

GULF STATES UTILITIES COMPANY



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AREA CODE 504 635-6094 346-8651

August 3, 1990
RBG- 33339
File Nos. G9.5, G9.42

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

Gentlemen:

River Bend Station - Unit 1
Docket No. 50-458

Gulf States Utilities (GSU) Company submitted on March 21, 1988 (RBG-30380) an application to amend the River Bend Station - Unit 1 Technical Specifications. This change requested to remove the specification relating to snubbers to eliminate redundant requirements to the ISI program. As a result of discussions with the NRC staff during May and June of 1990 regarding that submittal, GSU is providing this letter to supplement that application to retain certain portions of the previous technical specification. This will allow the implementation of the currently approved ISI program and will eliminate redundant programs. A discussion of the proposed changes to specification 3/4.7.4 are contained in the enclosure.

Please contact Mr. L. L. Dietrich at (504) 381-4866 if additional information is required.

Sincerely,

W. H. Odell
Manager-Oversight
River Bend Nuclear Group

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

STATE OF LOUISIANA)

PARISH OF WEST FELICIANA)

In the Matter of)


GULF STATES UTILITIES COMPANY)

Docket No. 50-458

(River Bend Station - Unit 1)


AFFIDAVIT

W. H. Odell, being duly sworn, states that he is a Manager - Oversight for 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. H. Odell

Subscribed and sworn to before me, a Notary Public in and for the State and Parish above named, this 3rd day of August, 1990. My Commission expires with Life.



Claudia F. Hurst or Gladys B. Shelton
Notary Public in and for
West Feliciana Parish, Louisiana

ENCLOSURE

On March 21, 1990 GSU submitted a proposed change to the RBS technical specifications (RBG-30380). This change requested to remove the specification relating to snubbers to eliminate redundant requirements to the ISI program. As a result of discussions with the NRC staff during May and June of 1990 regarding that submittal, GSU now proposes to retain certain portions of the previous technical specification with the revisions indicated. This will allow the implementation of the currently approved ISI program and will eliminate redundant programs and certain restrictions contained in the license.

The proposed technical specifications as revised maintain the Limiting Condition for Operation (LOO), Applicability and ACTION requirements while only referencing the approved ISI Program in the Surveillance requirements. These changes will also state the action necessary to revise the ISI Program. The explanation of the proposed changes to specification 3/4.7.4 are discussed below for each insert of the attachment.

Discussion of insert 'A'

The addition of the word 'required' in the LIMITING CONDITION FOR OPERATION and ACTION statement is to limit this specification to only those snubbers that must be OPERABLE in the applicable operational mode(s) of the plant. The ACTION statement is also subdivided to delineate the time periods for the engineering evaluations previously required by item g to be completed. These evaluations are addressed in further detail by section 12.2.9 of the current ISI Plan and include:

An evaluation to decide if the system or component meets design requirements. This evaluation is required before returning the system or component to service. An evaluation that returns a required snubber to operation without removing it also must be completed within 72 hours of determining it inoperable or the system ACTION must be followed.

An evaluation of the snubber to determine the cause of failure. This evaluation is not required before returning the system or component to service unless the snubber is to be repaired and returned to service.

A failure mode evaluation to determine if snubbers of the same design are subject to the same failure. No evaluation is required before returning the system or snubber to service.

Discussion of insert 'B'

The basis for removal of the detailed surveillance requirements is the NRC review and approval of the ISI Program as discussed in the original submittal. This approval results in the specification creating a redundant program that also must be updated to maintain a consistent program.

The currently approved ISI Program meets or exceeds the examination requirements of OMa, Part 4, 1988 Edition, except for the visual examination frequency. The currently approved ISI Program allows for examinations of inaccessible snubbers at scheduled outages or shutdowns of sufficient duration to provide reasonable access to the snubbers. The justification for this schedule remains as originally submitted. The present RBS Technical Specification and OMa-4 1988 use the same visual examination frequency table which, based on the number of unacceptable snubber examinations, may require a plant shutdown to perform subsequent examinations of inaccessible snubbers at increased frequencies.

Research done by the Brookhaven National Laboratory has led to the development of a proposed outage-based visual examination table. This table is being considered for inclusion in future editions of OMa-4. The new table allows the examination period frequency to be extended up to 36 months with a percentage of failures. The RBS ISI Program only allows for a maximum period of 18 months with no failures therefore the ISI Program is clearly more conservative than the proposed table.

The ISI Program meets or exceeds the functional test requirements of OMa-4. One sample plan presently allowed by OMa-4, known as the "10%" plan, requires an initial sample size of at least 10% of each type of snubber to be tested each outage. The ISI Program also allows the 10% plan and is selected as the bases for the examination schedule. The actual examinations during the last two outages were over 16% of each type of snubber required to meet the ASME Section XI requirement of 100% snubber testing in a 10 year period, again exceeding OMa-4 requirements. The present OMa-4 only requires additional test lot sizes to be one half the size of the original sample. The present ISI Program additional sample lots are the same size as the initial samples thereby providing additional assurance of snubber operability.

Discussion of insert 'C'

Since 3/4.7.4 will remain in the RBS Technical Specification, the BASES will remain with the proposed modifications. These changes will reference the approved ISI Program instead of specific specification requirements.

As discussed above this change will not result in a change to the presently approved ISI Program. As currently written, the present technical specifications may result in unnecessary administrative and operational restrictions. Based on that, GSU requests the review of this change be completed before the refueling outage presently scheduled to begin September 28, 1990. Because the revisions proposed in this letter are conservative to those proposed in the original request and in the approved ISI program, GSU proposes that these changes do not result in a significant hazard to the public.

ATTACHMENT

INSERTS FOR SPECIFICATION 3/4.7.4 ,SNUBBERS

INSERT A

Action statement under LIMITING CONDITION FOR OPERATION changed to read as follows:

- A. With one or more required snubbers inoperable on a system, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status or declare the attached system inoperable and follow the appropriate ACTION statement for that system.
- B. Perform engineering evaluations per the applicable section of the approved ISI Program.

INSERT B

SURVEILLANCE REQUIREMENTS changed to read as follows:

4.7.4 Each snubber shall be demonstrated to be OPERABLE by implementing the examination and test requirements of the approved ISI Program and as indicated in Specification 4.0.5. Only a previously approved revision of the ISI Program may be implemented. Subsequent revisions to the program shall be submitted to the NRC in accordance with the requirements of 10CFR50.55a(g).

INSERT C

The following shall be inserted in section 3/4.7.4 SNUBBERS paragraph 3 of the BASES as indicated:

...maintained in accordance with the ISI Program.