

APPENDIX

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-458/90-19

Operating License: NPF-47

Docket: 50-458


Licensee: Gulf States Utilities (GSU)
P.O. Box 220
St. Francisville, Louisiana 70775

Facility Name: River Bend Station (RBS)

Inspection At: RBS, St. Francisville, Louisiana, and Region IV office

Inspection Conducted: July 23-27, 1990, Onsite
July 30, 1990, Inoffice


Inspector:


H. F. Bundy, Reactor Inspector, Test Programs
Section, Division of Reactor Safety

8/7/90

Date

Approved:


W. C. Seidle, Chief, Test Programs Section
Division of Reactor Safety

8/7/90

Date

Inspection Summary

Inspection Conducted July 23-27 and July 30, 1990 (Report 50-458/90-19)

Areas Inspected: Routine, announced inspection of surveillance procedures and records.

Results: The Technical Specifications (TS) required surveillances were being properly scheduled and performed in accordance with the schedules. The scheduling was comprehensive and was considered a strength. An accurate TS requirement to surveillance test procedure (STP) matrix existed. Administrative controls were appropriate and functional. Although the STPs appeared to be technically correct, the inspector identified certain weaknesses in the descriptive information they contained. The records were generally complete and of high quality. However, the inspector identified weaknesses in the comments included in the procedure data package cover sheets. The licensee committed to performing an investigation to determine if there are continuing problems with the comments section of procedure data package cover sheets. Also, the results of the more complex STPs were difficult to understand because of extensive comments and the lack of a test summary in the data package.

No violations or deviations were identified.

DETAILS

1. PERSONS CONTACTED

GSU

- *K. M. Banes, Specialist, Planning and Scheduling
- *J. E. Booker, Manager, Nuclear Industry Relations
- *B. Chustz, Supervisor, Maintenance Support
- J. Cook, Technical Assistant, Licensing
- *J. C. Deddens, Senior Vice President
- *P. D. Graham, Plant Manager
- *J. Hamilton, Director, Design Engineering
- *G. K. Henry, Director, Quality Operations
- *G. R. Kimmell, Director, Quality Services
- *D. N. Lorfing, Supervisor, Nuclear Licensing
- *J. C. Maher, Engineer, Licensing
- C. Miller, Senior Compliance Analyst
- *W. H. Odell, Manager Oversight
- *T. F. Plunkett, General Manager, Business Systems and Oversight
- J. P. Schippert, Assistant Plant Manager, Operations, Radwaste, and Chemistry
- *J. C. Spivey, Senior Quality Assurance Engineer
- *K. E. Suhrke, General Manager, Engineering and Administration

NRC

E. J. Ford, Senior Resident Inspector

OTHERS

*W. L. Curran, Site Representative, Cajun Electric Cooperative

2. SURVEILLANCE PROCEDURES AND RECORDS (61700)

The purpose of this inspection was to ascertain whether the surveillance of safety-related systems and components was being conducted in accordance with approved procedures as required by the TS. Pursuant to this objective, the inspector reviewed the following licensee documents:

- o Procedure ADM-0015, Revision 13, TCN 90-0384, "Station Surveillance Test Program"
- o RBS Organization Charts Manual, dated July 10, 1990
- o RBS TS Surveillance Test Procedures Cross-Reference Matrix, approved January 22, 1990
- o Surveillance Weekend Schedule, July 13 to July 16, 1990

- o Surveillance Test Scheduling and Tracking System Schedule Log from July 22, 1990, to August 12, 1990, printed July 18, 1990
- o Surveillance Test Schedule Daily (48 hours) Schedule Complete/Overdue Status - July 23, 1990
- o Surveillance Test Scheduling and Tracking system Exception Report - Dated July 23, 1990
- o Surveillance Test Scheduling and Tracking system Overdue Report - Dated July 23, 1990
- o Scheduled Complete Date is Within the Next 48 Hours or Has Passed Schedule Window Report, Dated July 23, 1990
- o Drop Dead Date on Surveillance Test Priority Report, Dated July 23, 1990

The inspector then selected certain TS surveillance requirements and reviewed the associated licensee STPs and an appropriate number of test result records for each procedure. Also, selected test personnel were verified to have appropriate qualifications. The TS surveillance requirements, together with the associated procedures reviewed by the inspector, are tabulated in the Attachment.

