GULF STATES UTILITIES COMPANY

RIVER BEND STATION POST OFFICE BOX 220 ST. FRANCISVILLE, LOUISIANA 70775

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

Gentlemen:

River Bend Station - Unit 1
Refer to: Region IV
Docket No. 50-458/89-04

Pursuant to 10CFR2.201, this letter provides Gulf States Utilities Company's (GSU) response to the Notice of Violation for NRC Inspection Report No. 50-458/89-04. The inspection was conducted by Mr. Cummins, et. al. during the period of September 18 - October 17, 1989 of activities authorized by NRC Operating License NPF-47 for River Bend Station - Unit 1. GSU's response to the violation is provided in the attachment and is being submitted at this time per agreement with your Mr. D. Chamberlain on January 12, 1990.

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

Sincerely,

J. E. Booker

J. E. Booker
Manager-River Bend Oversight
River Bend Nuclear Group

JEB/LAE/DNL/JWC/TFP/FRC/ch

Enclosure

cc: U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
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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)
(River Bend Station - Unit 1)

AFFIDAVIT

J. E. Booker, being duly sworn, states that he is Manager-River Bend Oversight for 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; that he has read all of the statements contained in such documents attached thereto and made a part thereof; and that all such statements made and matters set forth therein are true and correct to the best of his knowledge, information and belief.

J. E. Booker

Subscribed and sworn to before me, a Notary Public in and for the State and Parish above named, this 19th day of January, 1990. My Commission expires with Life.

Claudia F. Hurst
Notary Public in and for
West Feliciana Parish, Louisiana

ATTACHMENT

RESPONSE TO NOTICE OF VIOLATION 50-458/8904-02
LEVEL IV

REFERENCE

Notice of Violation - Letter from S. J. Collins to J. C. Deddens, dated December 15, 1989.

FAILURE TO FOLLOW EQUIPMENT CONTROL AND MAINTENANCE PROCEDURES

River Bend Station Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained as recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, Appendix A, paragraph 1.c, requires that administrative procedures be developed for equipment control; and paragraph 9.e requires general procedures to be developed for control of maintenance, repair, replacement, and modification work.

Three instances were identified in which licensee personnel failed to follow control procedures that had been implemented in accordance with the above requirements.

1. River Bend Station Operating Procedure ADM-0027, Revision 7, "Protective Tagging," paragraph 3.6, states that a clearance requester "may also be by title (i.e., Shift Supervisor, Control Operator Foreman, Maintenance Foreman, etc.) as long as they comply with Step F.1 of Attachment 7 of this procedure." Attachment 7, Step F.1 states: "CHECKED AND ACCEPTED - Signature of the person to whom the Clearance is issued, after that person has checked the tags and is satisfied the equipment is safe to work on."

   Contrary to the above, on October 4, 1989, the inspector observed that a mechanical maintenance foreman directed his maintenance crew to perform work on the penetration valve and main steam isolation valve (MSIV) leakage control system under Maintenance Work Order (MWO) R130425 before indicating that he had checked the tags and was satisfied that the equipment was safe to work on by properly signing the clearance order. After the system had been breached, the foreman improperly executed the clearance order by "back-timing" the signature to a time before the maintenance commenced.

2. River Bend Nuclear Station Procedure ADM-0027, "Protective Tagging," paragraph 5.21, requires that "fluid or gas systems that operate with temperatures greater than 200 degrees F or pressures greater than 50 psig should be isolated from the work area by two closed valves in series, with a tell-tale vent or drain open between the isolation valves."

   On September 27, 1989, a technician performed maintenance to install an in-line air filter to ASCO solenoid air supply valve to Damper 1HVP*AOD 11A (under MWO R134876). The MWO was in response to Condition Report 88-0923, which identified the need to provide air filtration to safety-related ASCO solenoid valves to comply with Table 9.3-4 of the River Bend Updated Safety Analysis Report.

Contrary to the above, the clearance conditions prescribed by Procedure ADM-0027 were not established for the maintenance activities performed under MWO R134876. The technician set the isolation conditions of the instrument air supply to the solenoid valve by using tags under Procedure GMP-0042, Attachment 2, "Lifted Lead and Jumper Tag Sheet." The instrument air supply to the ASCO solenoid operated at a pressure of 110 psig.

3. River Bend Station Operating Procedure ADM-0023, Revision 8, "Conduct of Maintenance," paragraph 5.2.1, states: "Maintenance personnel shall adhere to instructions of approved work documents." River Bend Station Operating Procedure ADM-0028, Revision 10, "Maintenance Work Order," paragraph 5.12.24, states: "The individual performing the work will: Follow the job plan in detail (not necessarily in sequential order unless specified) and initial the items as they are performed and reperformed."

   Prompt MWO 56.53, dated April 11, 1989, required inspection and retorquing of yoke and bonnet bolts on residual heat removal (RHR) "A" test return valve, 1E12*MOVF924A. Revision 1 to the MWO required cleaning of the valve stem. At Step 6: "Check for bent stem at time of stroking. If bent stem return package to Field Engineering Codes and Standards for further work. Use dial indicators (2) on each at 90 degrees and stroke valve. Record maximum run-out in both planes." A hold point was included at the step for quality control action.

