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July 7, 1981

RBG- 10712 File Nos. G9.5 G15.4.1

Mr. G. L. Madsen, Chief Reactor Projects Branch U. S. Nuclear Regulatory Commission Region IV Office of Inspection & Enforcement 611 Ryan Plaza, Suite 1000 Arlington, Texas 76011

Dear Mr. Madsen:

River Bend Station-Unit I Refer To: RIV Docket 50-458/Rpt. 81-06

This letter responds to the Notice of Violation contained in your I&E Report No. 50-458/81-06. According to this report it was felt that certain activities were not conducted in full compliance with NRC requirements. Specifically, it was felt that the unit weight value listed as the minimum acceptable density corresponding to sixty percent relative density represented a blanket approval of that value. This was felt to be contrary to the specification requirement to review corresponding in-place density tests on a case by case basis.

The Preliminary Safety Analysis Report (PSAR) commitment stated (page 2.5-48b Amendment 8 - 6/7/74), "It is planned that all seismic Category I structural backfill be compacted to obtain 70 percent relative density (with the minimum acceptable relative density being 60 percent). However, the day to day field control will be by a percentage of maximum vibratory table density."

The specification implemented this commitment by requiring "...a high percentage of the fill is placed in excess of 70 percent relative density. Occasional test results indicating densities between 60 and 70 percent relative density may be accepted on a case by case basis by the Lead Geotechnical Engineer. During the placement of the backfill, the S&W Geotechnical Liason Engineer at the site reviewed the test data daily. The acceptance criteria was based upon the most conservative of the latest 50 minimum and maximum density test curves. The field unit weight which corresponds to 60 percent relative density was determined from the most conservative of the latest 50 tests, and was the field acceptance value. The 60 percent value, when used with the other 49 minimum and maximum test results, always correlated to greater than 60 percent relative density, and generally correlated to greater then 70 percent relative density. After approximately every ten tests, the relative density curves were updated to reflect the latest data, and any tests below 70 percent relative density were reviewed. A 60 percent relative density was considered the accept/reject criteria and the 60 to 70 percent range was utilized as an "early warning" notification of potential problems for the engineers to evaluate. This method is consistent with the requirements of both the PSAR and the specification.

The results of the completed test program confirm the adequacy of the criteria. The average calculated relative density was 94 percent with only 5 tests results falling between 65 and 70 percent. No test fell below 65 percent out of almost 400 tests, and no fill that was initially accepted based upon the field control acceptance criteria was ever subsequently rejected on the basis of complete testing. The updated relative density curves that were generated during the backfill placement are currently held by S&W in Cherry Hill.

All Category I backfill is complete at this time. Gulf States Utilities feels that we are in full compliance with our commitments and that no further action or corrective action is required. We trust that this clarifies any concerns that you may have had.

Sincerely Draper.

Vice President Nuclear Technology

ELD/LAE/kt

## UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

STATE OF TEXAS	1
COUNTY OF JEFFERSON	1
In the Matter of	Docket Nos. 50-458
GULF STATES UTILITIES COMPANY	\$0-459
(River Bend Station,	٥

## AFFIDAVIT

J. G. WEIGAND, being duly sworn, states that he is a 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.

Subscribed and sworn to before me, a Notary Purlic in and for the

State and County above named, this 7th day of Guly

VINNIN

,1981.

Notary Public in and for Jefferson County, Texas

My Commission Expires:

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2/10/85