

FEB 13 1991

Docket No. 50-458/90-29
License No. NPF-47

Gulf States Utilities
ATTN: James C. Daddens
Senior Vice President (RBNG)
P.O. Box 220
St. Francisville, Louisiana 70775

Gentlemen:

Thank you for your letter of January 28, 1991, in response to our letter and Notice of Violation dated December 27, 1990. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Original Signed By:
Samuel J. Collins

Samuel J. Collins, Director
Division of Reactor Projects

cc.
Gulf States Utilities
ATTN: J. E. Booker, Manager-
Nuclear Industry Relations
P.O. Box 2951
Beaumont, Texas 77704

Winston & Strawn
ATTN: Mark J. Wetterhahn, Esq.
1401 L Street, N.W.
Washington, D.C. 20005-3502

Gulf States Utilities
ATTN: Les England, Director
Nuclear Licensing
P.O. Box 220
St. Francisville, Louisiana 70775

RIV:C:DRP/PHHarrell:ter
2/13/91

S:DRP/SJCollins
2/2/91

111
IEO1

Gulf States Utilities

-2-

Mr. J. David McNeill, III
William G. Davis, Esq.
Department of Justice
Attorney General's Office
P.O. Box 94095
Baton Rouge, Louisiana 70804-9095

H. Anne Plettinger
3456 Villa Rose Drive
Baton Rouge, Louisiana 70806

President of West Feliciana
Police Jury
P.O. Box 1921
St. Francisville, Louisiana 70775

Cajun Electric Power Coop. Inc.
ATTN: Philip G. Harris
10719 Airline Highway
P.O. Box 15540
Baton Rouge, Louisiana 70895

Department of Environmental Quality
ATTN: Glenn Miller, Administrator
Radiation Protection Division
P.O. Box 14690
Baton Rouge, Louisiana 70898

bcc to DMB (IE01)

bcc distrib. by RIV:
R. D. Martin
DRP
Lisa Shea, RM/ALF
DRSS-RPEPS
Project Engineer (DRP/C)
DRS
Senior Resident Inspector, Fort Calhoun

Resident Inspector
Section Chief (DRP/C)
MIS System
RSTS Operator
RIV File
Senior Resident Inspector, Cooper

GULF STATES UTILITIES COMPANY

IVER BEND STATION POST OFFICE BOX 1051 ST. FRANCISVILLE, LOUISIANA 70775
AREA CODE 504 CLASS. 50M 547 5001



January 28, 1991
RBG- 34386
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. 50-458/90-29

Pursuant to 10CFR2.201, this letter provides Gulf States Utilities Company's (GSU) response to the Notice of Violations for NRC Inspection Report No. 50-458/90-29. The inspection was conducted October 17 to November 27, 1990, of activities authorized by NRC Operating License NPF-47 for River Bend Station - Unit 1 (RBS). GSU's reply to the violations are provided in the attachments. GSU is concerned with these events and is aggressively pursuing corrective actions.

Should you have any questions or care to discuss these matters, please contact Mr. L. A. Englund at (504) 381-4145.

Sincerely,

A handwritten signature in dark ink, appearing to read 'W. H. Odell'.

W. H. Odell
Manager-Oversight
River Bend Nuclear Group

LAE/PDG/FRC/DNL/EMC/GSY/JWC/pg

Attachments

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

Senior Resident Inspector
Post Office Box 1051
St. Francisville, LA 70775

91-323

9102650314

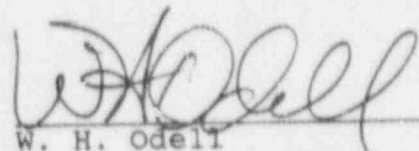
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

STATE OF LOUISIANA)
PARISH OF WEST FELICIANA)
IN the Matter of)
GULF STATES UTILITIES COMPANY)
(River Bend Station - Unit 1)


Docket No. 50-458

AFFIDAVIT

W. H. Odell, being duly sworn, states that he is a Manager-Oversight for 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.


W. H. Odell

Subscribed and sworn to before me, a Notary Public in and for the State and Parish above named, this 28th day of January, 1991. My Commission expires with Life.


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

ATTACHMENT 1

REPLY TO NOTICE OF VIOLATION 50-458/9029-02
LEVEL IV

REFERENCE

Notice of Violation - Letter from S. J. Collins to J. C. Deddens, dated December 27, 1990.

VIOLATION

Technical Specification 6.12.2 states, in part, that, "For accessible areas that are located within large areas, such as the containment. . . and within which radiation levels are such that a major portion of the body could receive in 1 hour a dose in excess of 1000 mrem, then that area shall be roped off and conspicuously posted, and a flashing light shall be activated as a warning device."

Contrary to the above, on November 14, 1990, a barrier was found to be down at the entrance to an accessible area on the 85-foot elevation of the drywell within which radiation levels were such that a major portion of the body could receive, in 1 hour, a dose in excess of 1000 mrem. This resulted in a failure by the licensee to maintain the area roped off and conspicuously posted.

