Docket No. 50-458/90-33 License No. NPF-47

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

Gertlemen:

Thank you for your letter of January 25, 1991, in response to our letter and Notice of Violation dated December 26, 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.

Sincerely.

Original Signed By:
Samuel 1 Collins
Samuel 2. 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

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

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TO N

9102130086 910205 PDR ADDCK 05000458 Q PDR 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 Airiine 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 (IEO1)

bcc distrib. by RIV:

R. D. Martin

Resident Inspector

Section Chief (DRP/C)

Lisa Shea, RM/ALF

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Project Engineer (DRP/C)

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Senior Resident Inspector, Fort Calhoun

B. McNeill

I. Barnes

GULF STATES UTILITIES COMPA January 25, 1991 RBG-34381 FEB - 1 1991 File Nos. G9.5, G15.4. 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-,58/90-33 Pursuant to 10CFR2.201, this letter provides Gulf States Utilities Company's (GSU) response to the Notice of Violation for NRC Inspection Report No. 50-458/90-33. The inspection was conducted November 26-30, 1990, of activities authorized by NRC Operating License NPF-47 for River Bend Station - Unit 1 (RBS). GSU's reply to the violation is provided in the attachment. Should you have any questions, please contact Mr. L. A. England at (504) 381-4145. Sincerely, Odell Manager-Oversight River Bend Nuclear Group THE POSTERC DILLORD WC/pg Attachment 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, IA 70775 9102010020 410

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

STATE OF LOUISIANA)	
PARISH OF WEST PELICIANA)	
In the Matter of)	Docket No. 50-458
GULF STATES UTILITIES COMPANY)	
(River Bend Station - Unit 1)		

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 25^{++} day of 30^{-} . My Commission expires with Life.

Claudia P. Hurst

Notary Public in and for

West Feliciana Parish, Louisiana

ATTACHMENT

REPLY TO NOTICE OF VIOLATION 50-458/90-33

REFERENCE

Notice of Violation - Letter from S. J. Collins to J. C. Deddens, dated December 26, 1990.

VIOLATION

Criterion V of Appendix B to 10 CFR Part 50 and the licensee's approved quality assurance program description, require that activities affecting quality shall be accomplished in accordance with documented instructions.

Paragraph 4.6 of Procedure RBNP-008, "Document Control and Records Management," Revision 4, dated March 16, 1989, states in part, "Before performing any safety-related activity, document users are responsible for ensuring they are using the latest revision of a controlled document . . "

Contrary to the above, the following examples were noted, for work activities performed during the current refueling outage, where document users did not ensure they were using the latest revision of a controlled document:

- Sixteen Maintenance Work Orders (MWOs), R138328 through R138343, utilized torque data sheets from Procedure GMP-0018, Revision 5, and not the current Revision 7 for replacement of main steam safety relief valves.
- MWOs F125319, R125376, and R125379 utilized cleaning data sheets from Procedure GMP-0062, Revision 4, and not the current Revision 5 for refurbishment and replacement of ASME Section III Class 3 vent valve seat rings and plugs.

REASON FOR THE VIOLATION

The incorrect data sheets for GMP-0018 and GMP-0062 were utilized to complete the applicable MWOs. The root cause of this problem is two-fold. First, the maintenance planner inserted the wrong revision of the torque data sheets in MWOs R138328 thru R138343. The planner did insert the correct data sheets in MWOs R125319, R125376, and R125379 at the time the race planned. However by the time the MWO was worked, GMP-0062 had been revised. Consequently, the data sheets were not from the latest revision. Second, the Maintenance Foreman did not ensure that the data sheets were from the latest procedure revisions prior to performing work, as required by ADM-0028.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

A comparison of the procedure revisions was made to determine if the work completed using the old revision is satisfactory. From this comparison it was concluded that the work is satisfactory.

Procedure ADM-0028 "Maintenance Work Order" has been reviewed and has been determined to be adequate to require the latest revision of documents be included in MWO packages.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

To prevent recurrence of this problem, the following action will be taken. The maintenance foreman and planners will be retrained using Condition Report (CR) 90-1199 as required reading. CR 90-1199 was initiated when these discrepancies were recognized and documents the discrepancies and the corrective actions taken. A controlled copy of the Station Operating Manual index, which lists the latest revision for each procedure, will be provided in each shop area for ready reference by the foremen. Also, to clarify and emphasize that the latest revision of controlled documents be checked by the forman prior to the MWO being used in the field, the crew briefing sheet will be revised.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Corrective actions will be completed by March 31, 1991.