



GULF STATES UTILITIES COMPANY

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AREA CODE 713 838-6631

August 9, 1982
RBG- 13,164
File No. G9.5, G15.4.1

Mr. John T. Collins, Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV, Office of Inspection and Enforcement
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Dear Mr. Collins:

River Bend Station-Unit 1
Refer To: RIV
Docket No. 50-458/Report 82-03

This letter is in response to the Notice of Violation and Notice of Deviation contained in I&E Inspection Report No. 50-458/82-03. The inspection was conducted at the River Bend Station construction site by Mr. A. B. Beach of your staff during the periods of late February, March, April, and early May, 1982, of activities authorized by NRC Construction Permit CPPR-145 for River Bend Station Unit No. 1.

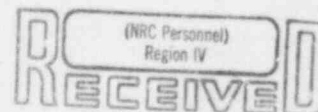
Gulf States Utilities Company's (GSU) response to the Notice of Violation and Notice of Deviation are provided in Attachments 1 and 2, respectively. We will be glad to discuss any further comments that you may have concerning our enclosed response.

Sincerely,

W. J. Cahill, Jr.
Senior Vice President
River Bend Nuclear Group

WJC/RJK/kt

Attachments



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ATTACHMENT 1
RESPONSE TO NOTICE OF VIOLATION

REFERENCE:

Notice of Violation - Madsen letter dated July 8, 1982
Refer To: Docket 50-458/82-03

- A. "Failure to Take Adequate and Prompt Corrective Action Regarding Reporting of Significant Construction Deficiencies."
- B. "Inadequate Procedural Requirements to Ensure Adequate Storage and Maintenance of Safety-Related Equipment."

A. RESPONSE

Gulf States Utilities (GSU) described changes in its reporting procedures in letters to Region IV dated March 18, 1982 (RBG-12,310) and May 5, 1982 (RBG-12,597). These letters were provided in response to concerns raised in Region IV letters to GSU dated February 4, February 8 and March 18, 1982 (Inspection Reports 81-11, 81-10, and 82-01, respectively). A meeting was held with members of the Region IV staff in GSU's corporate offices on May 18, 1982 to discuss GSU's responses and program for compliance with 10CFR50.55(e). The incident concerning Weld Process Procedure W-3 (GSU Deficiency Report (DR)-45) occurred prior to this meeting and was included in the discussion. The cause of GSU's seemingly late notification was a misunderstanding of the implementation of the new procedure. A GSU individual did not initiate the GSU deficiency review procedure upon notification by our architect engineer (A/E), Stone & Webster (S&W), of the concern because the suspected hardware deficiency had not been confirmed to exist. This person has been counseled to initiate GSU's review procedure immediately upon early notification by S&W, so that NRC notification and tracking processes can be initiated.

Regarding the specific comments in the Notice of Violation, Gulf States Utilities reviews the evaluation of the A/E prior to submitting written reports to the Regional Office. In the DR-45 instance, GSU did not agree with the conclusion of S&W's evaluation (i.e. the conclusions of the first reviewer) and directed that further evaluation take place. Construction Management Manual (CMM) Section 4.10 implements Quality Standard 16.2 specifically for the construction department and is the appropriate procedure to be used for construction's review.

The damage to the HPCS Batteries was discovered and documented in a Nonconformance and Disposition Report (N&D) in late December, 1981, prior to the effective date (February, 1982) of revised GSU procedures. In GSU's May 5, 1982 letter, GSU committed to a review

for reportability all currently open N&D reports to assure that no other potentially reportable items existed. This review was completed May 12, 1982 (C-RBS-02578).

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

GSU believes the actions taken prior to receipt of Inspection Report 82-03 and described or referenced herein address the concerns raised in the subject Notice of Violation. Continued emphasis on adherence to reporting procedures within GSU and S&W should ensure continued satisfactory reporting in accordance with Region IV desires and 10CFR50.55(e).

CORRECTIVE ACTION TAKEN TO AVOID FURTHER VIOLATIONS

See response above.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

GSU believes full compliance was achieved as of May 18, 1982, the date of the meeting between the Region IV Staff and GSU representatives held at the GSU Corporate Offices.

B. RESPONSE

Gulf States Utilities Company (GSU) has delegated required storage and maintenance for equipment and material received at River Bend Station to our Architect/Engineer-Constructor, Stone & Webster (S&W). Prior to the problems experienced, the administration and implementation of storage and maintenance (S/M) requirements were handled by S&W's Site Engineering Group (SEG). To put more emphasis on maintenance requirements, the responsibilities of the SEG have been reduced and those of the Construction Department increased.

At this time, the SEG reviews material receipt reports (MRR) against Specification 229.170, "Storage and Maintenance of Permanent Plant Equipment." MRRs are written for equipment and material received on site and serve as a warehouse record of receipt. Equipment Storage History Cards (ESHC) are prepared by the SEG and include any necessary maintenance requirements.

