



**GULF STATES UTILITIES COMPANY**

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August 12, 1985  
PBG- 21840  
File G9.5

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

Pursuant to 10CFR50.12, Gulf States Utilities requests temporary exemptions from 10CFR50 Appendix A General Design Criterion 2. One exemption is with regard to the seismic qualification of a single electrical panel, (1ENB\*PNL04A - Panel Board - 125dc - standby dc control supply). This exemption is requested to be in effect up to but not exceeding initial criticality. Justification for this request is addressed in Attachment 1 to this letter.

The second exemption is with regard to the seismic qualification of two air operated valves (1DFR\*AOV144 and 145) for the suppression pool pumpback system. This exemption is requested to be effective up to but not exceeding 5% of core rated thermal power. Justification for this request is addressed in Attachment 2 to this letter.

Based on the information contained in the attachments, the requested exemptions are authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest. Therefore these exemptions are justified for the time periods requested and should be granted.

Sincerely,

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

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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	§	

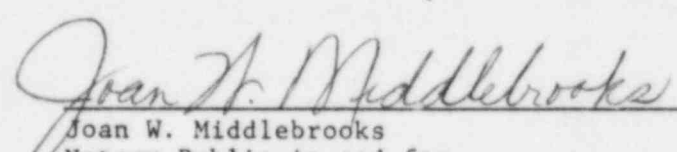
(River Bend Station,  
Unit 1)

AFFIDAVIT

W. J. Cahill, Jr., being duly sworn, states that he is a 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 12<sup>th</sup> day of August, 1985.

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

My Commission is for Life.

## ATTACHMENT 1

### Justification for Exemption

The 125v dc control panel 1ENB\*PNL04A is located in the Control Building and provides control power to the 4.2kV 1E switchgear 1ENS\*SWG1A, the 480v 1E load centers 1EJS\*LDC1A and 1EJS\*LDC2A, and the 125v dc switchgear 1ENB\*SWG01A. The pending completion of the seismic qualification testing of this panel will not endanger life or property or the common defense and security because prior to initial criticality no fission products or decay heat exist to endanger the health and safety of the public.

Also River Bend Station is located in a region of the United States of low seismicity. The probability of a seismic event approaching a Safe Shutdown Earthquake during this short period of time is extremely low.

Finally, this 125v dc control panel is similar to other panels utilized at River Bend Station that have successfully completed seismic testing. Thus there is confidence that this panel would perform its intended function even if a seismic event were to occur.

Based on the above, it is also concluded that there are no adverse environmental impacts associated with the issuance of this exemption.

Furthermore, the granting of this exemption is also in the public interest. There will be financial hardships incurred when a completed nuclear facility is delayed in startup. It is estimated that such a delay will increase the cost of River Bend Station Unit 1 by approximately \$1 million per day. The burden of these costs would adversely affect the customers and stockholders of Gulf States Utilities.

Thus, as discussed above, the temporary exemption does not affect the public health and safety and is in the public interest.

## ATTACHMENT 2

### Justification for Exemption

1DFR\*AOV144 and 1DFR\*AOV145 are air operated valves in a recently installed suppression pool pumpback system (SPPS). Installation of the SPPS (which returns water which may have leaked from the suppression pool through a passive failure) includes replacement of non-safety related sump pumps and the operators of these valves with safety-related components. The pumps have been replaced and provided with a Class 1E power supply. However, the operators of these valves have not yet been replaced. The operators have been ordered and will be installed prior to operation above 5% of full rated power. Non-safety related operators will not endanger life or property or the common defense and security during this period. Following a seismic event and the passive failure, these valves can be manually operated to provide the SPPS function within 30 minutes. Following a LOCA and the passive failure, the solenoid which controls the air supply to the operator may fail. However, this failure will cause the valve to close which is the required post-LOCA position.

Based on the above fail-safe design and/or the use of operator actions, it is concluded that there are no adverse environmental impacts associated with the issuance of this exemption.

Furthermore, the granting of this exemption is also in the public interest. There will be financial hardships incurred when a completed nuclear facility is delayed in startup. It is estimated that such a delay will increase the cost of River Bend Station Unit 1 by approximately \$1 million per day. The burden of these costs would adversely affect the customers and stockholders of Gulf States Utilities.

Thus, as discussed above, the temporary exemption does not affect the public health and safety and is in the public interest.