The inspector determined that TS surveillances were being properly scheduled and were being performed in accordance with the schedules. The scheduling was comprehensive and was considered a strength. The inspector was favorably impressed by the numerous event related scheduling sorts and exception reports. The TS to procedure matrix appeared accurate. Administrative controls were appropriate and functional. Although the STPs appeared to be technically correct, they were not very informative as to what was to be accomplished and how it was to be accomplished. General comments on procedure quality are as follows:

- o A general description of the test method would have been useful for the more complex STPs.
- o A description of how the STP related to the TS was generally lacking. In many instances, numerous TS were referenced under purpose. However, when a TS acceptance criterion was identified in the data, it was not referenced to a specific TS.
- o Procedure ADM-0015 had two partial revisions and a temporary change notice attached. This made it difficult to read.
- o There was a dichotomy in Procedure ADM-0015 regarding documentation of test exceptions involving acceptance criteria. Definition 3.12 stated that a test exception shall not violate an acceptance criterion. Requirements 5.8.1 and 5.8.2 were consistent with this definition. However, requirement 5.15.2 stated that a test may be "acceptable with

comments" if acceptance criteria have not been met for all components/subsystems/loops and those failures have been identified as test exceptions. This practice was being followed in documenting test results notwithstanding the fact that these test exceptions were not consistent with the definition.

The records were generally complete and of high quality. No deficiencies, which invalidated test results, were identified. However, a number of documentation problems and potential improvement items were observed as follows:

- o The results of the more complex tests, such as the 18-month emergency core cooling system test, were very difficult for the reviewer to comprehend. For instance, for STP 309-0602, completed on May 19, 1989, it was necessary to sort out 37 comments. It would facilitate review if the test director included a test summary in the package.
- o Some of the testers did not provide adequate comments on the data package cover sheets to explain test results. Examples follow:
 - STP-050-3700, performed on March 16, 1990, contained the following comment: "This procedure was performed during the mid cycle outage of Cycle 3." The shift supervisor had circled Operational Condition 4. This was confusing because Prerequisite 6.1 required the reactor to be operating and the data indicated it was at power. It turned out that the data had been gathered the previous day.
 - There were several instances where only partial tests were performed without appropriate notation in the comments. Examples follow:
 - + STP-057-0401, completed on December 7, 1989
 - + STP-256-0202, completed on April 2 and May 1, 1990
 - + STP-251-3701, completed on January 28, 1988
 - The procedure data package cover sheet for STP-251-3701, completed on December 8, 1987, did not have a notation indicating that certain nozzles in Deluge Sprinkler System WS-8D and -8H had failed to meet the acceptance criterion in the as-found condition. However, individual data sheets indicated these failures and references were made to Maintenance Work Orders R055839 and R055852, respectively. Although they were not identified in the data package, applicable Limiting Condition for Operation Tracking Entries 87-0605 and 87-0611 were also located. The data package did contain acceptable retest data sheets for these nozzles. The inspector observed that the data package cover sheet should accurately reflect the as-found condition of tested equipment and appropriate references to corrective action documentation should be made.

During a telephone conversation with licensee representatives held subsequent to the inspection, the inspector and his section chief mentioned the substantial number of discrepancies identified in the comments section of procedure data package cover sheets. The GSU representatives indicated they would conduct a review to determine if there are continuing problems with the comments section of procedure data package cover sheets. The NRC representatives also discussed the licensee's policy of not initiating a condition report each time a failure to meet a TS acceptance criterion is encountered. The GSU representatives explained that the shift supervisor will evaluate the need for a root cause evaluation and determine if a condition report is required. The NRC representatives stated that these issues will be revisited during future inspections.

