



GULF STATES UTILITIES COMPANY

RIVER BEND STATION POST OFFICE BOX 230 ST. FRANCISVILLE, LOUISIANA 70775
AREA CODE 504 633-8094 346-9851

January 30, 1991
RBG-34408
File Nos. G9.5, G23.16.14

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

Gentlemen:

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

This letter provides Gulf States Utilities Company's (GSU) response to your letter dated January 9, 1991, with regard to implementation of alternate rod injection system (ARI) diversity requirements in accordance with 10 CFR 50.62 (ATWS rule) for Boiling Water Reactors (BWRs). This correspondence requested that each BWR confirm in writing whether their plant complies with the staff's position regarding diversity of the trip units between the ARI system and the reactor protection system (RPS). This information was requested based on Staff rejection of an appeal by the BWR Owners' Group (BWROG) on the requirements for diversity of trip units in these specific systems.

GSU has performed an evaluation of the information provided by the Staff in this matter and provides the following information.

Review of design documents at River Bend Station (RBS) confirm that analog trip units used for ARI are diverse from that used in the RPS. GSU utilizes Bailey Model 745 trip units in the ARI system and employs Rosemount trip units in the RPS actuation circuitry. This complies with the trip initiation device diversity as reflected by the Staff position in the aforementioned letter. It should also be noted that NRC evaluation of RBS compliance with 10CFR50.62 and subsequent inspection of RBS implementation of ATWS modifications have found RBS to be in compliance with this rule.

If you have any questions or require further information on this subject, please contact L.L. Dietrich at (504) 381-4866.

Sincerely,

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

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