REASON FOR THE VIOLATION

Personnel error was determined to be the cause in that the unknown individual who entered/exited the area failed to properly restore the rope boundary.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

The radiation protection technician (RPT) immediately restored the rope boundary upon notification. The RPT also verified that all individuals in the area were authorized and met Technical Specification requirements for entry. No discrepancies were found. RPTs verified that all high radiation postings in the drywell were properly restored and that all red flashing lights were operable.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

To address the concern of an apparent lack of regard to radiation barriers at RBS, GSU has performed the following:

- (1) On December 7, 1990, the Plant Manager issued a memo to all River Bend Station personnel highlighting high radiation problems.

of the respective fuel movement plans. One of these instructions stated that misrotated bundles were not considered fuel loading errors and that should any misrotated bundle be discovered it could be corrected at the discretion of the SRO and Reactor Engineer. This rule was not intended and was not utilized to allow misrotated bundles to remain uncorrected when discovered by refueling floor personnel. The potential for a mislocated bundle to affect shutdown margin (SDM) was recognized by GSU and was a major concern in the development of the fuel movement plans and rules. The movement plans were formulated and designed to minimize the potential for a mislocated bundle to affect SDM. Orientation of fuel bundles in a uniform lattice reactor such as River Bend has no impact on SDM during refueling. As a result, major emphasis is placed on shutdown margin and mislocation of bundles while discretion is allowed for correction of misrotated bundles when discovered. The misrotation discretion rule was not clear in its intent. A misrotated bundle was not clearly required to be documented and corrected prior to initiation of the independent core loading verification process. This omission could have allowed direct challenges to the independent reviewers.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

The misrotated bundles identified during the core verification were repositioned and verified correct by movement plan SMP-COR-4-04, as well as the final core verification utilizing underwater television camera/VCR equipment.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

REP-0010 will be revised to clarify and reduce any potential for direct challenges to the core loading verification independent review process. A fuel movement discrepancy form will be added such that any misrotated bundle discovered during fuel movement in the reactor core must be documented and corrected prior to beginning the independent core verification process. Training of refueling personnel will stress compliance with all fuel movement instructions and requirements of REP-0010. These corrective actions will be completed prior to the start of fuel movement in the reactor vessel during refueling outage No. 4.

Installation of a mast mounted camera to visually aid refuel floor personnel is being evaluated on a cost benefit basis along with other refueling equipment upgrades.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved upon completion of the core verification process prior to startup after refueling outage No. 3.

- c. Those high radiation areas whose boundaries can be slightly expanded to permanent structures will be reposted and locked.
- d. High radiation areas caused by hot spots in drains/pipin, nich can be hydrolazed will be deconned to reduce the high radiation levels.
- e. Signs resembling STOP signs indicating that Technical Specification monitoring is required will be posted at high radiation and very high radiation area entrances.
- f. Evaluate the use of temporary barricades and permanent structures to replace ropes.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved upon the immediate restoration of the rope boundary by the RPT. Further corrective actions will be completed as indicated above.

ATTACHMENT 2

REPLY TO NOTICE OF VIOLATION 50-458/9029-04
LEVEL IV

REFERENCE

Notice of Violation - Letter from S. J. Collins to J. C. Daddens, dated December 27, 1990.

VIOLATION

Technical Specification 6.8.1.c states, in part, that "Written procedures shall be established, implemented, and maintained covering refueling operations."

REP-0010, "Special Nuclear Material (SNM) Movement Control and Accounting," Revision 7, dated July 20, 1990, was implemented to provide instructions for reactor engineering activities during refueling operations. Attachment 8 of REP-0010 required that each fuel bundle that has been transferred be placed in the specified location and with the specified orientation.

Contrary to the above, licensee personnel failure to implement the requirements of REP-0010 in that five bundles (LYP408, LYV206, LYV283, LYV281, and LY9685), transferred to the specified location, were discovered by the licensee to be misoriented.

REASON FOR THE VIOLATION

Five fuel assemblies were misrotated as a direct result of refueling floor personnel error. The misrotation errors occurred during performance of fuel movement plans SMP-COR-4-02 and SMP-COR-4-03. These plans were developed as Attachment 8 of procedure REP-0010 and specify the order, location and orientation requirements for each fuel assembly moved. Two signatures are required to document performance completion of each step of these fuel movement plans. An independent review and verification of correct fuel loading is thoroughly performed by remote underwater TV camera equipment upon completion of core loading during the final core verification process as governed by REP-0010. VCR tapes of the core loading verification are obtained in accordance with the provisions of REP-0010.

Additional instructions included with the fuel movement plans provided guidelines and requirements for actions to be taken should any fuel movement errors be discovered by refueling personnel during implementation