



# GULF STATES UTILITIES COMPANY

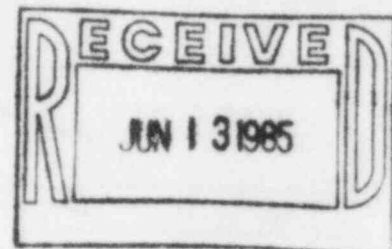
RIVER BEND STATION POST OFFICE BOX 220 ST. FRANCISVILLE, LOUISIANA 70775  
AREA CODE 504 635-6094 346-8651

June 7, 1985  
RBG-21245  
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:

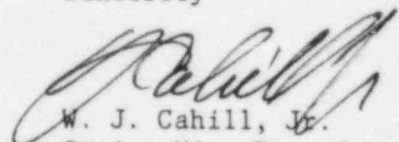
River Bend Station - Unit 1  
Refer to: Region IV  
Docket No. 50-458/Report 85-20



This is in response to the Notice of Violations contained in NRC I&E Inspection Report No. 50-458/85-20. The inspection was performed by Messrs. W. R. Bennett, C. C. Harbuck, and Ms. K. A. Whittlesey during the period March 18-22, 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 85-20-04, "Implementation of a 'Z' Series E&DCR," 85-20-01, "Operating Procedures," and 85-20-05, "Performance of Time Delay Control Relay Set Point Verification Testing," is provided in the enclosed attachment. This completes GSU's response to the Notice of Violations.

Sincerely

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

*PJD 957 mdu*  
WJC/PJD/PEF/TFP/TCC/amg  
*WJC*

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IC-069/85

ATTACHMENT

June 7, 1985  
RBG- 21245

Response to Notice of Violations

Reference

Notice of Violations - E. H. Johnson letter to W. J. Cahill, dated May 8, 1985.

Refer to Docket 50-458/85-20.

Response to 85-20-04 Implementation of a "Z" Series E&DCR

Corrective Steps Which Have Been Taken and Results Achieved

All "Z" series E&DCRs which had been implemented were identified and associated documents revised to their previous condition.

Corrective Steps Which Will Be Taken To Avoid Further Violations

The lower level procedure was revised to control implementation of "Z" series E&DCRs and appropriate personnel were made aware of the revision. As a result, "Z" series E&DCRs are not being implemented.

Date When Full Compliance Was Achieved

Full compliance was achieved by May 23, 1985.

Response to 85-20-01 Operating Procedures

Corrective Steps Which Have Been Taken and Results Achieved

With regard to the examples involving procedure errors, corrective action has been initiated for all 11 examples. The cited procedural deficiencies are being corrected by procedure revision or the processing of temporary changes to the procedures. Explicit corrective action for the 11 examples is provided below:

- a. This discrepancy was corrected during the Field Verification Performance of the procedure. Revision One of STP-051-4224 will include Step 7.3.2.8, requiring removal of the temporary jumper.
- b. GOP-0003 "Shutdown From Low Power Alarm Point to Hot Standby" - is in the Revision 1 Review Cycle with these changes incorporated.
- c. TCN-85-309 - Has been issued to SOP-0018 Normal Service Water to correct the "Light" color error.
- d. TCN-85-310 - Has been issued to SOP-0029 Automatic Depressurization System to incorporate dual sign off column.
- e. GOP-0003 "Shutdown From Low Power Alarm Point to Hot Standby" is in the Revision 1 Review Cycle with these changes incorporated.
- f. A Procedure Comment Control Form has been issued to revise Step 7.2.23 to Reference 7.2.24. This change will be incorporated into Revision One of STP-051-4224.
- g. This error was identified and corrected during the Field Verification Performance of the procedure. Revision One of STP-051-4250 will call for equipment for Step 6.7.
- h. The cause of this procedural inadequacy was evidently comment incorporation that changed procedure steps without changing the corresponding item number on Attachment 2. This inconsistency is being corrected in Rev. 1 to the identified STP. Please note that STP-057-7704 has changed to STP-057-3704. This procedure is currently in the Revision 1 approval cycle.
- i. This procedural inadequacy resulted from the procedure specifying a Data Sheet 1 when, in fact, the data was on an Attachment. This Surveillance Test Procedure is currently in the Revision 1 approval cycle which will eliminate this procedural inconsistency.
- j. This discrepancy was identified and corrected during the Field Verification Performance of this procedure. The Acceptance Criteria in Revision One of STP-203-1302 will indicate the

