

GULF STATES UTILITIES COMPANY

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AREA CODE 713 838-6631

September 4, 1984
RBG-18821
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:

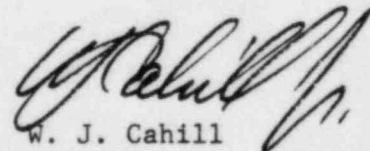
SEP 11 1984

River Bend Station Unit 1
Refer to: RIV
Docket No. 50-458/Report 84-15

This is in response to the Notice of Violation contained in NRC I&E Inspection Report No. 50.458/84-15. The inspection was conducted at the River Bend Station construction site by Mr. D. D. Chamberlain during the period June 1, 1984 through July 31, 1984, of activities authorized by NRC Construction Permit CPPR-145 for River Bend Station Unit No. 1.

Gulf States Utilities Company's (GSU) response to the Notice of Violation 84-15-02, "Failure to Follow Procedures," is provided in the enclosed attachment. This completes GSU's response to the Notice of Violation.

Sincerely,



W. J. Cahill
Sr. Vice President
River Bend Nuclear Group

WJC/~~WJC~~/PJD/lp

Attachment

8410190246 841015
PDR ADOCK 05000458
Q PDR

September 4, 1984
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ATTACHMENT

Response to Notice of Violation

Reference

Notice of Violation - E. H. Johnson letter to W. J. Cahill, dated August 16, 1984.

Refer to: Docket 50-458/84-15

Failure to Follow Procedures (84-15-02)

Response

Corrective Steps Which Have Been Taken and the Results Achieved

GSU Operations Quality Assurance conducted an unscheduled surveillance in parallel with the NRC inspection in the area of Construction Deficiency Report (CDR) processing, Project Test Program Directive (PTPD) 5.6, Rev. 3, "Punch Lists and Work Item Tracking During Equipment Release and Testing." The QA surveillance resulted in the issuance of Quality Assurance Finding Report "0-84-07-25-D directed at the Preliminary Test Organization. It was found that completed category I (safety-related) CDR's showed incomplete entries or lacked required signatures. This was consistent with the discrepancies addressed in the Notice of Violation.

The specific CDR discrepancies identified in both the Notice of Violation and Quality Assurance Finding Report have been reviewed against the processing requirements of PTPD 5.6, Rev. 3. Those CDR's which were identified as not having retest requirements and not having a description of the corrective action taken were reviewed to ensure these actions were documented on other documents (e.g., Rework Control Form, Inspection Report). An evaluation was conducted to determine the essentiality of the supervisor's signature. The results of the evaluation showed that for Category I CDR's, the supervisor's signature is non-essential. Those completed Category I CDR's which did not show a signoff by Field Quality Control (FQC), have been reviewed to ensure that the item tracked by the CDR is properly closed. In addition, CDR's in other Category I systems have been checked to ensure proper closeout via FQC signoff. As a result of these reviews, only two (2) of 275 Category I CDR's reviewed were inappropriately removed from the Punch List prior to FQC signoff of the CDR. These two items are being tracked by Inspection Report Number T4000089.

September 4, 1984
RBG-

Corrective Steps Taken to Avoid Further Violations

PTPD 5.6, Rev. 3, "Punch Lists and Work Item Tracking During Equipment Release and Testing," was reviewed by the Preliminary Test Organization, relative to Construction Deficiency Report processing. Change Notice I to PTPD 5.6, Rev. 3, was approved and issued by S&W on July 19, 1984. This Change Notice simplified the processing of Category I Construction Deficiency Reports by deleting non-essential signatures and entries (e.g., corrective action taken, retest requirements, supervisor's signature, site advisory manager's signature, PTO test engineer's signature). Training in the new requirements of CDR processing has been completed for Preliminary Test Organization and Field Quality Control personnel.

Date When Full Compliance Was Achieved

Full Compliance was achieved as of August 20, 1984.

*How is retest handled?
How are systems breaches identified.*

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

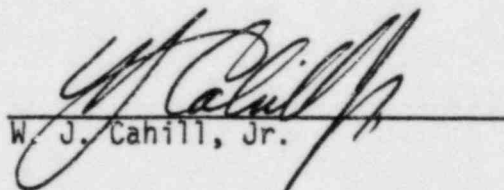
GULF STATES UTILITIES COMPANY

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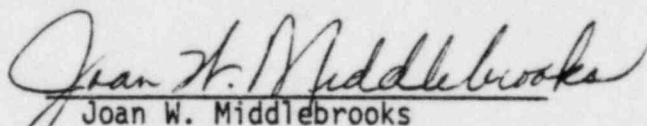
(River Bend Station,
Units 1 & 2)

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 4th day of September, 1984.


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

My Commission is for Life.