



GULF STATES UTILITIES COMPANY

July 17, 1991
RBG-35,328
File Nos. G9.5, G15.4.1

U.S. Nuclear Regulatory Commission
Region IV - Regional Administrator
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

Gentlemen:

River Bend Station - Unit 1
Docket No. 50-458/91-15

Pursuant to 10CFR2.201, this letter provides Gulf States Utilities Company's (GSU) response to the Notice of Violation for NRC Inspection Report No. 50-458/91-15. The inspection was conducted June 3-7, 1991, of activities authorized by NRC Operating License NPF-47 for River Bend Station - Unit 1 (RBS). GSU's reply to the violation is provided in the attachment.

Should you have any questions, please contact Mr. L.A. England at (504) 381-4145.

Sincerely,

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

AE PDG GAB DNL JWC JCM/kvm
LAE/PDG/GAB/DNL/JWC/JCM/kvm

Attachment

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

NRC Resident Inspector
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St. Francisville, LA 70775

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91-1261

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

STATE OF LOUISIANA)

PARISH OF WEST FELICIANA)

Docket No. 50-458


In the Matter of)

GULF STATES UTILITIES COMPANY)


(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 17th day of July, 1991. My Commission expires with Life.


Claudia F. Hurst
Notary Public in and for
West Feliciana Parish, Louisiana

ATTACHMENT

REPLY TO NOTICE OF VIOLATION 50-458/91-15 LEVEL IV

REFERENCE

Notice of Violation - Letter from S.J. Collins to J.C. Daddens, dated June 18, 1991.

VIOLATION

River Bend Station Technical Specification 3.6.5.2 states that secondary containment integrity-fuel building shall be maintained.

River Bend Station Technical Specification 4.6.5.2 requires that secondary containment integrity-fuel building shall be demonstrated within 24 hours prior to the handling of irradiated fuel in the fuel building.

Gulf States Utilities' Surveillance Test Procedure-000-0103, "Irradiated Fuel Handling in Fuel Building," is the governing procedure that implements the Technical Specification 4.6.5.2 surveillance requirements.

Contrary to the above, on June 4, 1991, the licensee discovered that it had handled Irradiated Fuel Bundle LYH845, without first demonstrating secondary containment integrity-fuel building by performing Procedure STP-000-0103 within the prior 24 hours.

REASON FOR THE VIOLATION

The procedures used during this evolution provided inadequate guidance to assure the requirements of Technical Specification (TS) 3.6.5.2 were met. These procedures included REP-0010, Special Nuclear Material (SNM) Movement, Control and Accounting; FHP-0007, Use of Fuel Preparation Machines; and FHP-0002, Fuel Handling Platform Operation. The lack of checklists, coupled with the duration of the work, led the Shift Supervisor to assume that all pertinent requirements had been met during preparations made in previous shifts. A contributing factor was that this was the first time that fuel movement had been performed when the plant was not in a refueling outage (Operational Condition 5). GSU had previously conducted reviews to ensure that TS surveillances were included in associated procedures and in the surveillance test procedure (STP) event related matrix. However, because fuel is normally moved in Operational Condition 5, a specific event matrix for Operational Condition * (Handling of Irradiated Fuel in the Fuel Building) was not produced.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

The following corrective actions were taken:

1. Fuel handling operations were stopped and the surveillance under TS 4.6.5.2 was performed and found acceptable.
2. A review of Technical Specifications was performed identifying 12 limiting conditions for operation associated with Operational Condition * (Handling of Irradiated Fuel in the Fuel Building). An independent review of these Technical Specifications was performed to verify that all other requirements were satisfied prior to fuel movement.
3. Procedure FHP-0007, Use of Fuel Preparation Machines, was revised to add a prerequisite requiring Secondary Containment Integrity - Fuel Building per TS 3.6.5.2.
4. Procedure FHP-0002, Fuel Handling Platform Operation, was revised to add a step for senior reactor operator (SRO) verification of the Technical Specification requirements prior to the handling of irradiated fuel.
5. Procedure REP-0010, Special Nuclear Material (SNM) Movement Control and Accounting, was revised to incorporate a checklist with sign-offs by a reactor engineer and an SRO which includes verifying the surveillance requirement of TS 3/4.6.5.2 prior to handling irradiated fuel in the fuel building. Shift Supervisor review and approval is required prior to fuel handling.
6. All of the operating crews were briefed by the Assistant Plant Manager - Operations, Radwaste and Chemistry on the significance of the missed surveillance and the importance of attention to detail.
7. The event was reported as required by 10CFR50.73 in LER 91-011.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

To prevent recurrence of this problem, the following action will be taken: The STP matrix will be revised to include an event-related matrix for Operational Condition *. This matrix will include all Technical Specification surveillances required prior to moving irradiated fuel in the fuel building regardless of the plant operational condition.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved with the completion of surveillances required by TS 4.6.5.2 prior to the resumption of fuel movement. Additional corrective actions will be completed by September 30, 1991.