GULF STATES UTILITIES COMPANY

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

AREA CODE 504 635-6094 346-8651

February 11, 1992
RBG- 36487
File Nos. G9.5, G15.4.1

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

Gentlemen:

River Bend Station - Unit 1
Refer to: Region IV
Docket No. 50-458/91-28

Pursuant to 10CFR2.201, this letter provides Gulf States Utilities Company's (GSU) response to the Notice of Deviation for NRC Inspection Report No. 50-458/91-28. The inspection was conducted by Messrs. Barnes, Gilbert and McNeill during the period November 18-22, 1991, of activities authorized by NRC Operating License NPF-47 for River Bend Station - Unit 1. GSU's response to the deviation is provided in the attachment.

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

Sincerely,

J. C. Deddens
Senior Vice President
River Bend Nuclear Group

LAE/PDG/GAB/JHM/AS/df

Attachment

cc: U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

Senior Resident Inspector
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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

J. C. Deddens, 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.

J. C. Deddens

Subscribed and sworn to before me, a Notary Public in and for the State and Parish above named, this 11th day of February, 1992. My Commission expires with Life.

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

ATTACHMENT

RESPONSE TO NOTICE OF DEVIATION 50-458/9128-04

REFERENCES

Notice of Deviation - Letter from A. Bill Beach to J. C. Deddens, dated January 10, 1992.

DEVIATION FROM FIRE PROTECTION PROGRAM PROCUREMENT COMMITMENTS MADE IN USAR SECTIONS 17.2.4.2 AND .3

Section 17.2.4.3 of the River Bend Station Updated Safety Analysis Report (USAR) states, in part, ". . . the procurement documents are reviewed by qualified personnel, ensuring the adequacy of the quality and technical requirements. . . . The review is utilized to ensure that the quality requirements, including preparation, review, and approval, have been properly defined, that the procured items are inspectable and controllable, and that the acceptance criteria are adequately specified. . . ."

Contrary to the above, the following examples were noted where review of procurement documents did not ensure that shipping and storage temperatures for Thermo-Lag 330-1 subliming compound were correctly specified:

1. The procurement documents associated with Purchase Orders (POs) 91-D-71460 and 91-4-80590 did not reflect a vendor data sheet requirement that the material temperature must be maintained above 32 degrees F, thus resulting in verification of compliance with this requirement during shipment not being identified as a receipt inspection attribute.

2. The procurement documents associated with POs 89-B-7056, 89-L-73580, 91-D-71460, and 91-4-80590 did not reflect a vendor data sheet requirement that the material temperature must be maintained below 100 degrees F, thus resulting in verification of compliance with this requirement during shipment not being identified as a receipt inspection attribute.

3. The procurement documents associated with POs 89-B-7056, 89-L-73580, 91-D-71460, and 91-4-80590 identified storage conditions for the materials to be ANSI N4.5.2.2, Level B, which permits a maximum storage temperature of 140 degrees F.

REASON FOR THE DEVIATION

A. Cause -

The investigation into the cause of the deviation revealed the following:

1. Under River Bend Station's (RBS) commitments and QA program, catalog-type (off-the-shelf) items which fall under the definition of Quality Assurance Program Applicable (QAPA) do not require the same degree of quality assurance and controls as safety-related items. The QAPA category includes: fire protection (servicing safety-related areas); radwaste systems (pressure boundaries); transport packages for radioactive material and Cat II/I seismic. The controls usually applied to QAPA catalog-type items are fulfilled by QC inspection activities performed during receipt and in the field, or both QC receiving and QC field activities.

