



GULF STATES UTILITIES COMPANY

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December 15, 1989
RBG- 31946
File Nos. G9.5, G15.4.1

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Gentlemen:

River Bend Station - Unit 1
Refer to: Region IV
Docket No. 50-458/Report 89-11

Pursuant to 10CFR2.201, this letter provides Gulf States Utilities Company's (GSU) supplemental response to the Notice of Violation contained in NRC Inspection Report No. 50-458/89-11. This inspection was conducted by Messrs. E. J. Ford and W. B. Jones during the period of March 15 through April 30, 1989 of activities authorized by NRC Operating License NPF-47 for River Bend Station - Unit 1. GSU's response to the Notice of Violation is attached.

Should you have any questions, please contact Mr. L. A. England at (504) 381-4145.

Sincerely,

J. C. Deddens
Senior Vice President
River Bend Nuclear Group

JEB/LAE/TFP/RGW/DNL/MSF/pg
Attachment *[Handwritten initials]*

cc: U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

Senior Resident Inspector
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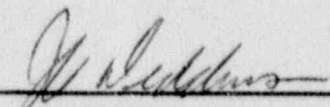
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

STATE OF LOUISIANA)
PARISH OF WEST FELICIANA)
In the Matter of) Docket No. 50-458
GULF STATES UTILITIES COMPANY) 50-459

(River Bend Station,
Unit 1)

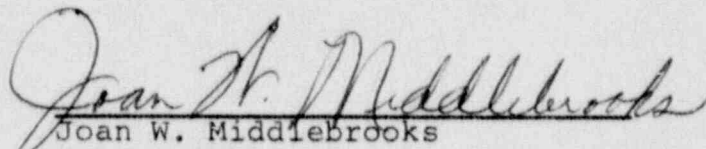
AFFIDAVIT

J. C. Deddens, 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.



J. C. Deddens

Subscribed and sworn to before me, a Notary Public in and for the State and Parish above named, this 14th day of December, 1989.



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

My Commission is for Life.

ATTACHMENT

Supplemental Response to Notice of Violation 50-458/8911-01A

A. REFERENCE

Notice of Violation - Letter from L.J. Callan to J.C. Deddens, dated May 31, 1989.

Response to Notice of Violation - Letter from J.C. Deddens to Document Control Desk, dated July 7, 1989.

VIOLATION

Criterion XVI of Appendix B to 10CFR Part 50 requires that measures be established to assure that conditions adverse to quality are promptly identified and corrected.

Quality Assurance Directive (QAD)-16, "Corrective Action," Section 4.3, states that procedures shall require that corrective action be promptly initiated and adequately documented by the responsible department to correct the condition and to determine if action is necessary to preclude its recurrence.

River Bend Nuclear Procedure (RBNP)-0047, "Corrective Action Program," Section 5.4, requires that corrective action be promptly initiated and adequately documented by the responsible department to correct the condition and to determine if action is necessary to preclude its recurrence.

Contrary to the above, adequate corrective actions were not taken to prevent repeat violations of Administrative Procedure (ADM)-0027, "Protective Tagging." During the period of March 18 through April 12, 1989, the licensee identified eleven procedural violations of ADM-0027. The corrective actions taken did not determine the extent to which protective tagging program violations existed.

REASON FOR VIOLATION

GSU has reviewed the associated protective tagging program condition reports (CR) stated in Inspection Report 89-11 and other related CRs initiated during the second refueling outage (RF2). GSU has reviewed the chronology presented in the Inspection Report and finds it accurate. The various problems identified from our review of CRs can be categorized into four major areas:

1. Individuals working without a clearance or a wrong clearance,
2. Tagging boundaries were violated,
3. Clearances were released without work being finished, or
4. Crews began work on the wrong train.

