belief.

  
W. J. Cahill, Jr.

Subscribed and sworn to before me, a Notary Public in and for the State and Parish above named, this 7<sup>th</sup> day of April, 1982

  
Notary Public in and for  
West Feliciana Parish,  
Louisiana

My Commission is for Life.

## ATTACHMENT

### RESPONSE TO NOTICE OF VIOLATION

#### Failure to Follow Storage Procedures for Structural Steel Fasteners

Criterion XIII of Appendix B to 10 CFR Part 50 requires that measures shall be established to control the handling, storage, shipping, cleaning, and preservation of material and equipment in accordance with work and inspection instructions to prevent damage or deterioration.

Stone and Webster Specification 210.310, Revision 3, "Structural Steel," states, "Fasteners may be stored outside on cribbing or pallets. Containers shall be covered with a waterproof cover so placed to allow adequate air circulation to limit condensation and prevent entrance of rain into the packaging. Care shall be taken when packages are opened that the material is protected from weather by canvas or other means during erection."

Contrary to the above:

On February 22, 1982, the NRC inspector inspected the storage conditions of Category I structural steel and fasteners. During the inspection, the NRC inspector observed that some A-325 bolts were uncovered to the environment. Some of the containers were opened and water had accumulated to the top of the containers. Some of the bolts had begun to rust.

This is a Severity Level IV violation. (Supplement II) (458/8204-01)

#### Cause

The bolts in question were unused bolts or bolts which had been retrieved from the immediate construction area. They were being stored temporarily pending a decision whether they should be sorted and used or sold as scrap. Gulf States Utilities believes it is significant that the bolts in question were not intended for direct use in the plant but rather, were in the process of being removed from the construction area.

#### Corrective Steps Taken

The black iron bolts were segregated from the galvanized bolts; water was removed from the containers. An enclosed corrugated metal building (level "C" structure) was erected specifically to house the black iron (A-325) bolts because of their susceptibility to oxidation. The galvanized bolts were allowed to remain outside, properly covered, and were stored in accordance with the applicable S&W storage specification (Specification 210.310). Holes were made in the base of the containers of the galvanized bolts to allow for drainage of condensate. All bolts were inspected by S&W QC personnel to determine their fitness for further use. All of the bolts were found to be acceptable. A lubricant (ED80) was applied to the bolts to remove surface corrosion and prevent future oxidation.

Corrective Steps Taken to Avoid Further Violations

Henceforth, all black iron bolts, retrieved from the field, are to be segregated from galvanized materials and stored indoors. In addition, such bolts are to be treated with a protective lubricant. Galvanized bolts, stored outside will be subject to periodic inspections to determine that such bolts are properly protected from the elements. All affected personnel have been informed of appropriate procedures.

Date When Full Compliance Was Achieved

March 16, 1982.