



GULF STATES UTILITIES COMPANY

POST OFFICE BOX 2951 • BEAUMONT, TEXAS 77704

AREA CODE 409 838-6631

July 22, 1985
RBG- 21,585
File Nos. G9.5, 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
Generic Letter 85-07

Attached please find forty (40) copies of Gulf States Utilities (GSU) response to Generic Letter 85-07 entitled "Implementation of Integrated Schedules for Plant Modifications".

Sincerely,

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

JEB/~~MWH~~/lp

Attachment

8507300342 850722
PDR ADOCK 05000458
A PDR

Boo!
11

ENCLOSURE 2

RESPONSE FORMAT - GENERIC LETTER 85-07

PLANT NAME: River Bend Station

UTILITY: Gulf States Utilities Company

I. INTENTIONS

- A. Intend to work with the staff to develop an ILS _____
- B. Have reservations that must be resolved before developing ILS X
- C. Do not presently intend to negotiate an ILS with the staff _____
- D. Plan to implement an informal ILS only _____

II. STATUS

A. If you answered I.A above:

1. Have you settled on a method for prioritizing the work at your plant(s)?

Circle One: Yes No

If yes, select best description:

Engineering judgement _____
Analytic Hierarchy process _____
Risk based analysis _____
Cost-benefit analysis _____
Other (please describe) _____

If no, provide estimated date for selecting a methodology:

_____ Date

or

If not presently available, provide estimated date for scheduling the selection of a methodology: _____

2. What is your estimated date for making a submittal to the NRC- _____

or

If not presently available, planned date for scheduling a submittal to the NRC _____

B. If you answered I.B above:

1. Please explain your reservations on separate sheet(s) or provide your schedule for supplying an explanation

See separate sheet(s)

or

See Attachment

Separate submittal scheduled for

(Date)

2. If available to meet with the staff to discuss your concerns, propose a time frame for such a meeting and provide a contact that can make arrangements

Contact/Time Frame J. E. Booker/September, 1985

Phone Number (409) 839-2281

C. If you answered I.C

1. Would you be willing to meet with the staff to discuss the development of an ILS for your facility(s)?

Circle One: Yes No

If yes, propose a time frame for such a meeting and provide a contact that can make arrangements.

Contact _____

Time Frame _____

Phone Number _____

If no, any constructive comments you have would be appreciated.

III. ADDITIONAL ITEMS

Please make any suggestions you may have as to how a utility sponsored availability/reliability project might be credited for plant safety enhancement. Provide additional constructive comments as appropriate.

Attachment

July 22, 1985
RBG- 21,585

Gulf States Utilities (GSU) is currently in the process of establishing an Integrated Living Schedule Program (ILSP) for River Bend Station (RBS). Priorities for the ILSP will initially be based upon engineering judgement for required modifications. GSU plans to study the use of PRA methodology for priority determination. This program is intended to address plant modifications and to establish the mechanism for integration of required plant safety, financial and resource planning. However, since the program is in its developmental phase, GSU feels an unlicensed approach is warranted at this time. After program implementation and a sufficient period of experience is obtained, GSU may consider discussing such a program with the NRC.