correct limit, as required by the River Bend Technical Specification, for the Battery Average Specific Gravity.

- k. This comment has been incorporated into the Revision One mark-up of the procedure. Revision One of STP-203-1302 will specify that the battery charger is in a float condition.

Corrective Steps Which Will Be Taken To Avoid Further Violations

Extensive efforts are on-going to "walkdown" procedures and identify and resolve deficiencies in preparation for fuel load. Also, procedure reviewers have been verbally cautioned concerning attention to detail and the need to eliminate procedural inconsistencies.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved by June 19, 1985.

Response to 85-20-05 Performance of Time Delay Control Relay Set Point Verification Testing

Corrective Steps Which Have Been Taken and Results Achieved

With regard to the reviewed and approved test data sheets for relays associated with the Loss of Coolant Accident/Loss of Offsite Power sequenced loads, the following information is provided for the problems identified:

1. 1HVP\*FN2A

The correct set point time tolerance, in accordance with STT 1HVP.000.049, was placed on the test record.

The proper value (2%) was listed in accordance with STT 1HVP.000.049.

The proper voltage (DC) was listed in accordance with STT 1HVP.000.049.

The Instruction Manual number blank, in accordance with STT 1HVP.000.049, was determined to be not applicable because there is no existing manual for the relay. An approved setpoint data sheet was used.

2. 1HVP\*FN2B

A retest was satisfactorily performed on STT HVP.000.049. All times were within two percent of the setpoint value.

3. 1HVR\*UC1A and 1HVR\*UC1B

The Resistance should have been written as greater than 20 mohms. Correction was made on April 2, 1985.

4. 1GTS\*FN1A

STT-GTS-000-030 was written and retest was performed satisfactorily on March 25, 1985.

The Setpoint Data Sheet called for approximately a 1% tolerance which was the value used. The SPDS is the controlling document which provided for a more stringent requirement than the procedure.

5. 1HVR\*FN11A

The test record was changed to reflect approximately .48 sec. (approximately 2%) on April 13, 1985. Test results were within this requirement.

6. 1HVC\*ACU1A, 1HVC\*ACU2A, 1HVC\*ACU1B, 1HVC\*ACU2B

STT-HVC-000-035 was written and retest was performed satisfactorily on March 27, 1985 in accordance with 1-G-EE-17.61.

Corrective Steps Which Will Be Taken To Avoid Further Violations

The JTG review staff has been instructed by the JTG Chairman to provide a more stringent critique of completed generics and PT/AT test results to preclude recurrence of this problem.

The Plant Manager has issued a memorandum to test personnel, Plant Staff Personnel and Test Technicians that emphasizes the use of correct procedures, qualified personnel and documentation quality.

Date When Full Compliance Was Achieved

Full Compliance was achieved by June 5, 1985.

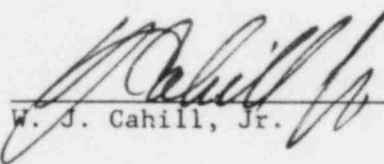
UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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

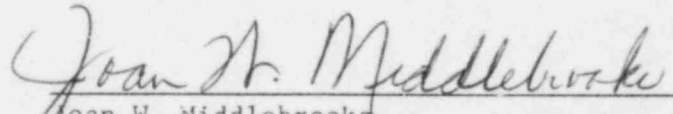
(River Bend Station,  
Unit 1)

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 14th day of June, 1985.

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

My Commission is for Life.