



GULF STATES UTILITIES COMPANY

RIVER BEND STATION

POST OFFICE BOX 220

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AREA CODE 504

635-6094

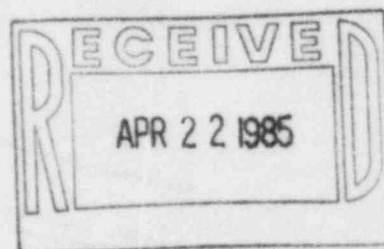
346-8651

April 18, 1985

RBG- 20753

File Nos. G9.5, G15.4.1

Mr. Robert D. Martin, Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011



Dear Mr. Martin:

River Bend Station - Unit 1
Refer to: Region IV
Docket No. 50-458/Report 85-02

This letter is in response to the Notice of Violations contained in NRC I&E Inspection Report No. 50-458/85-02. The inspection was performed by Messrs. W. M. McNeill, D. L. Garrison, and C. E. Johnson during the period January 21-25, 1985, 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 Violations 85-02-01, "Warehouse Controls," 85-02-02, "Records Storage," and 85-02-03, "Construction Records," is provided in the enclosed attachment. This completes GSU's response to the Notice of Violations.

Sincerely,

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

WJC
PJD TCC
WJC/PJD/TCC/trp

Attachment

8505100290 850426
PDR ADOCK 0500045B
G PDR

IC-031/85

ATTACHMENT

April 17, 1985
RBG- 20753

Response to Notice of Violations

Reference

Notice of Violations - E. H. Johnson letter to W. J. Cahill, dated March 18, 1985.

Refer to Docket No. 50-458/85-02.

Response To Violation 85-02-01 Warehouse Controls

Corrective Steps Which Have Been Taken and Results Achieved

ANSI and ASME codes were reviewed for Spare Parts storage requirements and MSP-0002 was revised to clarify the methods used to meet these requirements. The GSU Management organization which had recently been restructured to bring the maintenance, purchasing and warehouse activities under the direction of the Assistant Plant Manager of Maintenance & Materials, has clearly established the responsibilities for the warehouse maintenance program and has begun its implementation. Quality Control has established and implemented a Monitoring Program which includes warehouse and preventive maintenance activities.

The following information addresses the specific examples cited in the inspection report:

- a. MHP-0002, Section 4.3.1, has been revised to reflect the present method for labeling parts. MHP-0002, Rev. 2, requires the labeling to indicate, at a minimum: (A) Purchase Order number; (B) Purchase Order item; (C) Safety Classification; and, as applicable, (D) ASME Code Classification.
- b. The material cited has been removed and relocated. MSP-0002, Section 4.4.5, has been revised to clarify the methods used to meet the ANSI and ASME code storage requirements.
- c. Areas on the chemical storage pad have been assigned to separate safety chemicals from non-safety chemicals. Safety and Health Representatives inspected the chemical pad and confirmed that the stored materials are compatible. This inspection has been documented. MHP-0002, Section 4.4.3, has been revised to

clarify requirements for storage of flammable or other hazardous chemicals.

- d. Equipment Storage History Cards (ESHC's) and their associated Maintenance Check Records are being initiated and are now maintained in accordance with MHP-0004.
- e. New ESHC's with appropriate maintenance requirements have been established. The transformers identified as not having preventive maintenance accomplished have been inspected, and no deterioration was identified. Maintenance is being performed in accordance with MHP-0004.
- f. Maintenance personnel are presently preparing ESHC's for those items received since November 1984, which do not have ESHC's. The safety-related equipment not having preventive maintenance performed during this period is being identified to Engineering for evaluation and disposition. Those items identified by the inspector have been evaluated and required corrective action has been taken.
- g. An annual Q.C. Monitoring Plan has been established which covers all types of maintenance activities. The Q.C. Supervisor is now on distribution for a copy of monthly maintenance schedules which enables adjustments to the annual schedule and assignment of monitoring inspections. QCI 3.10, which had not been written, was incorporated into QCI-3.8. Training of requirements has been provided to all inspectors who perform monitoring inspections in accordance with QCI-3.8.

