



GULF STATES UTILITIES COMPANY

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

Gentlemen:

River Bend Station - Unit 1
Refer to: Region IV
Docket No. 50-458/89-200

During the weeks of October 23-27 and November 13-17, 1989, the NRC conducted its Vendor Interface and Procurement Team Inspection headed by your Mr. R. P. McIntyre at River Bend Station - Unit 1. Gulf States Utilities Company (GSU) is providing this letter as an interim status of the actions discussed during the exit meeting on November 17, 1989 pending receipt of your inspection report.

FINDING NUMBER 1

The inspection team identified four instances in which they determined that GSU failed to specify the provisions of 10 CFR Part 21 as being applicable on purchase orders (PO) for items intended for use in safety-related applications because the POs specified that the components or items purchased must be provided in accordance with nuclear specifications or specific quality assurance requirements. The first was for a potentiometer manufactured by NEI Peebles and purchased from Transamerica Delaval in 1985. 10 CFR Part 21 should have been invoked in this PO. This same item was procured in another PO later the same year and correctly invoked 10 CFR Part 21 and 10 CFR Appendix B. GSU has determined that this is an isolated incident of a procurement engineer failing to make the proper commercial grade determination.

The second purchase was for a power supply manufactured by Del Electronics for general industry use and procured from Sorrento Electronics. Discussions and research with Sorrento reflect that there are no modifications or conditioning performed on the power supply to make it only for use in the nuclear industry. GSU has determined that the item meets the definition of a CGI and was purchased correctly as a CGI. The third purchase was for a circuit breaker from Square D Company. The PO invoked the requirements of the Stone & Webster specification, as well as, 10 CFR 50 Appendix B and 10 CFR Part 21. The invocation of these requirements was appropriate. Because Square D was requested to and did provide a statement identifying the breakers as commercial grade items does not negate Square D's certified compliance with the dedication and reporting requirements of 10 CFR Part 21. GSU has determined that this items was correctly procured.

The fourth purchase was for the same breaker part number discussed above, except that no nuclear specific or 10 CFR Part 21 requirements were invoked in the PO. The breaker was determined to be a CGI based upon the available information and the commercial grade statement previously provided under the above PO. GSU has determined that this item meets the definition of a CGI and was procured appropriately.

FINDING NUMBER 2

The inspection team determined that GSU had failed to receive, evaluate and implement recommended corrective actions for the Division III emergency diesel generator from General Motors Electromotive Division (GM-EMD). As a result, a limited number of "Power Pointers" and "Maintenance Instructions" were received by GSU for review.

This situation arose because there were many different organizations involved in the processing of the paperwork associated with this diesel generator during construction and early operation of River Bend Station. General Motors Electromotive Division manufactured the Division III diesel engine used at River Bend Station. Stewart & Stevenson Services Incorporated, the authorized distributor for GM-EMD at the time the engine was procured, supplied the diesel engine to General Electric (GE). GE was the original supplier of the diesel engine to GSU. During plant construction, M-K Power Systems Division provided certain modifications to the diesel engines. Stone and Webster Engineering Corporation, the River Bend Station architect/engineer, received the documentation from GE and entered it into the vendor technical information system.

Since then, General Motors has named M-K Power Systems Division as the only authorized distributor of EMD parts and services to the nuclear industry. GSU has notified M-K Power Systems Division and has been placed on their mailing list for updated documents and has obtained the latest Maintenance Instruction Index and entered it into the vendor technical information program (VTIP). GSU will review this index and identify those documents which are not contained in GSU's document system, obtain these documents from M-K, review these documents for applicability to River Bend Station, and enter the documents into the VTIP system. Additionally, GSU is in the process of obtaining the appropriate Power Pointers and when these are received, they will be processed through the VTIP system.

FINDING NUMBER 3

The inspection team also determined that GSU did not always perform timely evaluations of Information Notices (IN) received from the NRC. Presently there are 40 of 734 INs issued prior to 1989 that have not received complete evaluations. GSU intends to review these 40 INs by September 30, 1990. The remainder of the INs will be reviewed for applicability, prioritized and scheduled for complete review in a timely manner.

FINDING NUMBER 4

The inspectors identified several examples where GSU installed commercial grade items (CGI) in safety-related systems where they believed GSU had not adequately evaluated their suitability for use in such applications. GSU has identified all commercial grade purchases made for River Bend Station from January, 1985 to the present. A task force has been established to determine the types of reviews to perform on these POs to determine suitability for use in safety-related applications and to determine the amount of effort this process will require. Recommendations of this task force will be forwarded to River Bend Station management. Management will evaluate these recommendations and provide you a status by March 15, 1990.

GSU has begun corrective actions for the specific discrepancies identified by the inspection team. The discrepancies were placed in one of four categories: 1) Documentation needs to be revised or action performed, 2) A commercial grade survey needs to be performed, 3) Additional testing needs to be performed, or 4) Additional documentation needs to be obtained from the vendor.

Seventeen of twenty items requiring documentation revision have been successfully completed with satisfactory results and it is estimated that the remaining items will be completed by April 1, 1990. Three of the six items requiring commercial grade surveys have been performed and the results of the surveys were satisfactory. Concerning the three remaining items, all existing stock will be evaluated for acceptability as part of the task force effort and future purchases of these items will be made from suppliers capable of providing the materials in accordance with 10 CFR 50, Appendix B and 10 CFR 21.

Of the items requiring additional testing, the dedication verification activities for three of the five items have been identified and are awaiting testing by GSU quality control. The remaining two items are being returned to a testing lab or the supplier for testing. It is expected that these items will be completed by June 1, 1990. Three out of four items requiring additional vendor information have been completed and found acceptable. GSU is waiting for a copy of a purchase order from the vendor to complete the final item. It is estimated that the PO will be received by February 23, 1990. Of the reviews completed, no hardware deficiencies affecting plant safety were identified.

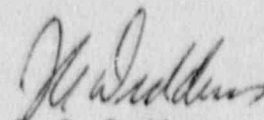
In addition to continual improvements since 1985, GSU has further enhanced the CGI dedication program for River Bend Station in accordance with the Electric Power Research Institute (EPRI) industry initiative. This program has been implemented in accordance with a recently issued River Bend Nuclear Procedure (RBNP) and applicable lower-tier procedures. These

establish the guidelines for the procurement and control of commercial grade replacement items for use in safety-related equipment. GSU believes that this program will result in a more definitive program for the dedication of CGIs for use in safety-related applications.

GSU believes that the CGI dedication program at River Bend Station has evolved concurrent to industry practices and currently encompasses industry guidelines. Our goal was, and remains, to assure adequate protection of the health and safety of the public consistent with our understanding of the requirements.

Should you have any questions, please contact Mr. D. N. Lorring of my staff at (504) 381-4157.

Sincerely,



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

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