

GULF STATES UTILITIES COMPANY

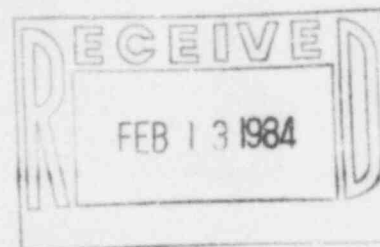
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February 6, 1984
RBG- 16,955
File No. G9.5, G15.4.1

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 83-20

This letter is in response to the notice of violation contained in I&E inspection report no. 50-458/83-20. The inspection was conducted at the River Bend Station construction site by Mr. D. D. Chamberlain during the period October 17, 1983 through November 3, 1983 of activities authorized by NRC construction permit CPPR-145 for River Bend Station - Unit 1.

Gulf States Utilities Company's (GSU) response to the notice of violation is provided in the attachment to this letter. We will be glad to discuss any further comments that you may have concerning the enclosed response.

Sincerely,

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

WJC/LAE/je

Attachments

8403130448 840308
PDR ADDCK 05000458
Q PDR

Attachment

Response to Notice of Violation

Reference

Notice of Violation - E. H. Johnson Letter to W. J. Cahill dated January 5, 1984.

Refer To: Docket 50-458/83-20
"Failure to Follow Procedures"

Response

Gulf States Utilities' (GSU) program for writing operating procedures utilizes the general information in the FSAR and also relies upon specific applicable design information. This program requires that references used in operating procedure preparation be listed and reviewed for revision prior to approval and use of the procedure.

As noted by the NRC Inspector, FSAR information concerning diesel generator loading was out of date when compared to the cognizant Stone & Webster (S&W) engineer's calculations. The S&W engineer had not complied with the S&W procedure for updating the FSAR. It should also be noted that the related operating procedure for the diesel generator had not been written, and that the FSAR change was to be made in response to a Nuclear Reactor Regulation (NRR) Power Systems Branch (PSB) question 430.24.

GSU Quality Assurance performed a surveillance of activities associated with the identification and incorporation of design changes into the FSAR on December 20, 1983 through December 22, 1983, at the S&W Cherry Hill Operations Center. No deficiencies were identified related to following existing procedures for communication of design information to GSU.

The General Electric Company program for transmitting operations related design information to GSU is considered adequate.

Corrective Actions Taken and Results Achieved

To address the specific concern that prompted the NRC finding, S&W Letter No. RBS-9116 dated December 14, 1983 provided to GSU the information from diesel generator loading calculation No. 12210-E-122, Revision 2 (approved December 7, 1983) needed for incorporation into plant operating procedures. In addition, the FSAR has been changed via approval Change Notice F8.3.9, Revision 1, to accurately reflect this loading calculation. This change notice will be incorporated in FSAR Amendment 12.

Corrective Action Taken to Avoid Further Violations

A new S&W River Bend Procedure (RBP) 6.23 has been issued instructing responsible S&W engineers to notify GSU (the Plant Manager) by letter if, during preparation and revision of the RBS technical specifications, they identify any safety-related calculation assumptions that are important regarding plant operation. The Plant Manager will provide the information to the Administrative Supervisor who will provide this information to the appropriate procedure writers.

All S&W electrical division calculations with potential impact on the FSAR and plant operating procedures have been reviewed to ensure consistency with the FSAR and to ensure that no further condition similar to that described in the notice of violation exists.

An audit of S&W Category I calculations in the Structural, Power, Nuclear Technology, Engineering Mechanics and Controls Divisions was conducted by S&W Engineering Assurance from December 20, 1983 through January 10, 1984. The calculation audited were selected for their potential impact on the FSAR and operating procedures. The audit focused on calculation assumptions requiring action on the part of GSU to ensure the validity of the assumption. No other condition similar to that described in the notice of violation was found in the sample of calculations reviewed.

RBP 6.23 was issued on November 15, 1983. In accordance with this procedure, GSU was provided a copy of the updated calculation on December 14, 1983 (S&W Letter No. RBS-9116). GSU worked with S&W to clarify RBP 6.23 requirements.

Direction has been given by memorandum to the Administrative Supervisor to provide any information transmitted by S&W under RBP 6.23 to the appropriate procedure writers. Also, GSU administrative procedure, ADM 0003, that describes the procedure preparation process is being clarified to provide further guidance concerning the utilization of references as procedure inputs.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

STATE OF TEXAS

X

COUNTY OF JEFFERSON

X

In the Matter of

X

Docket Nos. 50-458
50-459

GULF STATES UTILITIES COMPANY

X

(River Bend Station,
Units 1 and 2)

AFFIDAVIT

W. J. Cahill, Jr. being duly sworn, states that he is a Senior 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.
W. J. Cahill, Jr.

Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 7 day of February, 19 84.

Barbara A. Burns
Notary Public in and for
Jefferson County, Texas

My Commission Expires:-

2/10/85