



**GULF STATES UTILITIES COMPANY**

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

AREA CODE 504 625-8064 546-8851

September 10, 1990  
RBG- 33517  
File Nos. G9.5, G15.4.1

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

Gentlemen:

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

Pursuant to 10CFR2.201, this letter provides Gulf States Utilities Company's (GSU) response to the Notice of Violation related to NRC Inspection Report No. 50-458/89-200 which was transmitted to us in your letter of August 9, 1990. During the weeks of October 23-27 and November 13-17, 1989, the NRC conducted its Vendor Interface and Procurement Team Inspection of activities authorized by NRC Operating License NPF-47 for River Bend Station - Unit 1. GSU's response to the violations is provided in the enclosures.

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

Sincerely,

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

TFP/WHO/LAE/PDG/WCM/RGW/CRH/ns

cc: U.S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76011

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 )

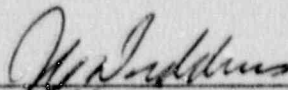
GULF STATES UTILITIES COMPANY )

Docket No. 50-458


(River Bend Station - Unit 1)

AFFIDAVIT

J. C. Deddens, being duly sworn, states that he is a Senior 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.

  
\_\_\_\_\_  
J. C. Deddens

Subscribed and sworn to before me, a Notary Public in and for the State and Parish above named, this 10<sup>th</sup> day of September, 1990. My Commission expires with Life.

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

**RESPONSE TO NOTICE OF VIOLATION 50-458/89200-03**  
**LEVEL IV**

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REFERENCE

Notice of Violation - Letter from S. J. Collins to J. C. Deddens, dated August 9, 1990.

FAILURE TO PERFORM A DOCUMENTED EVALUATION OF TECHNICAL INFORMATION RECEIVED FROM VENDORS

10CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," requires that measures be established to assure that conditions adverse to quality such as failures, defective material and equipment, and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action is taken to preclude repetition. The identification of the significant condition adverse to quality, the cause of the condition, and the corrective action taken shall be documented and reported to appropriate levels of management.

River Bend Engineering Department Procedure No. EDP-AA-65, "Review and Processing of Vendor Technical Information," implements the above requirements in the area of vendor information. This procedure states, in part, that "vendor information must be reviewed for applicability, completeness, consistency, and practicability prior to its incorporation in the design data base. The purpose of the review is to determine those vendor requirements or recommendations that are essential to maintain equipment quality and to provide technical justifications for amendments or exceptions to vendor requirements or recommendations that would adversely affect plant safety, personnel, ALARA considerations, or plant availability."

Contrary to the above, the licensee failed to perform a documented evaluation for applicability to RBS for technical information received from their emergency diesel generator (EDG) vendors Transamerica Delaval/Enterprise Engine (TDI/EE) and General Motors Electro-Motive Division/Morrison-Knudsen (GM/MK). Specifically, the inspectors found for the most part there were no documented evaluations for applicability to RBS for the Service Information Memos (SIMs) from TDI/EE pertaining to the Division I and II EDGs. Also, RBS had not received, evaluated, nor was aware of the existence of Power Pointers, and had not received or conducted any documented evaluations of maintenance instructions from GM/MK pertaining to the Division III EDG.

REASON FOR THE VIOLATION

GSU agrees that maintenance instructions and Power Pointers were not adequately maintained in the vendor technical information (VTI) system; however, all SIMs were evaluated in accordance with the procedural requirements in place at the time of receipt. A review of the existing SIMs in the VTI system was conducted to determine if all of these documents were processed in accordance with the procedures for reviewing VTI which were in effect when the documents were received. These procedures are River Bend Project Procedure (RBP) 3.3-4 and Engineering Assurance Procedure (EAP) 9.2. RBP 3.3-4 and EAP 9.2 were the

architect/engineer's (Stone & Webster Engineering Corp.) procedures for reviewing supplier technical information. The results of this review show that all of the SIMs were evaluated and entered into the VTI system in compliance with these procedures. These procedures for VTI review do not require that a statement of review be applied to the comments section of the review forms. The need to provide comments was left to the discretion of the reviewing engineer based on the type of review required and the results of the engineers review of the document. Also, the definitions for the type of review, i.e., 'Approved', 'Approved-As-Revised', and 'For Information', changed when GSU assumed design control of the plant. SIMs reviewed after GSU assumed design control were reviewed in accordance with GSU Engineering Procedure EDP-AA-65. Based on this information, reviews that were performed of all SIMs met the procedural requirements in place at the time of receipt.

The inspection team determined that GSU had failed to receive, evaluate and implement recommended corrective actions for the Division III emergency diesel generator from GM/MK. This situation arose because there were several different organizations involved in the processing of the vendor information associated with this diesel generator during construction and early operation of River Bend Station. General Motors Electromotive Division (GM-EMD) 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. Stone and Webster Engineering Corporation, the River Bend Station architect/engineer, received the Division III diesel engine vendor documentation from GE. In summary, at least three different companies were involved with the processing of paperwork associated with the Division III diesel generator before information was turned over to GSU.

#### CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

GSU has obtained the latest Maintenance Instruction Index for the Division III diesel engine and entered it into the VTI system. This index was reviewed and those documents which were not contained in GSU's document system were obtained from M/K Power Systems Division. GSU will review these documents for applicability to River Bend Station and enter them into the VTI system. Additionally, GSU has obtained the appropriate Power Pointers. These will be processed through the VTI system using EDP-AA-65.

#### CORRECTIVE STEPS WHICH WILL BE TAKEN TO PREVENT FURTHER VIOLATIONS

General Motors has named M/K Power Systems Division as the only authorized distributor of EMD parts and services to the nuclear industry. As a result, GSU corresponds directly with M/K Power System Division concerning the Division III diesel generator. M/K Power Systems has placed GSU on its mailing list for updated documents.

#### DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

GSU will have the missing Maintenance Instruction Index documents and appropriate Power Pointers processed through the VTI system by January 15, 1991.

**RESPONSE TO NOTICE OF VIOLATION 50-458/89200-04**  
**LEVEL IV**

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REFERENCE

Notice of Violation - Letter from S. J. Collins to J. C. Deddens, dated August 9, 1990.

FAILURE TO ASSURE THAT A TIMELY RESPONSE WAS PROVIDED

10CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures or drawings.

RBS Nuclear Licensing Procedure No. NLP-10-006, "Processing and Tracking of Regulatory and Industry Correspondence," requires Nuclear Licensing to take those actions necessary to assure that a timely response is provided to them when regulatory correspondence is classified as "For Response Required."

Contrary to the above, RBS Nuclear Licensing failed to take actions necessary to assure that a timely response was provided to them for 76 examples of regulatory correspondence classified "For Response Required." Forty-two of the 76 examples of regulatory correspondence were from the period 1984 through 1988.

DESCRIPTION OF CORRESPONDENCE PROCESSING

GSU requests that the violation, as written, be reconsidered by the NRC for the reasons discussed below. RBS procedure NLP-10-006, "Processing and Tracking of Regulatory and Industry Correspondence," Section 6.1, "Incoming Correspondence," step 6.1.3 states:

Nuclear Licensing, on receipt of the NRC or INPO correspondence takes actions as follows:

Reviews the correspondence and determines whether it is

- 1) "For Information Only"
- 2) "For Action Required"
- 3) "For Response Required"

"For Response Required" refers to correspondence which requires a formal written reply from GSU to the agency involved. In regard to NRC correspondence, this typically includes bulletins, generic letters, requests for additional information, and responses to inspection reports. Because Nuclear Licensing takes those actions necessary to assure a timely response for correspondence classified as "For Response Required", GSU is not aware of any failure to provide such responses to the NRC by the final due date. The 76 examples referred to in the notice of violation involve NRC information notices (INs). INs contain the following statement:

"This information notice requires no specific action or written response."

Therefore INs are routinely classified as "For Action Required" or "For Information Only" and not as "For Response Required." Action refers to "steps taken by GSU internally to act on a concern or recommendation/suggestion made by the NRC or INPO." Upon receipt of "For Action Required" correspondence, the department to which it is assigned advises Nuclear Licensing of its schedule for review pending other priority actions within that department. A "tickler" list is then used as a tool for tracking correspondence requiring an internal action by GSU.

The 76 INs referenced in the inspection report were received and distributed to the responsible departments for action. However, at the time of the inspection, no response had been received by Nuclear Licensing.

#### STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

At the time of the inspection there were 40 INs issued prior to 1989 that had not received complete evaluations. Nuclear Licensing has in the past requested and received revised review completion dates which were updated on the "tickler" list. GSU notes that all RBS departments except one had no responses outstanding to Licensing prior to November, 1989. GSU realizes that while this performance was within procedural requirements, it does not represent the level of performance desirable to GSU. Hence, resources have been used to reduce the backlog to acceptable parameters. GSU has actively pursued expediting the review of the 40 INs. The present program places emphasis on the oldest INs while simultaneously distributing current issues for review. The status of INs due to Licensing is now being provided to RBS management on a monthly basis and a list of specific INs due has been provided to the Engineering Department. This approach has been successful in decreasing the total responses due to Licensing for INs prior to 1990 to approximately 20, with only 6 of these INs being issued prior to 1989. GSU management has decided that transmittal/assignment of INs for internal action will be monitored in accordance with the existing procedure to prevent a future backlog.

#### SCHEDULE

GSU intends to complete its engineering review of all INs issued prior to 1989 by September 30, 1990.