



GULF STATES UTILITIES COMPANY

RIVER BEND STATION POST OFFICE BOX 121 ST. FRANCISVILLE, LOUISIANA 70775
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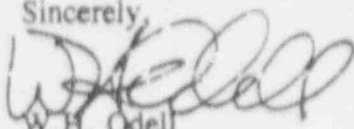
January 13 1992
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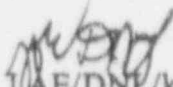
U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Gentlemen:

River Bend Station - Unit 1
Docket No. 50-458/91-21

In response to the Nuclear Regulatory Commission's letter from Mr. A.B. Beach to Mr. J.C. Deidens dated December 24, 1991 concerning the Notice of Violation (NOV) for NRC Inspection Report 50-458/91-21, Gulf States Utilities provides additional information as discussed in a conference call on December 16, 1991. The information in the attachment to this letter is intended to supplement information provided in our original response to the NOV dated November 15, 1991. Based on the original response and this supplemental information, GSU continues to request that the notice of violation be withdrawn.

Sincerely,

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


IAE/DNE/kvm

Attachment

cc: U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

NRC Resident Inspector
P.O. Box 1051
St. Francisville, LA 70775

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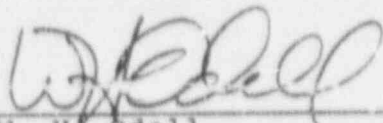
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

STATE OF LOUISIANA)
PARISH OF WEST FELICIANA)
In the Matter of)
GULF STATES UTILITIES COMPANY)
(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 13th day of January, 1972. My Commission expires with Life.



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

ATTACHMENT

Supplemental Information for Notice of Violation 50-458/91-21

Reference

- Notice of Violation - Letter from A. Bill Beach to James C. Deddens dated October 16, 1991
- Response to NOV - Letter from J.C. Deddens to the U.S. NRC dated November 15, 1991
- Request for Information - Letter from A. Bill Beach to James C. Deddens dated December 24, 1991

Supplemental Information

GSU's initial response to the Notice of Violation (NOV) describes the events that occurred on and following August 23, 1991, concerning maintenance performed on the standby gas treatment system and fuel building ventilation filter train heater control circuit. The response included a description of the operability evaluation that was performed on the fuel building ventilation system which resulted in a determination that the ventilation system was operable with the heater in the filter train being out of service. This operability evaluation was performed and documented prior to work on the heater. A control switch was removed from the circuit during maintenance and was returned to its original configuration under the procedural control of maintenance procedures ADM-0028 "Maintenance Work Order" and GMP-0042 "Circuit Testing Lifted Leads, and Jumpers." At no time while the control switch was removed was the heater required to be operable. The heater was deemed inoperable and was not operated during this time. GSU did not modify (cf. ENG-3-006) the heater control circuit during the maintenance activity. The replacement switch possessed the same fit, form and function.

During the conference call on December 16, 1991, the NRC representatives pointed out that the USAR describes the filtration unit including the filter heater and questioned the basis for defeating the heater function without an approved modification request and 10CFR50.59 evaluation. The fuel building ventilation system is described in USAR Section 9.4.2. This section gives the design bases, system description, safety evaluation, inspection and testing requirements, and instrumentation requirements. Section 9.4.2.2.4, charcoal filtration system, states that "Electric heating coils in the filter unit raise the temperature of air to limit the relative humidity to a maximum of 70 percent."

One purpose of the USAR is to give a description of the plant, including most systems and components. When a component or system is taken out of service for maintenance the plant no longer completely meets the USAR as the component or system cannot perform its function. In general, the Technical Specifications give the requirements for system operability including allowable outage times. When maintenance has an effect on the safety function of a Technical Specification required system, an action statement must be entered. However, when a

maintenance activity does not impact the safety function of a system or a required support function, the maintenance can be performed without declaring the technical specification system inoperable. NRC Inspection Manual Part 9900: Technical Guidance on Operability gives an example concerning heat tracing used for freeze protection of a safety related system. The freeze protection support function may be described in the USAR and may be needed for operability when freezing temperatures exist; however, when not required it may be removed from service for maintenance without impact on system operability. Even though support functions may be described in the USAR, they may not always be required to fulfill the safety function of the system. This is the case with the fuel building ventilation system charcoal filter heater. The support function of the heater was determined to not be required during normal operation with no fuel movement; that is, the ventilation system could perform its safety function without the heater in service. When the switch was removed from the heater control circuit there was no intent to change the design. The circuit was returned to its original configuration as part of the maintenance activity. If, for example, the switch had failed, it is clear that it could have been removed and replaced with a spare part as a maintenance activity. In this example, operability of the system would not be effected, i.e. the system would remain operable throughout the maintenance as the system safety function would not be effected. The maintenance that was performed in August, 1991, was essentially the same as the replacement of a failed switch with a spare part.

In summary, the USAR describes plant systems and components. These systems and components are required to function when needed to meet the requirements of the Technical Specifications and the safety analysis. A component can be removed from service for maintenance if the component is not required to support a safety function. If the component is returned to service in its original configuration, no modification request or 10CFR50.59 is required. GSU believes that the maintenance performed in August, 1991 on the fuel building filtration heater control circuit was properly controlled as a maintenance activity and that no modification request was required. The heater switch was removed from the circuit and replaced with a spare without any impact on the safety function of the system as described in the USAR. GSU has reviewed this position with the guidance given in NRC Inspection Manual Part 9900: Technical Guidance on Operability (specifically Section 6.12, Support System Operability) and has found them to be consistent.