The S&W Construction Department implements the requirements of the ESHC. A mechanical and electrical construction coordinators assigned to the Construction Department are now a part of the Preventive Maintenance Program to assure that storage and maintenance requirements are implemented.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

Following the discovery of the damaged High Pressure Core Spray batteries (N&D 2010) in December 1981, S&W performed a complete review of all warehouse records to determine if any other equipment requiring maintenance had gone undetected.

A system has been established by the S&W SEG to insure that all equipment/material received is reviewed for maintenance requirements. Equipment maintenance requirements are then incorporated into the preventative maintenance program.

All MRRs received to date have been reviewed by the S&W SEG and maintenance requirements have been incorporated into the storage and maintenance specification for equipment where vendor preventative maintenance information was available. For equipment where vendor preventative maintenance information is not available, the equipment is identified and the necessary vendor information is sought. In all cases, the equipment is identified in the storage and maintenance specification (229.170) index and either specific or general storage and maintenance requirements are available. Equipment/material excluded from the S/M specification requires no periodic maintenance.

S&W has redefined the responsibilities of the Site Engineering Group. It now has the responsibility for reviewing all MRR's and initiating an ESHC if Storage and Maintenance requirements are necessary. S/M requirements both controlled storage and in place storage will be included on the ESHC. All instructions necessary to maintain and store the subject equipment are on or attached to the ESHC (i.e., no references to a specification or vendor manual). Any changes to the maintenance requirements will be made directly on the affected ESHC.

Site Engineering approved S/M on the ESHC will eliminate the present system (i.e. approve change via E&DCR, revise ESHC, and revise Specification). Preventive Maintenance Audits will be performed to assure maintenance.

To ensure that the S/M requirements listed on the ESHC are performed and in compliance with Specification 229.170, the S&W Field Quality Control (FQC) Group audits the activities of the Preventive Maintenance Group. The changes described herein should resolve the concerns raised regarding the adequacy of S&W's FQC inspections.

The new program emphasizes maintenance for all departments involved, and will receive primary consideration. ESHC change control is assured by the maintenance of a master ESHC log.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Specification No. 229.170 is being modified to provide program requirements and general S/M guidelines by equipment type only (i.e., pump, valve, motors, etc.). Specific storage requirements (i.e. manufacturers instructions) for equipment will be provided on or with the ESHC.

The specification will outline general program requirements and also reference applicable procedures and codes to define RBS S/M (i.e. ANSI N45.2.2, CMP 1.12, QS 13.1).

The specification will serve as a guide and overview for S/M emphasizing only the cornerstones of a sound program and not the details.

The ESHC will provide specific S/M requirements but will be consistent with similar types of equipment wherever possible (standardize maintenance).

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The changes identified above will be completed by December 31, 1982.

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ATTACHMENT 2

NOTICE OF DEVIATION

REFERENCE

Notice of Deviation - Madsen letter dated July 8, 1982
Refer To: Docket 50-458/82-03

"FSAR Requirements for Analysis and Design of Pipe Supports."

RESPONSE

GSU committed to comply with ASME, Subsection NF, 1974 edition including Summer 1974 addenda for pipe supports as stated in the River Bend Station (RBS) Final Safety Analysis Report Section 3.9.1.4.2A. The pipe supports have been designed to the requirements of NF-3132.3(a), which stipulates elastic analysis based on maximum stress theory in accordance with the rules of NF-3230 and Appendix XVII. The rules of NF-3230 permit the increase of the allowable stresses to values beyond the yield strength of the material for primary plus secondary stresses in Service Level B, and for primary stress in Service Level D. However, the increase in allowable stress in Service Level D is limited to the smaller of 1.2 Sy or 0.7 Su (Sy = yield stress, Su = ultimate stress). For ASTM A500 Grade B tube steel, 0.7 Su is equivalent to 0.97 Sy, which places this allowable stress to within the elastic limit.

For the Service Level B, Regulatory Guide 1.124 specifically limits the increase in allowable stress for the primary and secondary stress to the smaller of 2 Sy or Su, which ensures elastic shakedown. This means that the support will behave elastically after the initial small incurrence into the plastic region. Furthermore, Category I pipe supports are subjected to cyclic seismic or hydrodynamic vibratory loads that produce reversal tensile and compressive stresses of approximately equal magnitude. Appendix XVII-2110(b) limits the allowable stress increase of Service Level B to two thirds of the critical buckling stress. For pipe supports designed with A500 tube steel, this requirement places the design stress to within the elastic limit.

For the reasons stated above and as a result of our adherence to the FSAR and ASME Code commitments, the RBS pipe support design stresses for those supports utilizing A500 tube steel are within the elastic strength of the material. Therefore, the above explanation indicates that the FSAR analysis commitment has been met.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

See response above.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER DEVIATION FROM COMMITMENTS MADE TO THE COMMISSION

See response above.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

See response above.