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October 28, 1994

BY HAND DELIVERY

Mark J. Wetterhahn, Esq.
Winston & Strawn
1400 L Street, N.W.
Washington, DC 20005

Re: Gulf States Utilities Company, (River Bend
Station), NRC Docket No. 50-458-OLA

Dear Mr. Wetterhahn:

Enclosed please find additional discovery requests on
the Long-Term Performance Improvement Plan (LTPIP), as referenced
in my letter of October 26, 1994.

Please call if you have any questions.

Sincerely,

Tom Rudebusch

Thomas L. Rudebusch

cc: Honorable B. Paul Cotter, Jr. (by mail)
Honorable Peter S. Lam (" ")
Honorable Richard F. Cole (" ")
Marian L. Zobler, Esq. (" ")
Robert B. McGehee, Esq. (" ")

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of)
)
GULF STATES UTILITIES COMPANY, et al.)
)
River Bend Station, Unit 1)
)

'94 NOV -1 AIG:24

Docket No. 50-458-OLA

FOLLOW-UP DISCOVERY REQUESTS OF
CAJUN ELECTRIC POWER COOPERATIVE, INC.,
TO GULF STATES UTILITIES COMPANY,
ENTERGY OPERATIONS, INC., AND ALL AFFILIATED COMPANIES

The general instructions and definitions from Cajun's first request continue to apply to all discovery requests set forth herein.

The following discovery requests relate to the River Bend Station Long-Term Performance Improvement Plan (LTPIP), Rev 2 dated September 15, 1994.

2-6.53 Process development - Item 2.2.5, Page 23

Item 2.2.5 of the Process Development portion of this strategy discusses a project closeout critique and closeout critique form to be used by project managers to provide feedback to River Bend management. The schedule indicates this activity is 50% complete. Please identify and describe the Critique Forms and information generated to date.

2-6.54 Develop self-assessment capability - Item 8.1.2, Page 62

Item 8.1.2 establishes a methodology to determine where to focus internal and external assessment resources and develops an assessment schedule. This activity is shown as complete in the 1st quarter of 1994. Please identify, describe and provide the methodology established as well as the schedule for assessments. Also, identify and describe any documents related to assessments completed to date based on the schedule developed.

2-6.55 Develop effective oversight processes for problem solving systems - Item 8.2.1.4 and 8.2.1.5, Page 62

Items 8.2.1.4 and 8.2.1.5 discuss the revision of the Performance Monitoring Management Report to provide more effective trend information for executive decision making and action plan development and provide analysis results to senior management. The schedule shows these activities

as complete in the third quarter of 1994. Please identify and describe the changes made to the Performance Monitoring Report as a result of this activity. Please provide the analysis results provided to senior management (shown as 9/3/94).

2-6.56 Improve the Supervisory Effectiveness to Minimize Rule/Knowledge - Based Errors - Item 9.5.1.1, Page 69

The referenced item indicates Field Surveillance (Plant Observations) will be conducted to improve performance in this area. Please identify and describe the data and observations generated by this activity to date. Please indicate the number of tours made to date, the average time spent on these tours and as follow-up to these tours, and the level of management and functional areas of responsibility of the individuals involved in these tours.

2-6.57 PERFORMANCE MEASURES - Page 76

The performance measures identified on page 76 for work control provides performance goals. Please identify, describe, and provide data to indicate monthly performance in each of these areas from January 1993 to the present. Please provide additional information regarding performance in meeting these goals on a monthly basis as the program implementation proceeds.

2-6.58 Improve Preventive and Predictive Maintenance Performance - Item 10.4.4, Page 80

Item 10.4.4 indicates periodic assessments of the PM program effectiveness in accordance with the Maintenance Rule requirements are scheduled to be conducted starting early in the 3rd Quarter of 1994. How many assessments of the PM program have been completed to date? Please identify and describe all documentation generated by this activity to date. Please provide copies of assessment reports associated with this activity as they are completed.

2-6.59 PERFORMANCE MEASURES - Page 84

The performance measures identified on page 84 for materials management specify a performance goal of 50 or less priority 1, 2, or 3, MWO's awaiting parts. Please identify, describe, and provide data to indicate monthly performance in this area from January 1, 1993 to the present. Please provide additional information regarding performance in meeting this goal on a monthly basis as the program implementation proceeds.

2-6.60 PERFORMANCE MEASURES - Page 91

The performance measures identified on page 91 for modifications provides performance goals. Please identify, describe, and provide data to indicate monthly performance in each of these areas from January 1, 1993 to the present. Please provide additional information regarding performance in meeting these goals on a monthly basis as the program implementation proceeds.

2-6.61 PERFORMANCE MEASURES - Page 96

The performance measures identified on page 96 for procedures provides performance goals. Please identify, describe, and provide data to indicate monthly performance in each of these areas from January 1, 1993 to the present. Please provide additional information regarding performance in meeting these goals on a monthly basis as the program implementation proceeds.

