

GULF STATES UTILITIES COMPANY



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May 15, 1985
RBG- 21,017
File Code: G9.5, G9.19.2,
G9.33.4

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Denton:

River Bend Station - Unit 1
Docket No. 50-458

In discussions with the NRC staff, additional information was requested to clarify Gulf States Utilities Company's (GSU) April 17, 1985 submittal concerning River Bend Station Emergency Operating Procedure (EOP) deviations from the BWR Owners Group Emergency Procedure Guidelines (EPG). The attached information addresses the staff's comments.

This completes GSU's response to Confirmatory Item No. (60).

Sincerely,

J. E. Booker

J. E. Booker
Manager-Engineering,
Nuclear Fuels & Licensing
River Bend Nuclear Group

[Signature]
JEB/DRG/MOB/RJK/amg

Attachment

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Attachment

Response to NRC Request for Additional
Information on RBS EOP/EPG Deviations

QUESTION #1 - Deviations Page No. 7 and 16.

- a. From the staff's review of step C3.3.6, EOP-0001, Rev. 1, the step appears to incorporate portions of contingencies 2 and 7 of the EPG's (Rev. 3). Placing both of these contingencies within the same step makes the technical compatibility of the contingencies questionable because the sections referenced of each contingency have different purposes. The procedural addition, as identified in the applicant's justification to this deviation, does not satisfy the intent of EPG step C2-1.3. Provide justification for the approach being taken by the revised EOP step C3.3.6.3 or describe how the guidance for EPG step C2-1.3 will be incorporated into the revised EOP step.

RESPONSE - Step C3.3.6 of EOP-0001 does not solely incorporate portions of contingencies 2 and 7. Rather, step C3.3.6 of EOP-0001 is directed to be performed concurrently with AOP-0021, steps 5.7.3 and 5.8 (Rev. 2). There exists no technical incompatibility between the two procedures as written (see enclosure).

- b. The addition to step C3.3.6.3 is improperly constructed. "IF...BUT", is not an acceptable logic statement and does not conform to the guidance provided in the applicant's Author's Guide. Two acceptable rewordings for this construction are, "IF more than 2 SRV's are open and less than 7 are open, THEN continue in this procedure at Step 3.3.6.4" and, "IF between 2 and 7 SRV's (inclusively) are open, THEN continue in this procedure at Step 3.3.6.4". Provide a correctly worded step C3.3.6.3.

RESPONSE - We concur with the comment and will revise the step (see enclosure). This will be performed prior to exceeding 5% power.

- c. The response to this item refers to Rev. 2 of EOP-0001. If the change to this deviation (page no. 7) has resulted in additional safety-significant deviations, provide these deviations with their justifications or a statement that no safety-significant deviations were created by Rev. 2.

RESPONSE - The change to the procedure as stated in the deviation has made the step consistent with the EPG's; therefore, no additional safety-significant deviations were created by changing this step in Rev. 2.

QUESTION #2 - Deviation Page No. 10.

Indicate whether or not the GE review of the EOP's and SOP-0020, 0021, and 0022, resulted in any questions/changes to the procedures. If there were questions and/or changes from the review, indicate if they have resulted in additional safety-significant deviations. Provide the additional deviations with their justifications if any have occurred.

RESPONSE - GE has completed three separate reviews of the EOP's/AOP's which resulted in changes to the procedures. GE's comments have been adequately resolved. Changes have been reviewed for technical deviations. Therefore, no additional technical deviations were identified after GSU's January 15, 1985 deviation package submittal to the NRC.

QUESTION #3 - Deviation Page No. 39.

Provide an explanation for this deviation. It was an item included in the March 18, 1985 RAI.

RESPONSE - In GSU's March 19, 1985 letter, the explanation to Deviation Page No. 39 was inadvertently omitted. The following should have been submitted which fully resolves the deviation by meeting the intent of the EPG's:

The intent of statement "if no HPCS or LPCS is operating," has been reinserted into step 3.2.10 of EOP-0004.

QUESTION #4 - Deviation Page No. 52.

Response is satisfactory, provided that step C3.1.4 is the same step as C3.1.3 in EOP-0005, Rev. 1. If step C3.1.4 is different than C3.1.3 (Rev. 1), explain why the step was renumbered.

RESPONSE - Step C3.1.4 is the same step as C3.1.3 in EOP-0005, Rev. 1, therefore, this deviation should be satisfactory.

INSTRUCTIONS

- ___ 2. IF available, open all turbine bypass valves.

SEE CAUTION #16

- ___ 3. IF suppression pool indicated water level above -14 ft.

THEN

a. Open all ADS valves.

OR

b. Open SRV's until a total of 7 are open.

- ___ 4. Monitor RPV water level

- ___ 5. Maintain containment parameters as follows:
___ Containment to annulus differential pressure below 15 Psid
___ Drywell to containment differential pressure below 25 Psid
___ Drywell temperature below 330°F

CONTINGENCY ACTIONS

3. IF ^{more} ~~less~~ than ² ~~7~~ SRV's are open AND ~~BUT~~ ^{less} more than ~~7~~ are open, THEN continue in this procedure at Step 3.3.6.4. IF less than 3 SRV's are open OR IF suppression pool indicated water level is not above -14 ft. THEN rapidly depressurize the RPV using: [NOTE 10]
___ RCIC (Enclosure 4)
___ RHR Steam Condensing (Enclosure 5)
___ Main Condenser (Enclosure 6)
___ SJAE (Enclosure 7)
___ Steam Seal Evaporator (Enclosure 8)
___ Main Steam Drains (Enclosure 9)
___ RPV Head Vent (Enclosure 10)

4. IF RPV water level cannot be determined THEN exit this procedure and complete EOP-0005 "RPV Flooding".

5. IF containment parameters cannot be so maintained THEN exit this procedure and complete EOP-0005 "RPV Flooding".