

GULF STATES UTILITIES COMPANY

POST OFFICE BOX 2951 . BEAUMONT. TEXAS 77704 AREA CODE 713 838-3843

> January 12, 1981 RBG - 9477 File Code G9.5

Mr. W.C. Seidle, Chief Reactor Construction and Engineering Support Branch U.S. Nuclear Regulatory Commission Office of Inspection & Enforcement-Region IV 611 Ryan Plaza Drive, Suite 1000 Arlington, Texas 76011

Dear Mr. Seidle:

River Bend Station-Unit 1 Refer to: RIV Docket No. 50-458/Rpt. 80-12

Attached is Gulf States Utilities (GSU) Company's response to Inspection Report 80-12. We have reviewed the two violations in the Inspection Report against the NRC's recently "Proposed General Statement of Policy and Procedure for Enforcement Action" contained in Federal Register Volume 45, No. 196 dated October 7, 1980. Based on this review and our belief that these two violations are of only minor significance, GSU requests that you reclassify these violations as severity level VI items.

Also, with regard to the response time allowed for violations, GSU requests that the time required to submit a written response be related to the date of receipt instead of the date of the notice of violation. In this instance, the notice of violation was dated December 8, 1980, but GSU did not receive it through the mail until December 15, 1980. This effectively reduced our time to respond from 25 days to 18 days. Because of this short response time, GSU requested and was granted a week extension to respond.

Thank you for giving these matters your attention Please address any additional inquiries on Inspection Report 80-12 to ma.

Sincerely,

E. finn Draps ingge B

E. Linn Draper, Jr. Vice President Nuclear Technology

Attachment WJR/te



NOTICE OF VIOLATION ITEM a:

<u>COMMENTS</u>: The S&W FQC Inspector present on concrete placement No. SC4-W-85-7 was questioned as to the adequacy of light in the placement and responded that additional lighting was not necessary for verification of correct concrete placement techniques. Other similarly dimensioned wall placements have been checked for adequacy of light and it was found that with only natural lighting, visibility at the bottom of the placement was adequate. Although GSU believes that the lighting in this particular case was adequate, we recognize the subjectivity of the judgement involved and have taken the following actions to further assure proper placement and inspection of concrete:

ACTION TAKEN AND RESULTS ACHIEVED: Finish inspection of placement SC4-W-85-7 shows no signs of improper concrete placement.

ACTION TAKEN TO AVOID FURTHER VIOLATIONS: S&W FQC has instructed all concrete inspectors to request additional lighting be provided by S&W Construction when needed, to utilize hand held lights when necessary and to perform inspections from inside placements when accessible. S&W Construction has instructed concrete supervisors to assure that sufficient lighting is provided to illuminate all areas of the concrete placements.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED: All instructions issued in writing and in full compliance as of January 1, 1981.

NOTICE OF VIOLATION ITEM b:

in ter

<u>COMMENTS</u>: When the FQC Inspector became aware that the addition of water had exceeded the amount allowed, he was unable to take immediate corrective action because the concrete had already been placed. He then contacted his supervisor, who determined that the water-cement ratio had not been violated. Inspection Report #S0006871 was written for the procedural violation.

This activity presented a potential problem in that concrete was placed when, according to procedure, it should have been rejected. Review of this incident brought out the following facts:

- 12 gallons of water instead of the allowable 10 gallons were added at the discharge point;
- calculations of the water-cement ratio utilizing ACI 211-74 paragraph 6.2.8 resulted in a water-cement ratio of 0.393; and
- 3) design maximum water-cement ratio for the mix was 0.394.

Therefore, the over addition of 2 gallons (i.e., 12 gallons instead of 10 gallons) of water did not result in a design violation or loss of concrete integrity.

ACTION TAKEN AND RESULTS ACHIEVED: During the normal FQC review of batch tickets only two other over additions of water have occurred in the past year, neither of which resulted in poor quality concrete. A random review by S&W QA for batch tickets from October to December 1980 found no other violations. It is, therefore, believed this is not a generic problem, but rather an extremely infrequent occurrence with no safety significance.

ACTION TAKEN TO PREVENT FURTHER VIOLATION: S&W Construction has reinstructed concrete supervisors that no water is to be added to concrete trucks in the field in excess of the water withheld at the batch plant as indicated on the batch ticket. S&W FQC has reinstructed inspectors that if over addition of water occurs as denoted on the concrete truck batch ticket the truck is to be rejected.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED: Presently in compliance.