2. Since QAPA items are not safety-related, the engineers involved in establishing and reviewing the technical and quality requirements for these catalog-type items did not specify the verifications and storage requirements with the same degree of detail that they use on safety-related items. Because the items were not safety-related, there were other factors which contributed to the engineer's failure to establish extensive details within the purchase orders (POs) to address QC receiving activities and storage of the items. These contributing factors were as follow:

   a) The engineering procedures, for determining the technical and quality requirements for the procurement of items or services, focus on establishing the correct safety/quality class (QCLASS) of the items and assuring the proper procurement of safety-related items. The procedures do not require extensive written details to be given in the procurement documents for QAPA catalog-type items. Instead, they rely upon the site actions which are taken as a result of the QCLASS being identified and the storage level being established.

   b) The engineers involved were confident in the controls used for QAPA items used at RBS. They had established the correct QCLASS, that is QCLASS-2Q, which requires QC involvement and the correct storage designation. In addition, the engineers have always been aware of the following:

      - QC verifies the recorded temperature information which is provided with each shipment of the Thermo-lag 330-1 subliming compound.
      - The compound is stored in the paint lockers in level "B" storage, where the temperature is maintained and monitored as being above 32 degrees F but less than 100 degrees F.
      - After the compound is issued, there are installation requirements for Field QC to monitor/verify the proper setting of the compound. The compound will not set up properly if the batch has been mixed or handled incorrectly.

B. Impact -

Research was performed on the impact of the failure of the engineers to describe the QC receiving requirements and give specific handling and storage instructions within the respective PO. The research revealed the following:

1. The QC receiving documentation for Purchase Orders (POs) 91-D-71460, 91-4-80590, and 89-L-73580 reflects that QC checked the recorded temperature data for each of the POs. QC found that the shipments for POs 91-D-71460 and 91-4-80590 were acceptable. The strip recorder received with the shipment for PO 89-L-73580 had failed to operate correctly. Consequently, a sample from PO 89-L-73580 shipment was returned to the supplier for analysis and recertification. The supplier analyzed the sample, found it acceptable and recertified the batch.

2. The PO number 89-B-7056 identified in the NRC inspection report appears to have a typographical error since RBS purchase order numbers have 5 digits. The appropriate Region IV inspector has been contacted to resolve this discrepancy. Once the correct PO number is identified, it will be investigated and appropriate corrective actions taken.

3. A review of the warehouse temperature graphs from 12/14/87 to 1/27/92 revealed no occasion when the temperature exceeded 100 degrees F or was less than 40 degrees F.

C. Summary -

The investigation of the cause and the evaluation of its impact on the items, identified in the Deviation, are summarized as follows:

1. For QAPA catalog-type items, the RBS procedures do not require procurement documents to describe the item the QC receiving activities and storage controls as extensively as the NRC Deviation indicates they should.

2. The items received were acceptable for their intended applications. The controls used were based upon the QCLASS of the items, standard QC receiving practices and the designated storage levels (as applied at RBS) rather than upon requirements specifically stated in the PO. Therefore, there were no adverse effects upon the QAPA items received as a result of the conditions identified as unsatisfactory in the Deviation.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND RESULTS ACHIEVED

The engineers who were directly involved in the POs identified in the Deviation were given immediate verbal counseling on the NRC's concerns. In addition, the other engineers responsible for establishing the technical and quality requirements have received verbal directions during weekly group meetings to provide more detail and specific inspection criteria for verifications to be performed by QC personnel on QAPA procurements.

Revision 5 to EDP-EQ-01, "Technical, Quality and Documentation Requirements for Procurement Documents", has been drafted to provide more specific directions and acceptance criteria for QC receiving activities related to QAPA items.

The applicable portions of NRC Inspection Report No. 50-458/91-28 and the applicable extracts from EDP-EQ-01 were attached to a letter from the Supervisor - EQ & Specifications. The letter directs the engineer's attention to the "Notice of Deviation" and the draft procedure revision instructing each of them to implement appropriate corrective actions in accordance with the memorandum. The letter and attachments will be required reading for members of the EQ and Specifications group.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER DEVIATIONS

Revision 5 to EDP-EQ-01 when approved and issued will provide more specific directions for establishing the technical and quality requirements for QAPA catalog-type items. Training on the revised procedure will be provided to the members of the EQ and Specifications group.

DATE WHEN CORRECTIVE ACTION WILL BE COMPLETED

Revision 5 to EDP-EQ-01 will be approved by March 15, 1992. Training on the revised procedure will be completed by April 30, 1992.