

## NOTICE OF VIOLATION

Gulf States Utilities  
River Bend Station

Docket No. 50-458  
License No. NPF-47  
EA 87-229

During an NRC inspection conducted on November 1-21, 1987, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the violations are listed below:

- A. Technical Specifications Limiting Conditions for Operations (LCO) 3.3.1, 3.3.2, and 3.3.3 require that the following minimum channels of Drywell Pressure-High remain operable: two channels per trip system for reactor protection system (RPS) initiation (operational conditions 1 and 2); two channels per trip system for primary and secondary containment and residual heat removal (RHR) system isolation (operational conditions 1, 2, and 3); and four channels for high pressure core spray system (HPCS) initiation (operational conditions 1, 2, and 3). With less than the minimum number of channels operable, the associated LCO action statement requirements include placing the inoperable channel (RPS or isolation actuation) and/or the trip system in the tripped condition within one hour and declaring the HPCS system inoperable.

Contrary to the above, from August 1985 to November 17, 1987 while the plant was operating in conditions 1, 2, or 3, one of two channels in one trip system for RPS initiation, primary and secondary containment isolation, and RHR system isolation were inoperable, and two of four channels for HPCS initiation were inoperable. The channels were inoperable when an instrument root valve (1RCS-V122) for a drywell pressure sensing line was closed, thereby isolating three pressure transmitters, and actions were not taken to meet the action statement requirements.

This is a Severity Level III violation (Supplement I).

- B. Technical Specification 6.8.1.d requires that written procedures shall be established, implemented and maintained for surveillance and test activities of safety-related equipment.

Step 7.7.4 of Temporary Procedure (TP) 87-25, "RPV Inservice Leakage Test," Revision 0, which provides instruction for the inservice leakage test on the reactor pressure vessel, requires that the operator secure shutdown cooling by stopping both RHR pumps and closing shutdown cooling isolation valves E12\*F053A, E12\*F053B, E12\*F008 and E12\*F009.

Contrary to the above, on November 19, 1987, step 7.7.4 of TP 87-25 was improperly signed off by the responsible shift supervisor due to confusion in the procedures, although the required valve manipulations for E12\*F008 and E12\*F009, described among other items in step 7.7.4, had not been performed.

This is a Severity Level IV violation (Supplement I).

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- C. Technical Specification, 6.8.1.a requires that procedures shall be established, implemented, and maintained for activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Paragraph 9 of Appendix A to Regulatory Guide 1.33 delineates procedures for control of modification work.

Pursuant to Regulatory Guide 1.33, Procedure ENG-3-006, "River Bend Station Design and Modification Request Control Plan," requires that if a prompt modification request (PMR) cannot be cancelled (i.e. converted to a modification request or system returned to original configuration) by the date indicated in block 23, a memorandum explaining the need for an extension and the new cancellation date must be prepared, approved and forwarded to document control for permanent retention.

Contrary to the above, on November 17, 1987, it was found during a review of the PMR status log that extension memoranda had not been approved for 16 PMRs that were not cancelled by the due date. Examples include, PMR 86-98 (due September 15, 1987); PMR 86-128 (due October 7, 1987) and PMR 87-35 (due October 23, 1987).

This is a Severity Level IV Violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Gulf States Utilities is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, and a copy to the NRC Resident Inspector, within 30 days of the date of the letter transmitting this Notice. This reply, should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation if admitted, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert D. Martin  
Regional Administrator

Dated at Arlington, Texas,  
this 3<sup>rd</sup> day of March 1988.

Gulf States Utilities

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