- o Printed names of the performers were not found in the data package for STP-053-3001, completed on July 5, 1990, as required by Procedure ADM-0015. The licensee identified the performer as a licensed operator.
- o For STP-256-0202, Revision 5, Purpose 1.1.1 incorrectly refers to TS 4.7.1.2.b vice TS 4.7.1.2.c.
- o TS 4.7.6.1.1e.2 was actually being satisfied by performance of STP-251-3502. However, the matrix listed STP-251-3604 which referenced STP-251-3502.

No violations or deviations were identified.

3. EXIT INTERVIEW

The inspector met with licensee representatives denoted in paragraph 1 on July 27, 1990, and summarized the scope and findings of this inspection. A followup telephone conference was held on July 31, 1990, between GSU and NRC representatives denoted in paragraph 2, for clarification of certain issues. The licensee did not identify as proprietary any of the materials provided to, or reviewed by, the inspector during this inspection.

ATTACHMENT

RIVER BEND PROCEDURES AND RECORDS REVIEWED

<u>Technical Specification</u>	<u>Description</u>	<u>STP Number</u>
4.1.2b	Verify reactivity equivalence of the difference between actual rod density and predicted rod density to be less than or equal to 1 percent delta K/K	050-3700, R3
4.2.2a	Determine FRTP and CMFLPD, calculate the value of T, and verify the most recent actual APRM flow biased simulated thermal power-high scram and flow biased neutron flux upscale control rod block trip setpoints are within specified limits, or adjusted	000-0001, R11
Table 4.3.2.1-1 Item 3.c	Calibrate secondary containment isolation actuation from fuel building ventilation exhaust radiation-high	511-4206, R5 511-4205, R5
Table 4.3.2.1-1, Item 6.f	Calibrate RHR system isolation actuation from drywell pressure-high	508-4201, R6 508-4202, R8 508-4203, R6 508-4204, R8 508-4591, R2 508-4592, R2 508-4593, R1
4.4.1.2.1	During two recirculation loop operation above 25 percent RTP, verify proper jet pump operation by measuring specified parameters at least once per 24 hours	053-3001, R3
4.4.3.1c	Calibrate drywell air coolers condensate flow rate monitoring system	207-4252, R5
4.4.7	Demonstrate each required MSIV operable by verifying full closure between 3 and 5 seconds	109-3302, R4
4.5.1c	For the LPCS, LPCI, and HPCS systems, perform a system functional test which includes simulated automatic actuation of the system throughout its emergency operating sequence and verifying that each automatic valve in the flow path actuates to its correct position	309-0601, R7 309-0602, R5

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| 4.5.3.3b | Demonstrate SPPS operatie by verifying that the flow path can be aligned to the suppression pool | 609-3301, R4 |
| 4.6.1.4c | Demonstrate each primary containment air lock operable by verifying that only one door in each air lock can be opened at a time | 057-0401, R4 |
| 4.7.1.2c | Demonstrate standby cooling tower and water storage basin operable by starting the cooling tower fans in each cell from the control room and operating each fan cell for at least 15 minutes | 256-0202, R5 |
| 4.7.6.1.1e | Demonstrate fire suppression water system operable by performing a system functional test which includes simulated automatic actuation of the system throughout its operating sequence | 251-3602, R6
251-3604, R4
251-3502, R4 |
| 4.7.6.2d | Demonstrate each required spray and sprinkler system operable by performing an air or water flow test through each open head spray and sprinkler header system and verifying that each open head spray nozzle and sprinkler header system is unobstructed | 251-3701, R3 |
| 4.8.1.1.1b | Demonstrate required independent circuits between the offsite transmission network and the onsite Class 1E distribution system operable by manually transferring unit power supply from the normal circuit to the alternate circuit | 302-0601, R2 |