

APPENDIX A

NOTICE OF VIOLATION

Gulf States Utilities  
River Bend Station, Unit 1

Docket: 50-458  
Permit: CPPR-145

During an NRC inspection conducted on June 17-21, 1985, a violation of NRC requirements was identified. The violation involved the review of preoperational test results. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the violation is listed below:

Failure to Adequately Review Preoperational Test Results

10 CFR Part 50, Appendix B, Criterion XI, requires that preoperational test results be documented and evaluated to assure that test requirements have been satisfied. This requirement is part of the licensee's approved quality assurance program and is listed as a specific responsibility of the licensee's Joint Test Group (JTG) in Test Instruction-5, Revision 4, approved April 12, 1985, of the licensee's Startup Manual (SUM). This instruction states, in paragraph 3.3.1.6, that the JTG is responsible to "review and approve all preoperational test results."

Contrary to the above, the JTG failed to perform an adequate review of licensee preoperational test 1-PT-052, "Control Rod Drive Hydraulic," as evidenced by the following examples identified by the NRC inspector:

- a. Nonconformances to SUM Test Instruction - 8, "Conduct of Testing":
  - Failure to document when the actions for the disposition of test exceptions (TEs) were completed for TE-02, 07, 17, and 26, as required by ¶ 2.2.4 of TI-8.
  - Contrary to ¶ 3.3.9 of TI-8, the initials and date for procedure step 10.4 were lined out when a test exception was subsequently written against that step.
  - Data entry corrections on pages 7 and 8 of the attachment to TE-20 were not dated as required by ¶ 3.1.2 of TI-8.
- b. Nonconformance to SUM Test Instruction-3, "Changes to Test Procedures":
  - The note, "MCR-06," was not written in the right hand margin of the page in the procedure where the major change to the procedure was made, step 10.9. This is contrary to TI-3, ¶ 3.3.1.5.

c. Other problems noted:

- The licensee did not justify, in the procedure, the use of a constant minimum recirculation flow rate for the Control Rod Drive Hydraulic system, which introduced error in the test data for pump flow rates.
- A person, other than the two test engineers signing the proposed disposition and actual disposition sections on TE-14, made changes to the written disposition statements on the TE form without initialing and dating the changes.
- The initial statement of the problem on TE-24 was in error.
- Steps 7.11.14, 7.11.14.1, and 7.11.14.2 of the procedure were not initialed and dated.
- Procedure acceptance criteria step 10.8.1 was not initialed and dated complete, although TE-23, which had been written against it, had been completed prior to the final JTG review and approved of the test results on June 6, 1985.

This is a Severity Level IV violation (Supplement I.D)(8549-01).

Pursuant to the provisions of 10 CFR 2.201, Gulf States Utilities is hereby required to submit to this office within 30 days of the date of the letter transmitting this Notice, a written statement or explanation in reply, including for each violation: (1) the reason for the violations if admitted, (2) the corrective steps which have been taken and the results achieved, (3) the corrective steps which will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,  
this 1st day of Aug., 1985.