2-6.62 Complete the actions of the NTPIP - Pages 105 & 106

- (a) Drawing upgrade project - NTPIP Item 7.1.4 indicates a target date of 3/31/94 for completion of this activity. Identify and explain the safety significance, challenge to the plant operators, or impact on the quality of maintenance caused by the delay in completing these activities.
- (b) Vendor technical manuals - NTPIP Items 7.2.6 and 7.2.7 indicate a target date of 4/30/94 and 3/31/94 for completion of these activities. Identify and explain the safety significance, challenge to the plant operators, or impact on the quality of maintenance caused by any delay in completing these activities.

2-6.63 Backlog of plant support open items - the NTPIP scope was to process the following numbers of high priority open items through engineering:

- (a) 43 Maintenance Work Orders - NTPIP Item 7.3.1.2 indicates a target date of 3/30/94 for completion of this or a similar activity. Identify and explain the safety significance, challenge to the plant operators, or impact on the quality of maintenance caused by the delay in completing these activities.
- (b) 30 Condition Reports - NTPIP Item 7.3.2.4 indicates a target date of 4/30/94 for completion of this or a similar activity. Identify and explain the safety significance, challenge to the plant operators, or

impact on the quality of maintenance caused by the delay in completing these activities.

- (c) 30 Field Worked Modification Requests - Please identify and describe the work and Modification Requests and explain why they are not found in Rev. 1 of NTPIP.
- (d) 150 Procurement Engineering Requisitions - NTPIP Item 7.3.5.3 indicate a target date of 4/30/94 for completion of this or a similar activity. Identify and explain the safety significance, challenge to the plant operators, or impact on the quality of maintenance caused by the delay in completing these activities.
- (e) NSSS drawing problems - NTPIP Item 7.3.4.1 indicates an actual completion date of 10/20/93 for this or a similar activity. Please explain why this activity is in the LTPIP if it was reported as completed in Rev. 1 of the NTPIP. If not complete, identify and explain the safety significance, challenge to the plant operators, or impact on the quality of maintenance caused by the delay in completing these activities.

2-6.64 Improve usability and accuracy of design documents:

- (a) Upgrade seventeen high priority vendor skid P&IDs requiring additional mark numbers - NTPIP Item 7.4.1.3 indicates a target date of 3/31/94 for completion of this or a similar activity. Identify and explain the safety significance, challenge to the plant operators, or impact on the quality of maintenance caused by the delay in completing these activities.
- (c) Update on-line Bill of Materials database with approximately 500 items - Please explain why this matter is not found in Rev. 1 of NTPIP.
- (d) Update approximately 400 high priority Loop Calibration Reports - NTPIP Item 7.4.4.4 indicates a target date of 4/30/94 for completion of this or a similar activity. Identify and explain the safety significance, challenge to the plant operators, or impact on the quality of maintenance caused by the delay in completing these activities.

2-6.65 Update fire safe shutdown analysis - NTPIP Item 7.5.1.3 indicates an actual completion date of 11/30/93 for this or a similar activity. Why is this activity in the LTPIP if it was reported as completed in Rev. 1 of the NTPIP? If not complete, identify and explain the safety significance, challenge to the plant operators, or impact

significance, challenge to the plant operators, or impact on the quality of maintenance caused by the delay in completing this activity.

2-6.66 Evaluate the configuration management issues to ensure the design drawings accurately reflect the updated physical plant - NTPIP Item 7.8.1 indicates a target date of 2/15/94 for completion of this or a similar activity. Identify and explain the safety significance, challenge to the plant operators, or impact on the quality of maintenance caused by the delay in completing these activities.

2-6.67 Establish an Engineering Review Committee - NTPIP Item 7.9.1 indicates an actual completion date of 12/1/93 target date for this or a similar activity. Why is this activity in the LTPIP if it was reported as completed in Rev. 1 of the NTPIP? If not complete, identify and explain the safety significance, challenge to the plant operators, or impact on the quality of maintenance caused by the delay in completing these activities.

2-6.68 Item 14.2.2.7, Page 108

This activity involves the review of the backlog of approximately 5,000 LCR's awaiting engineering update, and revise as appropriate. This activity was scheduled from 2/1/94 through 9/15/96. However, the September 15, 1994 issue of the LTPIP, Rev. 2 indicates that this activity is complete. If this activity is completed, please indicate if any reportable events were identified as a result of this review. Were any calibration changes identified as a result of this review? Identify and explain any reportable events or significant calibration changes caused by this review.

2-6.69 Item 14.2.7.1.1, Page 113

This activity involves the performance of an INPO assist in Engineering Support to focus on Systems Engineering. This assist visit is shown as complete on the schedule. Please identify and explain the findings and recommendations made by INPO as a result of this visit.

2-6.70 Item 14.2.7.1.2, Page 113

This activity involves the performance of an SSFI-type assessment to evaluate the need to enhance aspects of the design basis/configuration management process. The schedule shows that this assessment is in progress. Please identify and explain any reportable events

resulting from this SSFI and the findings and recommendations identified by this assessment when it is completed.