



GULF STATES UTILITIES COMPANY

RIVER BEND STATION

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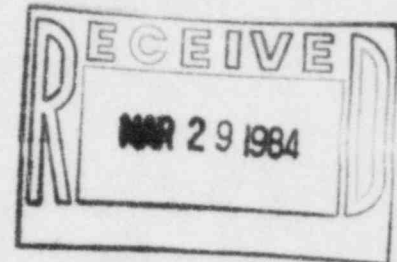
AREA CODE 504

635-3237

387-4257

March 23, 1984
RBG- 17,386
File Nos. 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, Texas 76011



Dear Mr. Collins:

River Bend Station Unit 1
Refer to: RIV
Docket No. 50-458/Report 83-22

This letter is in response to the Notice of Violations contained in I&E Report No. 50-458/83-22. The inspection was conducted at the River Bend Station construction site by Mr. D. D. Chamberlain during the period December 1, 1983 through January 31, 1984, of activities authorized by the NRC Construction Permit No. CPPR-145 for River Bend Station Unit No. 1.

Gulf States Utilities' response to the Notice of Violations 83-22-01, "Failure of Followup Action" and 83-22-03, "Failure of Document Control Program", is provided in the enclosed attachment. This completes GSU's response to the Notice of Violations.

Sincerely,

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

WJC PJD
WJC/PJD/df

Attachment

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PDR ADDCK 05000458
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ATTACHMENT

Response to Notice of Violation

Reference

Notice of Violation - E. H. Johnson letter to W. J. Cahill dated February 22, 1984.

Refer to: Docket 50-458/83-22

A. Failure of Followup Action (83-22-01)

Response

Corrective Steps Which Have Been Taken And The Results Achieved

A follow-up has been performed for the examples of delinquent responses/corrective action for Quality Assurance Finding Reports. The result of this follow-up is as listed below:

1. Operations Audit of Measuring and Test Equipment (M&TE) 83-P-002
 - a. P-83-07-01-D - Procedures have been issued to implement corrective action for this finding. Corrective action has been verified by QA. This item was CLOSED, March 14, 1984.
 - b. P-83-07-04-D - Corrective action in the form of revised procedures has been completed. Quality Assurance will verify implementation of revised procedures.
2. Warehouse Storage and Maintenance Audit 83-P-009
 - a. P-83-09-02-D - A revised response dated March 08, 1984 was received indicating that implementing procedures will be in-place by April 15, 1984.
 - b. P-83-09-03-D - Implementation is incomplete. A new response is being prepared to establish a new corrective action due date.
 - c. P-83-09-04-D - A procedure was issued March 05, 1984 to implement corrective action. Quality Assurance will verify implementation of procedures by May 01, 1984.
 - d. P-83-09-07-D - Corrective action has been completed. Training on Material Handling will begin on March 01, 1984. Quality Assurance will verify implementation as training progresses.
 - e. P-83-09-08-D - A revised response dated February 03, 1984 was received. A procedure has been revised. Training will begin

March 01, 1984. Quality Assurance will verify implementation as training progresses.

- f. P-83-09-09-E - A revised response dated January 28, 1984 was received. Requirements have been incorporated into the appropriate procedure and issued. Quality Assurance will verify implementation as training progresses.
 - g. P-83-09-10-D - A revised response dated February 03, 1984 was received. Training will begin March 01, 1984. Quality Assurance will verify implementation as training progresses.
 - h. P-83-09-13-D - A procedure draft is scheduled to be out for comment March 12, 1984. Quality Assurance follow-up is expected by April 02, 1984.
- 3. Procurement Document Control Audit 83-P-010 - Delinquent responses have been received from the audited organization and corrective action dates have been specified. QA is evaluating the responses.
 - 4. Integrated Test Program Audit 83-P-011 - Delinquent responses have been received from the audited organization and corrective action dates have been specified. QA is evaluating the responses.

