

APPENDIX A
NOTICE OF VIOLATION

Gulf States Utilities
River Bend Station

Docket: 50-458/85-69
License: NPF-40

During an NRC inspection conducted during the period of September 16 through October 31, 1985, two violations of NRC requirements were identified. The violations involved the failure to follow an administrative procedure for control and use of procedures. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the violations are listed below:

A. Failure of Document Control Program

10 CFR Part 50, Appendix B, Criterion V, and the licensee's approved quality assurance program, require that activities affecting the quality of safety-related systems and components be conducted in accordance with approved instructions, procedures, and drawings.

Procedure NPE-3-006, "River Bend Station Design and Modification Request Control Plan," Revision 1, states that "the design documents affected by a modification will normally be updated by the holder of the design data base as managed by NUPE."

Procedure NUPE-AA-59, "Updating and Distributing Design Documents," Revision 0, states that "updating and distributing of the Design Documents shall be handled by the Holder of the Design Data Base in accordance with GSU approved procedures."

Contrary to the above, on October 18, 1985, it was discovered that approved modification request (MR) design packages and approved field change notices (FCN) had not been posted against affected design documents and they had not been distributed to document control stations. For example, FCN 85-0397-19 was not posted against drawing 12210-FSK-5ENS06 and it was not available at the document control stations. Several other examples of the failure to post and distribute MRs and FCNs were noted.

This is a Severity Level IV violation (Supplement I.D.)(458/8569-01).

B. Improper Use of a Field Change Notice (FCN)

10 CFR Part 50, Appendix B, Criterion V, and the licensee's approved quality assurance program require that activities affecting the quality of safety-related systems and components be conducted in accordance with approved instructions, procedures, and drawings.

Procedure NPE-3-006, "River Bend Station Design and Modification Request Control Plan," Revision 1, states that a FCN is "a written instrument used to effect a change to design that does not alter the concept, function or scope of the original modification, but is needed to document errors, material availability, installation problems, etc."

Contrary to the above, on October 18, 1985, it was discovered that FCN 85-0397-19 was approved and implemented to modify the function/control logic of the diesel generator output breaker to allow remote shutdown operation from the diesel generator panel in either the normal or emergency mode.

This is a Severity Level IV violation (Supplement I.D.)(458/8569-02).

Pursuant to the provisions of 10 CFR 2.201, Gulf States Utilities is hereby required to submit to the 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 ~~19th~~ day of *Nov.*, 1985.