Corrective Steps Which Will Be Taken To Avoid Further Violations

As required by procedures, a Warehouse Maintenance Coordinator has been appointed to coordinate and support warehouse maintenance activities. Warehouse personnel were counseled to ensure compliance to the procedure, and training was given to Q.C. Inspectors on the Q.C. Monitoring Program.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved by July 1, 1985.

Response to Violation 85-02-02 Records Storage

Corrective Steps Which Have Been Taken and Results Achieved

The problems identified with storage of certain records in Stone and Webster's QC vault and GSU's Permanent Plant vault have been corrected by removing all loosely stored paper, placing paper in binders or folders and filing the binders/folders in metal file cabinets. Paper-board boxes have been removed from the vaults and documentation is no longer left on tables at the end of the day.

A surveillance inspection of the vaults was conducted on March 18, 1985. It was verified that corrections have been made and that the vaults at the River Bend Station are now in full compliance with requirements.

Corrective Steps Which Will Be Taken To Avoid Further Violations

Personnel employed and working in vaults have been given additional training regarding the regulations governing records storage, ANSI N45.2.9-1974. This activity has been and will continue to be monitored by the Quality Systems Group.

Date When Full Complainece Was Achieved

Full compliance was achieved by March 18, 1985.

Response to Violation 85-02-03 Construction Records

Corrective Steps Which Have Been Taken and Results Achieved

Unsatisfactory Type "C" Inspection Report #S56200002 was initiated by FQC identifying the apparent construction procedural violation of CMP-1.11 and CSI-1.0.36 regarding the lack of documentation for safety-related structural steel columns.

The ES-1 series drawings and column schedules were reviewed and it was determined the Auxiliary Building contained a total of 64 of this type column connection and the Control Building contained a total of 18. No other safety related buildings are affected.

Construction reviewed Auxiliary Building checklists and could not locate the records; therefore, to assure compliance to project specifications, new checklists were issued and reinspection performed as documented on CCP's 5-06-11AB3759, 2761, 3762, 3763, 3764, 3767, 3768, 3769, and 3804. Inspection Reports S5200193 and S5200497 were issued by FQC to document the reinspection/acceptance of the columns referenced in the checklists. The 64 columns identified in the Auxiliary Building include the original P1 through P8 identified in the violation.

Column connections in the Control Building are not accessible for reinspection because of grouting; however, prior to grouting, concrete pour cards documented completion and inspection by construction. Pursuant to CSI 1.0.36, paragraph 5.1.1, Construction is not required to prepare separate CCCP checklists when concrete pour cards are used to document acceptance. Inspection Reports S1200508 and S0200122 document FQC inspection and acceptance of 17 of the 18 columns in the Control Building.

The incorrect technical data entered on Inspection Report (IR) No. S1201943, has been corrected to reflect the correct type of bolt. The torque requirement (snug tight) is correct for either type bolt since the bolt size and type are not relevant to torque. No further action if required.

A 100% review and acceptance of original records for the Control Building and a 100% reinspection and acceptance in the Auxiliary Building was performed for this type of column.

Corrective Steps Which Will Be Taken To Avoid Further Violations

Training for all ironworker supervisory personnel was held on CMP-1.11, "Construction Control and Completion Program," delineating the responsibilities of this procedure as documented by the training record dated March 7, 1985. Recurrence of this concern is not likely since all structural columns have been erected.

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The inspector of record on IR #S1201943 is no longer employed by Stone & Webster Engineering Corporation, FQC Division.

Date When Full Compliance Was Achieved

Full compliance was achieved by April 10, 1985.

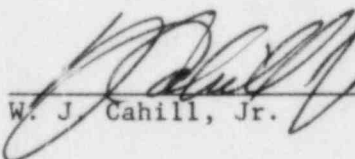
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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

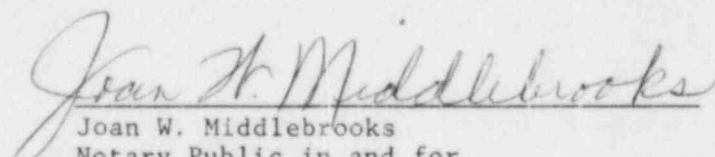
(River Bend Station,
Unit 1)

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 17 day of April, 1985.


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

My Commission is for Life.