   Contrary to the above the run-out check with dial indicators for bent stem was not performed during the performance of the work on April 11, 1989. This step was marked "N/A." No remarks were included in the work plan to explain why the work was not performed.

REASON FOR THE VIOLATION

1. A day shift mechanical maintenance foreman was observed directing his maintenance crew to perform work under MWO R130425 before indicating that he had checked the tags and was satisfied that the equipment was safe to work on by having signed the clearance order. The clearance order was later observed to have been "back-timed" to before commencement of maintenance work.

   The day shift foreman later stated that he had checked the adequacy of the clearance shortly after coming on shift but had forgotten to go to the control room to sign the clearance sheet. The plant security computer verified this statement along with the testimony of a mechanic at the skid. The station's clearance procedure clearly states that the clearance sheet be signed as accepted prior to becoming valid. The clearance had, however, been checked and accepted by the previous shift's foreman working the same MWO package; allowing the clearance to become valid. This incident occurred because the day shift foreman placed the time that he did the field verification rather than the time when he actually signed the clearance sheet. The governing procedure ADM-0027 does not specify what time to record, however general practice has been to put the time that the clearance sheet is signed and not the time of the inspection. As this clearance had already been accepted on night shift and at the time of turnover the system was already breached, there was never a safety concern.

2. Technicians were observed isolating an air line to a solenoid valve to perform maintenance without the use of a clearance order. Technicians did employ GMP-0042 to document the configuration of the root valve isolating the solenoid.

   GMP-0042 is routinely employed by technicians to document configuration changes performed during maintenance activities. The procedure has established itself as an excellent tool for controlling plant configuration while performing maintenance. The technicians in this instance were observed correctly using this procedure to document lifted leads and closure of instrument root valves to rework the solenoid valve in question.

   Foremen are required to ensure proper isolation and tagging for employee protection prior to start of work. The intent of the statement "200°F or pressures greater than 50 psig" referenced in the violation was to cause personnel to employ double valve protection while working on high energy systems. Discussions with personnel involved in this incident, however, showed both workers and foremen to be in agreement that the work could safely be performed without need of a clearance. This is in compliance with the requirements of ADM-0027 because a safety hazard did not exist. GSU management believes that even though no procedural violation was committed, closer attention to potential hazards needs to be employed by persons supervising jobs.

3. While performing maintenance on valve 1E12*MOVF024A (MWO R056253), a step that required checking for a bent valve stem was N/A'd without explanation. This appeared to be in violation of station administrative procedures which required performing the job steps as written.

   The MWO was written to identify a condition where the valve yoke to bonnet bolts were loose, thus requiring retorquing of the bolts and an inspection of some valve components to verify that no damage had occurred. Part of the inspection was to verify that the valve stem was not bent. The NRC inspection report correctly stated that the step was not performed but was N/A'd with a short statement stating "No Work Performed." The post-maintenance test section of the MWO did indicate, however, that during the functional test the stem was checked during stroking of the valve. The functional test being signed "SAT" implies no need to perform step No. 6 of the MWO; therefore the "N/A" was appropriate.

   It did become apparent to GSU during the NRC maintenance team inspection that the N/A'ing of work steps without clear written justification was a weakness in the documentation of corrective maintenance.

CORRECTIVE ACTIONS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

1. The Foreman was counseled on this incident and cautioned to employ more care in the future.

2. The day that this incident was reported, a memorandum was sent to maintenance personnel cautioning them to employ greater care when working jobs with potential safety hazards. Technicians were also cautioned to not use GMP-0042 in lieu of a safety clearance when safety hazards are present.

3. ADM-0028 was revised to require a written explanation by workers for N/A'ing job steps. The steps must also be initialed by the worker and reviewed by the maintenance foreman for concurrence.

CORRECTIVE ACTIONS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

ADM-0027 is in the process of being revised and the areas affected by Item 1 will be clarified. To improve maintenance technicians' compliance with existing station procedures, maintenance management has increased its attention to work activities through frequent inspection of work in progress. In addition, maintenance management is reviewing selected completed MWO packages to verify that personnel are providing required documentation of work activities. Problems noted during these inspections result in critiques involving the technicians, planners, foremen, and supervisors, as required, to ensure that identified problems are corrected. It is expected that these inspections will have the effect of improved attention to detail and compliance with station programs.

With regard to procedural compliance in general, a number of instances of noncompliance have been identified by River Bend Station (RBS) personnel via the Condition Report program and other programs. The Senior Vice President issued on January 9, 1990 to all RBS managers a memo instructing them to hold meetings with management personnel down to the supervisor/foreman level, stressing the importance of procedural compliance and the necessity to reduce the incidence of noncompliance.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

GSU has implemented increased inspections of maintenance activities by its Maintenance Management.

ADM-0027 will be revised by April 1, 1990.