GULF STATES UTILITIES COMPANY

RIVER BEND STATION POST OFFICE BOX 220 ST. FRANCISVILLE, LOUISIANA 70775

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U.S. Nuclear Regulatory Commission
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Washington, D.C. 20555

Gentlemen:

River Bend Station - Unit 1
Docket No. 50-458/90-02

This letter updates certain corrective actions identified in the supplement to Gulf States Utilities Company's (GSU) response dated March 12, 1991, to the Notice of Violation for NRC Inspection Report No. 50-458/90-02. The inspection was conducted by Messrs. Johnson, Singh and Murphy during the period of January 22 - 26, 1990, of activities authorized by NRC Operating License NPF-47 for River Bend Station - Unit 1 (RBS). The status of the corrective actions 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

LAE/PDG/FRC/JCM/JRH

Attachment

cc: U.S. Nuclear Regulatory Commission
Region IV - Regional Administrator
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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)

(River Bend Station - Unit 1)

Docket No. 50-458

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 7th day of February, 1992. My Commission expires with Life.

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

ATTACHMENT

In response to the violation identified in the Notice of Violation for NRC Inspection Report No. 50-458/90-02, GSU has undertaken a comprehensive review and documentation of the Fire Hazards Analysis (FHA). In January, 1990, Design Engineering completed an initial review of the FHA. From January 1 to February 7, 1990, Quality Assurance performed a Safety System Functional Inspection (SSFI) as related to the energized valves identified in the violation. The mini-SSFI identified several recommendations which were implemented by March 8, 1990. A final review of the FHA by an independent contractor was completed in January, 1991. During the final review of the FHA, 106 discrepancies (previously reported as 107) were identified which required further evaluation. These discrepancies were prioritized for immediated corrective actions based on potential safety significance. Of the 106 discrepancies, 23 were identified as potentially affecting Pre-fire Strategies, Appendix R separation, or the USAR. These 23 items were reviewed and corrective actions identified by April 15, 1991. Corrective actions identified for 22 of the 23 items are considered enhancements, not required for compliance with Appendix R, and involve changes to the FHA, USAR, pre-fire strategies, procedures or design documents. The only safety significant item involved fire areas where potential fire damage could be postulated to cause loss of reactor core isolation cooling (RCIC). RCIC is used for vessel level control in Method 1 Safe Shutdown Methodology as identified in GSU's FHA. Analysis has shown that alternate equipment, free of fire damage, is available in each of these fire areas to ensure safe shutdown capability.

Evaluations for the remaining 83 items were completed prior to January 24, 1992. Of the 83 items evaluated, 12 required no corrective actions. Sixty-one of the items involve corrective actions which are considered enhancements. Actions have already been taken to implement several of these enhancements. The remaining 10 items can be grouped into four basic catagories: Breaker/Fuse Coordination, Appendix R Separation Concerns, New Fire Area/Prefire Strategies Deficiencies, and Multiple High Impedence Faults. These four categories are discussed individually below.

Breaker/Fuse Coordination

A specific short circuit analysis for the protection and coordination of 125 VDC and 120 VAC control circuits was not performed. GSU has decided to perform such an analysis and develop a single source document to enhance control of breaker/fuse coordination for these control circuits. The analysis is scheduled to be completed and design improvements, if required, identified by October 30, 1992.

Appendix R Separation Concerns

Three areas were identified where compliance with Appendix R separation criteria, as identified in the FHA and/or USAR, was not provided. Two of the areas, the main control room and a fire area in the fuel building, involved equipment required for spent fuel pool cooling only and not equipment required for safe shutdown of the reactor vessel. In both cases immediate actions were taken and administrative controls implemented to address the concerns with spent fuel pool cooling until permanent corrective actions can be identified and implemented. Permanent

corrective actions for these two areas will be identified by March 31, 1992.

The third area is in the reactor containment building. Containment cooling could be lost due to potential fire damage in this fire area since separation, in accordance with Appendix R, Section G requirements is not provided. The affected raceways were treated as having missing fire barriers and fire watch requirements specified in Technical Specification 3/4.7.7, "Fire Rated Assemblies" were implemented. Permanent corrective action for this concern will be identified by March 31,1992.

New Fire Area/Pre-fire Strategies Deficiencies

During the final FHA review, all fire areas except one were found to have a fire hazards analysis and 58 of 62 fire areas were found to have administrative controls identified in the FHA included in their pre-fire strategies. A preliminary fire hazards analysis for the new fire area, not previously identified in the FHA, was performed to determine potential impact on safe shutdown capability. The preliminary analysis indicated that safe shutdown for this new fire area is provided utilizing Method 1 shutdown equipment and by initiating high pressure core spray (HPCS) in lieu of reactor core isolation cooling (RCIC) for level control during a fire. Also, administrative controls to align valve 1SFC*MOV120 to supply cooling to the upper fuel pools were necessary. MR 92-0013 was initiated on January 27, 1992, to make necessary document changes to the FHA and USAR for the new fire area. A new pre-fire strategy was prepared to identify this information to reactor operators and the fire brigade. Pre-fire strategies for the four fire areas were revised to include the omitted administrative controls identified in the FHA.

Multiple High Impedance Faults

Multiple high impedance faults involving associated circuits as identified in Generic Letter 86-10, section 5.3.8 have not been analyzed. A draft procedure has been prepared which provides information necessary to recover from a high impedance fault during a fire. This procedure will be implemented, with training completed, prior to startup from the fourth refueling outage which is scheduled to begin in March, 1992.

GSU will update this report by October 30, 1992. This report will provide a status and schedule for any corrective actions identified for the items described above. The completion dates indicated for the remaining corrective actions discussed in the supplement to GSU's response dated March 12, 1991, to the Notice of Violation for NRC Inspection Report No. 50-458/90-02 will remain as scheduled.