APPENDIX

U.S. NUCLEAR REGULATORY COMMISSION REGION IV

NRC Inspection Report: 50-458/92-02

Operating License No. NPF-47

Docket: 50-458

Licensee: Gulf States Utilities (GSU)

P.O. Box 220

St. Francisville, Louisiana 70775

Facility Name: River Bend Station (RBS)

Inspection At: RBS, St. Francisville, Louisiana

Inspection Conducted: January 6-10, 1992

Inspector: R. C. Stewart, Reactor Inspector, Materials and Quality

Programs Section, Division of Reactor Safety

Approved: J. Barnes, Chief, Materials and Quality

Programs Section, Division of Reactor Safety

1/31/92 Date

Inspection Summary

Inspection Conducted January 6-10, 1992 (Report 50-458/92-02)

Areas Inspected: Routine, unannounced inspection of the document control program and actions on previously identified inspection findings.

Results: The licensee's procedures and administrative controls for implementation of the document control program were found to be adequately defined and satisfactorily implemented. A non-cited violation was identified (paragraph 3.3) pertaining to the failure of a document control satellite station to either void or remove obsolete drawings.

DETAILS

1. PERSONS CONTACTED

- *J. McQuirter, Engineer, Nuclear Licensing *C. Miller, Supervisor, Maintenance Support *K. Kennedy, Supervisor, Records Management
- *H. Turner, Section Head, Station Document Control

*D. Thomas, Director, Administrative Services

*T. Crouse, Manager, Administration

*D. Lorfing, Supervisor, Nuclear Licensing *G. Kimmell, Director, Quality Assurance (QA) *J. Booker, Manager, Nuclear Industry Relations

*M. Sankovich, Manager, Engineering

- *K. Suhrke, General Manager, Engineering and Administration
- *J. Spivey, Jr., Senior QA Engineer *J. Deddens, Senior Vice President

*W. Odell, Manager, Oversight

- *L. England, Director, Nuclear Licensing
- *S. Woody, Director, Nuclear Station Security

*P. Graham, Plant Manager

J. Maher, Engineer, Nuclear Licensing

*Denotes attendance at the exit meeting on January 10, 1992.

Other members of the technical and administrative staff were also contacted during the inspection.

2. LICENSEE ACTION ON PREVIOUS INSPECTION FINDINGS (92701, 92702)

2.1 (Closed) Inspector Followup Item (458/9119-01): The specified preventive maintenance inspection frequency for examining auxiliary building unit coolers was inconsistent between procedures.

During this inspection, the inspector reviewed the preventive maintenance procedures pertaining to the inspections and sampling for biofouling of the auxiliary building unit coolers (ADM-0053, Revision 3 and PMP-8047, Revision 5). The inspector noted that Procedure ADM-0053, "Asiatic Clam Control Program," Revision 3 established the frequencies for inspection and sampling of the unit coolers. The prior reference to inspection frequencies contained in Procedure PMP-8047, "Preventive Maintenance Inspections and Sampling for Biofouling," was deleted in Revision 5 dated November 1, 1991, thereby eliminating the previously observed inconsistencies. This item is considered closed.

2.2 (Closed) Violation (458/8927-01): The Facility Review Committee (FRC) and the Nuclear Review Board (NRB) had not reviewed the Quality Class II facility modification requests (MRs).

In response to this violation (letter dated August 11, 1989) the licensee indicated that the root cause for the violation was a prior history of inadequate review of field change notices to the original MRs and unreviewed safety question determinations (USQDs). The FRC had only reviewed those modifications that were classified as safety-related. Corrective actions completed by the licensee included verification that the computerized data base of reviewed documents was up-to-date. This included entry of all documents reviewed and listed in the unreviewed safety question committee (NRB/USQC) meeting minutes prior to June 1988. All USQDs for MRs that had not received a USQC review were reviewed in accordance with Technical Specification (TS) 6.5.3.7. No discrepancies were identified.

