GULF STATES UTILITIES COMPANY

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

AREA CODE 504 635-6094 346-8651

January 11, 1985
RBG- 19881
File Nos. G.9.5, G.15.4.1

Mr. Robert D. Martin, Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV, Office of Inspection and Enforcement
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

RECEIVED
JAN 17 1985

Dear Mr. Martin:

River Bend Station - Unit 1
Refer to RIV
Docket No. 50-458/Report 84-32

This is in response to the Notice of Violation contained in NRC Inspection Report No. 50-458/84-32. The inspection was conducted at the River Bend Station construction site by Mr. W. R. Bennett during the period November 13-16, 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 84-32-01, "Failure to Follow Procedure," is provided in the enclosed attachment. This completes GSU's response to the Notice of Violation.

Sincerely,

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

PJD TFP TCC
WJC/PJD/TFP/TCC/dmm

Attachment

8503040455 850226
PDR ADOCK 05000458
Q PDR

ATTACHMENT

Response to Notice of Violation

References

Notice of Violation -E.H. Johnson letter to W. J. Cahill, December 12, 1984.

Refer to : Docket 50-458/84-32

Failure to Follow Procedure (84-32-01)

Response

Corrective Steps Which Have Been Taken and the Results Achieved

The six (6) procedures identified by the inspector were reviewed and the discrepancies concerning the use and accuracy of the LATERS pages are either corrected by Temporary Change Notices (TCN), or are being corrected by submittal of a procedure revision. Procedures GOP-0001, GOP-0002, GOP-0004, SOP-0031, and SOP-0032 were corrected by TCN Nos. 0-84-03, 0-84-04, 0-84-06, 0-84-02, and 0-84-01 respectively. Procedure ADM-0022 will be corrected by the submittal of a procedure revision.

Our review indicated that the procedures themselves correctly identified the LATER in the procedure body, and that the deficiency occurred because procedure preparers and reviewers did not assure the accuracy of the information included on the LATERS pages. All of the identified operating procedures (General Operating Procedures and Station Operating Procedures) have been approved; however, due to the status of the project, they had not been implemented. The LATER in the Station Administrative Procedure (ADM-0022) deals with a missing organization chart for the Operations Section.

On November 29, 1984, the station initiated a review of approved station procedures to determine the extent of this problem. Our review consisted of a 10% sample of those procedures written by each Plant Staff Section and our procedure preparation Contractor. The results of this sample review were generally satisfactory. However, the LATERS page deficiency rate in the following areas was unacceptable:

Fire Protection Procedures (FPP)

Operations Procedures (all types - GSU prepared)

Surveillance Test Procedures (STP) (contractor prepared)

ATTACHMENT

Response to Notice of Violation (continued)

Corrective Steps Which Have Been Taken and the Results Achieved (continued)

Based on the sample results, a review of 100% of approved procedures in the above areas is being conducted. Any LATERS page deficiencies will be corrected.

This Notice of Violation and the need to follow procedures were emphasized during Plant Manager staff meetings and procedure meetings, between the Plant Manager and the station supervisors.

Corrective Steps Which will be Taken to Avoid Further Violations

Review of the procedures in the three areas indicated on the preceding page will be completed and LATERS page deficiencies corrected. Those individuals responsible for the independent and technical review, and approval of procedures have been reminded by memorandum (APMS - 978-84) of their responsiblity to assure both the technical adequacy of procedures and compliance with Station Administrative Procedures. The need to comply with all written procedures will continue to be stressed by station management.

Date When Full Compliance Will be Achieved

Those procedures identified in the Inspection Report will be revised to be in compliance with ADM-0003 concerning the use of LATERS pages by January 31, 1985.

Additional reviews will be completed by January 31, 1985, and any resulting procedure revisions completed by March 3 , 1985.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

STATE OF LOUISIANA	§	
PARISH OF WEST FELICIANA	§	
In the Matter of	§	Docket Nos. 50-458
		50-459
GULF STATES UTILITIES COMPANY	§	

(River Bend Station,
Unit 1)

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 11th day of January, 1985.

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

My Commission is for Life.