



GULF STATES UTILITIES COMPANY

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June 7, 1993
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U.S. Nuclear Regulatory Commission
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Washington, D.C. 20555

Gentlemen:

River Bend Station - Unit 1
Docket No. 50-458

The purpose of this letter is to revise a commitment made by Gulf States Utilities Company (GSU) in River Bend Station (RBS) Licensee Event Report (LER) 93-008, "Improperly Prepared Relief Request for In-Service Testing Program Results in Non-Compliance with Main Steam Isolation Valve Testing Requirement," dated June 1, 1993. As stated in LER 93-008:

"On April 29, 1993, with the plant in Operational Condition 4 (Cold Shutdown), an investigation was initiated due to an apparent conflict between GSU's Safety Evaluation Report (SER) concerning the in-service testing (IST) program for pumps and valves and the River Bend IST Program Plan. Part of the SER, relief request (RR) #40, is worded such that it requires MSIV testing every cold shutdown. This is in conflict with the IST Program Plan. However, since it is part of the SER, it is required pursuant to Technical Specification 4.0.5. During a cold shutdown in December 1992, the MSIV testing requirement was not met. Therefore, GSU has concluded that this event is reportable pursuant to 10CFR50.73(a)(2)(i)(b) as a condition prohibited by the Technical Specifications.

The root cause has been determined to be personnel error when testing frequency changes were processed on relief request #40 leaving in the word 'every.' This implied that we would perform this testing every cold shutdown contrary to the direction given in our IST Program Plan. Because of this error, the relief request required performance every cold shutdown and caused a failure to comply in December 1992.

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Relief request #40 has been revised to address the error and to add the new requirements for additional MSIV exercising. This will prevent recurrence. Until this revision of the relief request is reviewed and approved by the NRC, RBS will perform a fast full stroke exercise test every cold shutdown."

Further evaluation of the applicable MSIV testing requirement provides insight as to the intent of RR #40 (more correctly Cold Shutdown Justification Request No. 40). ASME Section XI Subsection IWV-3411, "Test Frequency" states "Category A and B valves shall be exercised at least once every 3 months except as provided by IWV-3412 (a), IWV-3415, and IWV-3416." IWV-3412 (a) states "Valves that cannot be exercised during plant operation shall be specifically identified by the Owner and shall be full stroke exercised during cold shutdowns." Request #40 was generated as a result of this requirement. The MSIV testing frequency for fast full stroke testing during cold shutdown is as follows:

- For intervals of 3 months or longer - exercise during each shutdown.
- For intervals of less than 3 months - full stroke exercise is not required unless 3 months have passed since the last shutdown exercise.

Thus, for the current cold shutdown GSU meets the criterion of IWV-3412 (a) as required by IWV-3411 without stroke testing the MSIVs. The commitment to "test MSIVs every cold shutdown until the new relief request is approved by the NRC" is unnecessarily conservative and did not fathom the true scope of applicability with respect to the potential for back to back cold shutdowns.

Also, the recent failure of the MSIV to fully stroke was attributed to valve disk rotation in the steam flow. Since there has been no appreciable steam flow since the fast stroke test completed on May 25, 1993, no damage or degradation of the valves would be detected by performance of another fast stroke test prior to startup. In addition, fast stroke testing of the MSIVs during cold conditions is possibly detrimental to the valve seat and poppet seat. Another fast stroke test at this time would provide little useful information concerning the valve condition and may, in fact, be harmful to some degree.

The commitment should be revised to read:

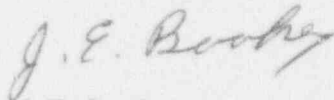
GSU will fast full stroke exercise MSIVs in accordance with ASME Section XI Subsection IWV-3411 as prescribed in Cold Shutdown Justification Request #40.

This will allow GSU to meet the true intent of Request #40 with respect to MSIV testing. GSU will revise LER 93-008 to reflect this revised commitment.

Due to the anticipated startup of RBS this week, GSU requests NRC concurrence with this commitment revision by close of business June 9, 1993.

If you have any questions or desire further information, please contact Mr. L.L. Dietrich of my staff at (504) 381-4866.

Sincerely,



J.E. Booker
Manager - Safety Assessment
and Quality Verification



GMD/LLD/kvm

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