In addition, the inspector verified that Procedure ADM-0002, "Charter of the facility Review Committee," Revision 11A, dated January 2, 1991, included the requirement for the FRC to review all proposed changes or modifications which result in an USQD performed in accordance with 10 CFR 50.59. This item is considered closed.

2.3 (Closed) Unresolved Item (458/9023-01): 10 CFR Part 21 evaluation for reportability of the Division 1 emergency diesel generator (EDG) cracked turbocharger support bracket plate.

The licensee classified the cracked plate as a valid failure in accordance with Regulatory Guide 1.108, Position C.2.e.8, and reported the condition and corrective action in a special report to NRR dated September 27, 1990, pursuant to TS 4.8.1.1.3 and 6.9.2. The corrective action taken was the installation of new support plates of increased cross section on both engines, which increased the strength and structural rigidity.

The licensee ascertained that the design review performed by the Transamerica Delaval, Inc. (TDI), owners group in 1984 and 1985 of the TDI EDGs included validation of the turbocharger support adequacy. The design calculations, Memorandum SCRB-6561 in the owners group report, demonstrated that the turbocharger was adequately supported by the existing brackets, Parts 03-0475A and -C. These brackets are independent of the cracked support plate that this unresolved item pertains to. The inspector was additionally informed by the licensee's cognizant engineer that specific design information was not provided to RBS relative to the added support plate. The licensee concluded from review of the owners group calculations that the cracked support plate did not constitute an unanalyzed condition or a defect as defined by 10 CFR Part 21, and was thus not reportable. The inspector reviewed the licensee information and concurred with the determination. This unresolved item is considered closed.

2.4 (Closed) Inspector Followup Item (458/9034-01): Review of GSU evaluation pertaining to the TS maximum reactor heatup rate of 100°F/Hour being exceeded during startup from Refueling 3. Other specifics included in this open item were to be reviewed during a future inspection (see paragraph 2.5, NRC Inspection Report 50-458/91-16, dated July 5, 1991).

During this inspection, the inspector conducted a followup review of this incident and verified that the following additional corrective actions were taken:

- The licensed operator who was the At-the-Controls Operator during this event was removed from 'icensed duties.
- Surveillance Test Procedure STP-050-0700, "RCS Pressure/Temperature Limits Verification," was revised to require monitoring every 15 minutes with immediate reviews by the Control Room Foreman and the At-The-Controls Operator. Heatup/cooldown rates were also administratively limited to 80°F/Hour Startup Procedure by G08-0001, Revision 10G.
- Operating crews were briefed by the Plant Manager and operations management on this event when they assumed their next shift.
- Operations Department Policy 003 issued February 14, 1991, is now a standard for shift operations communications and will be continuously monitored by operations management.
- A graphic display of the heatup/cooldown rate was added to the process computer display monitor in the control room. This display was demonstrated to the inspector by a reactor operator during this inspection.
- Training on this event was scheduled for all shift technical advisers (STAs), as well as all operators. STAs received training via Lesson Plan 912-4 completed on February 15, 1991. Training for all operators was given in Requalification 520 completed on March 26, 1991.

This item is considered closed.

DOCUMENT CONTROL PROGRAM (39702)

The objective of this inspection was to ascertain whether the licensee had implemented a document control program that was in conformance with regulatory requirements, TSs, the Updated Safety Analysis Report, and applicable industry guides and standards.

3.1 Organization

The licensee's organization for the document control program was structured under the General Manager, Engineering and Administration, with the site supervisor of document control and records reporting directly to the Director, Administrative Services. The responsibilities and requirements established for the internal operation of station document control (SDC) were contained in Procedure SSP-1-004, "Station Document Control System."

3.2 Document Control Program

The inspector ascertained that the established measures for control of receiving, recording, maintenance, and control of documents that affect safety-related activities, including subsequent changes and revisions to those documents, were contained in approved support procedures, administrative procedures, and the quality assurance manual. The inspector reviewed the procedures, which are listed in the Attachment to this report, and determined that: (a) Administrative Procedure ADM-0005, "Station Document Control," suitably defined responsibilities; and (b) the licensee had established a document control program that was consistent with regulatory requirements and licensee commitments.