The Director-Quality Assurance has issued instructions on QA Letter GSU QA-1230, dated March 16, 1984, directing Quality Assurance personnel to review all open findings and take action as necessary to obtain timely responses to audit reports and assure that corrective action dates are specified on audit responses.

The Assistant Plant Manager-Services has assigned the responsibility for tracking, statusing, and reviewing Plant Staff's corrective action responses of Quality Assurance Finding Reports to the Administrative Supervisor. Audit Findings have been given priority consideration concerning timely responses and corrective action.

Corrective Steps Taken To Avoid Further Violations

Administrative Procedure, ADM-0012, "Corrective Action Systems" will be issued March 30, 1984, delineating responsibilities and methods for Plant Staff to assure timely corrective action is taken for identified deficiencies. A Corrective Action Coordinator has been assigned to further implement this procedure to assure that all findings are statused and corrective action dates are met.

GSU Quality Assurance has added the section "Action Pending" to the Monthly Quality Assurance Finding Status Report. This section indicates the action remaining to be taken and the expected completion date. This will enhance the visibility of open deficiencies and provide more awareness of necessary action to the auditing organization as well as the audited organization.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved by May 01, 1984.

B. Failure of Document Control Program (83-22-03)

Response

Corrective Steps Which Have Been Taken And The Results Achieved

The subject violation addresses the inability of the RBS I&C M&TE Issue Facility to retrieve and identify 25 percent of the files maintained for 1983. A subsequent review provided retrieval and identification for all but 2 of 93 Out Of Tolerance forms. At the time of the inspection, the I&C Section had already recognized the need to upgrade the "Out of Tolerance Notification" (OTN) system, and was in the process of improving the OTN log and filing system. During the inspection, the files were inventoried and all but two of the documents in question were retrieved. The missing documents, 83-OCN-047 and 83-OCN-054, were reinitiated, reissued, and cleared in accordance with a revised procedure, MSP-0006, "Disposition of Measuring and Test Equipment (M&TE) at the I&C Issue Facility; Out of Service M&TE and Standards and Lost M&TE", Revision 1, dated March 01, 1984. Review of the OTN's against completed work indicated that neither OTN impacted the work or plant testing. Additionally, the filing system has been consolidated in a separate file by notification number for ease of retrievability. A complete review of the OTN files has been completed by the I&C Section, and no other problems were identified.

Corrective Steps Taken To Avoid Further Violations

The procedure, MSP-0006, was revised to describe and clarify the use of the "Out of Tolerance Notification" form and log. With regard to traceability, the new OTN log provides the necessary information to assure that the OTN is tracked, and the status identified. This information includes the M&TE identification number, the person issued to, the date issued, and the date completed. To assure that overdue OTN's are identified, the log is checked on a weekly basis. All personnel of the M&TE Issue Facility have been instructed on the mechanics of the "Out of Tolerance Notification" system, and a dedicated individual has been given the responsibility for assuring that the system is properly implemented. Additionally, a step by step instruction on how to fill out the OTN has been placed in front of the OTN log to assure that I&C personnel are aware of the process.

Date When Full Compliance Was Achieved

Full compliance in correcting the discrepant condition was achieved March 8, 1984.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

STATE OF LOUISIANA

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PARISH OF WEST FELICIANA

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In the Matter of

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Docket Nos. 50-458
50-459

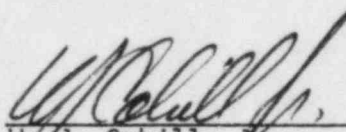
GULF STATES UTILITIES COMPANY

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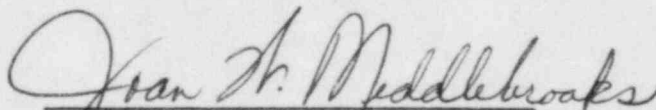
(River Bend Station,
Units 1 & 2)

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 23 day of March, 1984.


Joan W. Middlebrooks
Notary Public in and for
West Feliciana Parish,
Louisiana

My Commission is for Life.