GULF STATES UTILITIES COMPANY

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

AREA CODE 504 635-6094 346-8651

August 30, 1985
RBG- 21985
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

RECEIVED
SEP - 3 1985

Dear Mr. Martin:

River Bend Station - Unit 1
Refer to: Region IV
Docket No. 50-458/Report 85-19

This is in response to the Notice of Violations contained in NRC I&E Inspection Report No. 50-458/85-19. The inspection was performed by Messrs. I. Barnes and R. G. Taylor during the period March 11 - May 17, 1985, of activities authorized by NRC Construction Permit CPPR-145 for River Bend Station Unit No. 1.

Gulf States Utilities Company's (GSU's) response to the Notice of Violations 85-19-01, "Incorporation of E&DCR Information Into Drawings," and 85-19-02, "Use of External Historical Data in Evaluation of Suppliers," 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

TCC BEH
WJC/TCC/BEH/je

Attachment

8510220359 851015
PDR ADOCK 05000458
G PDR

IC-130/85

ATTACHMENT

August 30, 1985
RBG- 21985

Response to Notice of Violations

Reference

Notice of Violation - E. H. Johnson letter to W. J. Cahill dated August 1, 1985.

Refer to Docket No. 50-458/85-19

Response to 85-19-01 "Incorporation of E&DCR Information Into Drawings"

Reason for the Violation

The condition cited was caused by a series of events related to the checking process utilized for the drawings involved. During the preparation of the drawing revisions to incorporate the affected Engineering and Design Coordination Reports (E&DCRs), three individuals from the Electrical Design Group were assigned to check the drawings. All of these individuals left the employ of Stone & Webster Engineering Corporation (SWEC) prior to completion of the checking process and prior to placing their initials on the drawings as being responsible for checking. Three additional individuals were then assigned to complete the checking process. These individuals did not adequately review the work performed by the previous checkers.

Corrective Steps Which Have Been Taken and Results Achieved

A 100% review of all E&DCRs incorporated into the EE-340 series drawings during the effort described above is complete. All incorporation errors noted have been corrected via issuance of E&DCRs.

The individuals who took responsibility for the drawings' checking performed by those who left the employ of SWEC have been counselled to ensure that they thoroughly review work performed by others prior to placing their initials on the document.

Corrective Steps Which Will Be Taken to Avoid Further Violations

The incorporation requirements for SWEC drawings prescribed in River Bend Procedure (RBP) 12.0 do not mandate drawing revisions to incorporate E&DCRs until system turnover to GSU or fuel load. The effort to incorporate these E&DCRs prior to drawing transfer from SWEC (Cherry Hill) to SWEC (Site Engineering Group) responsibility was unique. No other drawing revisions were being processed at that time. Therefore, it is GSU's position that the observed conditions were isolated and no further corrective steps are necessary.

Date When Full Compliance Was Achieved

Full compliance was achieved on June 28, 1985.

Response to 85-19-02 "Use of External Historical Data in Evaluation of Suppliers"

Reason for the Violation

The condition cited was caused by the failure to indicate a supplier as conditionally approved on the Qualified Suppliers List (QSL) when historical data for that supplier showed quality programs which did not meet specified requirements.

Corrective Steps Which Have Been Taken and Results Achieved

Transamerica Delaval, Inc. was audited by Systems Quality Assurance in July of 1985. As a result of programmatic problems identified during this audit, a restriction has been placed on this supplier pending an acceptable corrective action response. Emergency purchases may be allowed on Quality Class I and QA program applicable items, but only when source surveillance is imposed in the procurement document.

A review of procurement document files for the Guideline Instruments Company revealed that there has been no procurement activity with this supplier. Additionally, it has been determined that there is no projected procurement of services, thus this supplier has been downgraded to an inactive status. Requalification of the supplier in the future shall require an audit or survey prior to approval.

An audit was scheduled for Hayward Tyler Pump Company (HTP) in May of 1985. HTP informed GSU that they were in the process of completely revising their QA program for an upcoming ASME re-certification and that their facility was in process of being physically relocated. Based upon this notification, a restriction has been placed on this supplier for all procurement activities for Quality Class 1 and QA Program applicable items.

All current supplier files on the Qualified Suppliers List have been reviewed for similar conditions. Those with unsatisfactory performance history will be evaluated per Procedure QAI-2.4.

Corrective Steps Which Will Be Taken to Avoid Further Violations

Procedures QAI-2.4 "QA Evaluation of Suppliers/Contractors QA Programs" and QAI-2.11 "Qualified Suppliers List" have been revised and issued for implementation. The procedures were revised to specifically address the use of historical data (i.e., other users' audits and surveys, NRC IE Bulletins and Notices, Vendor Programs Branch Inspection Reports, NUREG-0040) for initial qualification and annual evaluation of suppliers. These procedures

provide specific direction as to appropriate action when historical data reflects an inadequate quality program.

Procedure QAI-2.4 now addresses use of this historical information primarily for pre-award evaluation of suppliers. If this history reveals unsatisfactory performance then the supplier will be surveyed per QAI-2.4 prior to approval.

Date When Full Compliance Was Achieved

Full compliance was achieved on August 19, 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	§	

(River Bend Station,
Unit 1)

AFFIDAVIT

W. J. Cahill, Jr., being duly sworn, states that he is a Senior 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 30th day of August, 1985.

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

My Commission is for Life.