



**GULF STATES UTILITIES COMPANY**

RIVER BEND STATION      POST OFFICE BOX 220      ST FRANCISVILLE, LOUISIANA 70775

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August 7, 1992  
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U.S. Nuclear Regulatory Commission  
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Washington, D.C. 20555

Gentlemen:

River Bend Station - Unit 1  
Docket No. 50-458/92-18

Pursuant to 10CFR2.201, this letter provides Gulf States Utilities Company's (GSU) reply to the Notice of Violation for NRC Inspection Report No. 50-458/92-18. The inspection was conducted by Messrs. E. J. Ford and D. P. Loveless on April 12 through May 23, 1992, of activities authorized by NRC Operating License NPF-47 for River Bend Station - Unit 1 (RBS). GSU's reply to the violation is provided this date per a July 31, 1992 conversation with Mr. P.H. Harrell of NRC Region IV.

Should you have any questions, please contact Mr. L. A. Englar at (504) 381-4145.

Sincerely,

W. H. Odell  
Manager - Oversight  
River Bend Nuclear

Group

*WAE* *PDG* *SRC* *JWC* *pj*  
WAE/PDG/SRC/JWC/pj

Enclosure

cc: U.S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 77011

NRC Resident Inspector  
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St. Francisville, LA 70775

9208110215 920807  
PDR ADCK 05000458  
G PDR

*Handwritten initials/signature*

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

STATE OF LOUISIANA )

PARISH OF WEST FELICIANA )

In the Matter of )

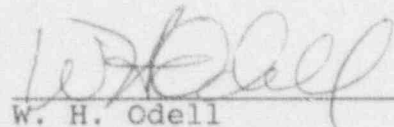
GULF STATES UTILITIES COMPANY )

(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 7<sup>th</sup> day of August, 1992. My Commission expires with Life.

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

## ATTACHMENT

### REPLY TO NOTICE OF VIOLATION 50-458/9218-01 LEVEL IV

#### REFERENCE

Notice of Violation - Letter from A. B. Beach to J. C. Deddens, dated June 30, 1992.  
Licensee Event Report No. 92-008 - submitted to NRC on May 4, 1992.

#### VIOLATION

During an NRC inspection conducted on April 12 through May 23, 1992, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

Technical Specification 3.6.1.2 states, in part, that primary containment integrity-fuel handling shall be maintained when handling irradiated fuel in the primary containment and during core alterations. Primary containment integrity-fuel handling is defined to exist when all containment penetrations required to be closed during accident conditions are closed by at least one manual valve, blind flange, or deactivated automatic valve secured in its closed position.

Contrary to the above, on April 2, 1992, primary containment integrity-fuel handling was not maintained while handling irradiated fuel in that Containment Penetration KJB\*Z53B was not closed because the penetration piping had been cut, inside the containment, and the outboard containment isolation valve was in the open position.

#### REASON FOR THE VIOLATION

On March 31, 1992, with RBS in a refueling outage (RF-4), Division II standby service water piping was cut between the inboard isolation valve (ISWP\*MOV5B) and the containment penetration to install a removable spool piece in support of chemically cleaning the service water piping. The outboard isolation valve (ISWP\*MOV81B) was in the open position, the system piping outside containment was being modified, had been drained, and had openings, which established a leakage path for containment atmosphere from primary into secondary containment. Commencing on April 1, core alterations were performed for approximately 11 hours in primary containment. GSU acknowledges that core alterations without the establishment of primary containment integrity is a violation of Technical Specification 3.6.1.2 as reported in LER 92-008.

The root cause of this incident is personnel error by both the releasing senior reactor operator (SRO) and the tagging official (TO). The releasing SRO did not adequately question the personnel performing the piping modification under maintenance work order (MWO) #141544 as to the details of the work. The releasing SRO then failed to list the MWO on the tracking limiting condition for operation (LCO) for Containment Integrity-Fuel Handling. Had this communication been complete, the MWO would have been listed on the LCO and operators would have been aware of this containment breach when attempting to establish containment

integrity for commencement of fuel offloading operations. The TO also did not adequately question the workers requesting that the outboard isolation valve be opened and left open to verify the pipe was drained. The TO misunderstood that the location of the cutting of the pipe was to be in the auxiliary building rather than inside containment. Had the TO understood the location of the breach, he would have reclosed the isolation valve after the pipe was verified drained.

A number of contributing factors were involved. Operations personnel believed that a more extensive review of work packages was performed by Outage Management than was the case. Operations personnel also placed reliance on a service water modification status board in the control room, but the status board was not at that time providing a continuing, up-to-date status of the system as the modifications were being installed.

The potential for a containment integrity conflict was not identified during the development and planning stages of modification request (MR) 90-0008 and MWO #141544. Engineering procedure ENG-3-006, "Modification Request" now includes a post design review checklist which specifically addresses the operational impact of modifications. This procedural requirement was not in place when MR 90-0008 was approved for work in January 1990. Nor did the MWO planning process flag the potential for containment integrity impact. The planning process identified containment isolation valves for added precautions. However, the MWO in this case, was associated with a service water line number rather than an isolation valve.

#### **CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED**

Upon discovery of the containment breach on April 2, 1992, immediate corrective actions included closing and tagging outboard isolation valve 1SWP\*MOV81B, thereby reestablishing containment integrity and suspension of additional core alterations and handling of irradiated fuel in primary containment. Notification under 10CFR50.72 of a condition that alone could have prevented the fulfillment of a safety function was called in to the NRC. A review of all active work packages to determine if any could possibly affect containment integrity, operator walkdowns of piping and valves necessary to maintain containment integrity-fuel handling, placement of danger tags on all primary containment service water penetrations, and satisfactory recompletion of STP-000-0702, "Primary Containment Integrity - Fuel Handling Verification", were performed. Reactor core offloading was resumed.

This incident was reviewed with all operators during shift briefings to emphasize the consequences of this error. Also, specific guidance was given to shift supervisors and control operating foreman via memorandum on post-design documentation requirements prior to work release of MR-related MWOs. STP-000-0702 was revised to add requirements for the SSs/COFs to review the tracking LCOs and LCOs for containment integrity impacts.

Engineering initiated a review program to provide post-modification design reviews for MRs and PMRs which have not received them. Until service water modifications and cleaning are completed in RF-4, a service water engineer will review all MRs, MWOs and PMRs dealing with service water with the releasing SRO and control room status boards and P&ID drawings will be updated prior to his release.

#### CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER FINDINGS

Further training shall be given to all licensed operators on procedures ENG-3-006, ADM-0028, "Maintenance Work Order," and the applicable Technical Specifications associated with this finding. This training will be given during Licensed Operator Requal Training. CR92-0201 and LER 92-008 will be included as required reading for all licensed operators.

Since post-design reviews may be performed months or years in advance of actual installation, a final design review just prior to starting work to factor in schedule changes, LCOs, or abnormal plant configurations will be evaluated.

A methodology to be used during outages will be developed to provide a uniform review of work packages. All SSs, COFs, TOs, and outage management personnel will be trained on this methodology. The maintenance planning process will be revised to aid the maintenance planner in identifying any MWO that may impact containment integrity.

#### DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

All corrective actions will be completed by June 30, 1993.