The inspector was provided a walkthrough of the various functional areas of the SDC by the Supervisor, Records Management and the Section Head, SDC. During the walkthrough, the inspector met with the cognizant supervisors and other personnel in order to verify that their responsibilities and implementing activities were in agreement with program requirements.

3 3 Implementation Verification

The inspector ascertained that the licensee had established a computerized records management system, which utilized records imaging on 16 mm microfilm, optical disk, or 35 mm aperture cards. In each case, retrieval of the records was performed through use of the computerized indexing data base. Utilizing the indexing data, the inspector randomly selected the most current revisions issued by SDC involving 20 documents composed of drawings, system operating procedures, maintenance procedures, etc.

In order to verify that SDC and satellite stations were consistent with the master indexes, the inspector conducted the above verification utilizing the standard distribution lists which identified selected documents issued to the specific satellite custodians.

During the inspector's examination of documents controlled by the instrument and controls (I&C) custodian (Satellite Station 5), the inspector observed that five volumes of control loop diagram drawings were being maintained as "controlled copies" within the designated area for controlled documents. However, current applicable diagram revisions in the inspector's sample (i.e., 1-W7H-PCV Sheet 1, Revision 4; and 1-SWP-191, Sheet 1, Revision 2) were found to have not been inserted in the volumes, nor was I&C identified in the distribution matrix for the specific revisions. A subsequent review of the distribution status "tickler" file, conducted by the SDC supervisor, revealed that a memorandum to SDC from the I&C custodian dated November 6, 1989, requested that the I&C satellite be removed from the distribution matrix for subsequent control loop diagram revisions. Procedure ADM-0005, Revision 8, "Station Document Control," paragraph 6.6, required that satellite station custodians review those documents within their assigned station against the provided indexes, quarterly (once per year, as a minimum) to assure that all voided or superseded documents checked have been removed or marked void.

The failure of the I&C custodian to comply with the procedural requirement of ADM-0005 is an apparent violation of 10 CFR 50, Appendix B, Criterion V.

Discussions held by the inspector with the cognizant I&C and SDC personnel revealed that the obsolete drawings did not have the potential for the authoritative use of the drawings within the framework of RBS program procedures used in plant designs or modifications. Furthermore, other than the fact that the five volumes had not been removed (or stamped as void), I&C could not determine a specific use or need for the drawings.

The licensee initiated immediate corrective action by removing and destroying the five volumes. In addition, the SDC supervisor issued a memorandum dated January 10, 1992, to station supervisors and SDC personnel, requiring written verification that documents being deleted were stamped, destroyed, or returned to SDC. It was further determined that this finding was an apparent isolated incident. The violation is not being cited because it meets the criteria specified in Section V.A. of the enforcement policy.

4. EXIT INTERVIEW

An exit interview was conducted on January 10, 1992, with those personnel denoted in paragraph 1 in which the inspection findings were summarized. No information was presented to the inspector that was identified by the licensee as proprietary.

ATTACHMENT

DOCUMENTS REVIEWED DURING DOCUMENT CONTROL INSPECTION

Procedures

- SSP-1-004, "Station Document Control System," Revision 6
- ADM-0005, "Station Document Control," Revision 8
- Operations Quality Assurance Manual, QAD-6, "Document Control," Revision 8
- RBNP-008, "Document Control and Records Management," Revision 5
- Station Support Manual, Administrative Support
- SSP-1-003, "Records Management/Permanent Plant Files," Revision 6

Memoranda

- To Supervisor-Document Control from Ed Glass, dated November 6, 1989
- To Station Supervisors from K. F. Kennedy, dated January 10, 1992
- To SDC Personnel from K. F. Kennedy, dated January 10, 1992