Several root causes have been identified from GSU's review. The contributing causes were attributed to poor communication between contractor work crews and their supervisors, contract personnel unfamiliarity with RBS plant design, and failure of contract personnel to take adequate precautions to follow details in RBS procedure ADM-0027, "Protective Tagging". GSU determined the primary cause was inadequate training of contract personnel to ADM-0027 requirements. In addition, the retraining provided as a corrective action was not adequate to preclude future occurrences.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND RESULTS ACHIEVED

Numerous corrective actions were taken for each RF2 CR related to protective tagging. GSU took additional actions after recognizing that previous corrective actions had not been adequate to prevent recurrence of additional tagging violations. Immediate corrective actions included:

- 1) Contract personnel responsible for the tagging violations were retrained,
- 2) Tagging procedure (ADM-0027) was revised,
- 3) Additional "tool box" and formal classroom training was conducted,
- 4) Individuals involved in violations were removed from the "Authorized Requestor" list,
- 5) GSU personnel were assigned to oversee and co-sign contractor clearances,
- 6) A 100% review of open supplemental clearances and partial releases was completed,
- 7) GSU discontinued the use of supplemental clearances for RF2,
- 8) Operations Quality Assurance surveillances were increased for safety and non-safety related work activities for review of work documentation and tagging, and
- 9) Tagging officials were retrained and instructed to give closer attention to details prior to resuming duties.

The root causes mainly focused around contractor personnel events; therefore, GSU believes the program implemented by GSU personnel is satisfactory. Supplemental clearances have been reinstated, post outage, since the contractors involved are no longer performing work on site. Contractors will not be allowed as holders of clearances under ADM-0027 pending completion of task force review activities.

CRs are sent to a wide distribution, including but not limited to Quality Assurance, Licensing, and the Independent Safety Engineering Group (ISEG). CRs are now reviewed and trended daily in accordance with a new procedure, RBNP-0052, "River Bend Station Trending Program", to determine adverse trends. The recently developed and approved trending program is designed to detect long term trends. RBNP-0052 recommends that trend reports be issued at six month frequencies. Short term trends are generally discovered through the various CR reviews and periodic trend reports issued to RBS management (typically every month).

RBNP-0022, "Root Cause Analysis Program" was issued on September 19, 1989, to standardize root cause analysis based on INPO Good Practice OE-907, "Root Cause Analysis".

A critique for lessons learned during RF2 was completed by Outage Management and a task force was formed to identify particular problems with the tagging program. A number of recommendations for the improvement of the tagging program were identified.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FUTURE VIOLATIONS

Training will be provided to all licensee personnel required to provide root cause analysis for responses to condition reports (CR). QA personnel will also receive this training as it is QA's responsibility to review CRs and other nonconformance documents.

The following corrective actions were identified in the RF2 critique and by the task force formed to review the existing tagging program:

1. Revise ADM-0027 to:
 - a. Follow the format of INPO Good Practice OP-203, which logically presents clearance requirements and necessary actions.
 - b. Have consistent clearance program "terms and definitions".
 - c. Clarify responsibilities of the Assistant Plant Managers, departmental supervisors, authorized Tag Order Requestors, tagging officials, Shift Supervisors, Control Operating Foremen, designated operators and Maintenance Training Coordinator as they are applicable to the tagging program.
 - d. Allow supplemental clearance release on a partial basis by signing a partial release form.
2. Allow only GSU employees trained on ADM-0027 to hold clearances during RF3. However, contract employees brought on-site who receive documented training, including on-the-job experience with the protective tagging system under the supervision of a qualified Tag Order Requestor, and demonstrate the necessary level of skill to successfully implement the tagging program may be allowed to hold clearances. This requirement will be re-evaluated for future outages.
3. Computerize the clearance program to reduce the administrative burden on operations and to increase productivity of the maintenance/contractor work force. Operations, Computer Systems and Projects will coordinate the development of the computerized system.

These actions are currently being planned and implemented by GSU.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

1. Root Cause Analysis training will be completed by May 1, 1990.
2. ADM-0027, Revision 8, was submitted for review on November 9, 1989, and will be approved by April 1, 1990.
3. Training on ADM-0027, Revision 8, will be completed within 30 days of the issuance of the procedure.
4. Implementation of the new computerized tagging system will be achieved by June 30, 1990.