GULF STATES UTILITIES COMPANY

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

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February 19, 1985
RBG- 20183
File Nos. G9.5, G15.4.1

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

RECEIVED
FEB 26 1985

Dear Mr. Martin:

River Bend Station Unit 1
Refer to: Region IV
Docket No. 50-458/Report 84-28

This is in response to the Notice of Violations contained in NRC I&E Inspection Report No. 50-458/84-28. The inspection was performed by Mr. R. E. Farrell during the period September 26 through December 21, 1984, of activities authorized by NRC Construction Permit CPPR-145 for River Bend Station Unit 1.

Gulf States Utilities Company's (GSU) response to the Notice of Violations 84-28-01, 84-28-02, and 84-28-03 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/trp

Attachment

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PDR ADOCK 05000458
Q PDR

ATTACHMENT

February 19, 1985
RBG-20183

Response to Notice of Violations

Notice of Violations - E. H. Johnson letter to W. J. Cahill, dated January 16, 1985.

Refer to Docket No. 50-458/84-28.

1. Quality Assurance Audit Program (84-28-01)

Response

Corrective Steps Which Have Been Taken and the Results Achieved

GSU QA Systems audited GSU Maintenace (identified as GSUS/PPPM-85/01) from January 3, 1985 through January 14, 1985 to specifically address preventative maintenance of equipment, on-site, which is under GSU control. The audit report was issued on January 18, 1985.

An audit of the Riverside Central Services (identified as GSU LASA-84/11) located in Natchez, Mississippi was in progress at the time of the NRC inspection and this audit was expanded to specifically address preventive maintenance for equipment stored at that location. This audit was completed on January 3, 1985. Several Quality Assurance Finding Reports (QAFRs) were written identifying those areas which are not in compliance with applicable methods, controls, and procedures.

MOV equipment under GSU SU&T jurisdiction is maintained in accordance with Test Instruction 12 and Preventative Maintenance Procedure (PMP) 1205. PMP-1205 was revised effective December 10, 1984 to verify that motor space heaters are operational, if so equipped. Test engineers and operations personnel have been reminded via memo APM-0-84-5 that equipment breakers shall be in their normal operating alignment unless tagging out to support maintenance or testing. Heaters are not required when the equipment is being operated or regularly exposed, or after building HVAC has been operational (e.g., a warehouse environment no longer exists). Heaters will be disconnected prior to fuel load in accordance with equipment qualifications requirements.

Corrective Steps Which Will Be Taken To Avoid Further Violations

The audits described above place us in full compliance and a review

of the audit schedule and specific audit activities for 1985 have been completed. The inputs for the specific activites were obtained by a review of ANSI N18.7 "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants", the River Bend PSAR, FSAR, NQAM and OQAM, information obtained from other nuclear plants similar to RBS, and the collective experience of the QA personnel currently assigned and other key management personnel.

Date When Full Compliance Was Achieved

Full compliance was achieved by February 15, 1985.

2. Quality Assurance Records (84-28-02)

Response

Corrective Steps Which Have Been Taken and the Results Achieved

The past practice of the GSU River Bend QA Department has been to use the audit checklists as working documents and as such were retained in files.

Quality Assurance Instruction (QAI) - 2.1, "Audit Performance and Reporting", has been revised to state in part the following:

...The completed checklists will be retained as part of the official audit folder, which includes the originals of the Quality Assurance Finding Reports (QAFRs), audit plan, audit report, written replies and the record of the completion of corrective action, until the audit is closed (i. e. all QAFRs have been closed). These official audit folders, including the checklists, will then be forwarded to GSU Records Management for retention...". This documentation includes the schedule which is sent to Records Management after the end of each year.

Corrective Steps Which Will Be Taken to Avoid Further Violations

The immediate procedure revision described above places us in full compliance and will prevent this violation from recurring in the future.

Date When Full Compliance Was Achieved

Full compliance was achieved by February 15, 1985.

3. Control of Quality Assurance Procedures (84-28-03)

Response

Corrective Steps Which Have Been Taken and the Results Achieved

The requirements for the conduct and the reporting of audits were essentially the same in both the NQAPD-103 and QAI-2.1 and both meet the FSAR commitments.

NQAPD-103, Revision 5, "Audit Performing And Reporting", was cancelled, effective January 19, 1985, in accordance with the provisions of NQAPD-100, Revision 3, "Preparation, Review, Approval and Distribution of the Nuclear Quality Assurance Manual (NQAM)" and was superceded by QAI-2.1, Revision 1, "Audit Performance and Reporting".

A review of other applicable NQAPD's has been completed. During the review it was discovered that NQAPD-100 had been inadvertently cancelled and as a result of this discovery particular NQAPD's have been identified as still in effect and will remain in effect until their applicability has been thoroughly reviewed prior to supercession.

Corrective Steps Which Will Be Taken To Avoid Further Deviations

The immediate procedure cancellation and supercession described above places us in full compliance.

Date When Full Compliance Was Achieved

Full compliance was achieved by January 25, 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 19th day of February, 1985.

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

My Commission is for Life.