

APPENDIX B

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-458/84-29

Permit: CPPR-145

Docket: 50-458

Licensee: Gulf States Utilities
P.O. Box 2951
Beaumont, TX 77704

Facility Name: River Bend Station

Inspection At: River Bend Station, St. Francisville, LA

Inspection Conducted: October 9-12 and 22-26, 1984

Inspector: *W R Bennett* 11/21/84
W. R. Bennett, Reactor Inspector, Project
Section A, RPBI Date

J P Jaudon 11/23/84
J. P. Jaudon, Chief
Project Section A, RPBI Date

Inspection Summary

Inspection Conducted October 9-12 and 22-26, 1984 (Report 50-458/84-29)

Areas Inspected: Routine, unannounced inspection of plant procedures, preoperational test procedures, and comparison of as-built plant to FSAR description. The inspection involved 54 inspector-hours onsite by one NRC inspector.

Results: Within the three areas inspected, one violation was identified (failure to follow procedure concerning updating of procedure "LATERS").

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DETAILS

1. Persons Contacted

Principal Licensee Contacts

- *W. J. Cahill, Senior Vice President
- *T. F. Plunkett, Plant Manager
- *P. D. Graham, Asst. Plant Manager - Technical Services
- *P. E. Freehill, Supt. Startup & Test, Asst. Plant Manager - Operations
- *T. L. Crouse, QA Manager
- *L. P. Handy, QA Engineer
- *W. K. Anders, Senior QA Engineer
- *T. O. Gray, Director, Quality Operation
- *D. G. Seymour, Compliance Specialist
- *I. M. Malik, Senior QA Engineer
- *P. J. Dautel, Licensing Staff Assistant
- *S. R. Radebaugh, Asst. Supt., Startup & Test
- *R. B. Stafford, Director, Quality Services
- *P. F. Tomlinson, Supervisor, Operations QA
- *J. Godleski, QA Engineer
- T. Fredieu, Asst. Operations Supervisor
- K. Bennefield, Operations Procedure Writer

Other Contractor Contacts

- *R. L. Spence, Stone & Webster (S&W), Resident QC Manager
- *B. R. Hall, Stone & Webster (S&W), Asst. Supt. Field QC
- *F. W. Finger, Stone & Webster (S&W), Project Manager, Preliminary Test Organization
- *D. P. Barry, Stone & Webster (S&W), Superintendent of Engineering
- *W. L. Sutor, GE Startup & Test, Test Engineer
- *J. B. Warner, Nuclear Energy Services (NES), Project Manager
- *H. E. Walsh, Sunbelt, Procedure Coordinator

The NRC inspector also contacted other site personnel including administrative, clerical, document control and operations personnel.

*Denotes those present at exit interview.

2. Plant Procedures

The objective of this inspection was to confirm that the scope of the plant procedures system is adequate to control safety-related operations within applicable regulatory requirements. The inspection objective was also to determine the adequacy of management controls in implementing and maintaining a viable procedure system.

The NRC inspector reviewed the following procedures:

<u>NUMBER</u>	<u>REVISION</u>	<u>SUBJECT</u>	<u>ISSUE DATE</u>
ADM-0003	2	Development, Control, and Use of Procedures	5/29/84
ADM-0022	0	Conduct of Operations	3/29/84
OSP-0007	0	Preparation of Operations Section Procedures	4/30/84

The NRC inspector's review of these procedures determined that controls had been properly established for the preparation, review, approval, and periodic updating of procedures. This review and subsequent interviews with licensee personnel also determined that controls had been properly established for issue, distribution, review, and updating of standing orders and that the proper types of instructions had been issued utilizing these orders.

The NRC inspector reviewed the following procedures and their supporting/approving packages.

<u>Numbers</u>	<u>Revision</u>	<u>Subject</u>	<u>Issue Date</u>
COP-0004	0	Sampling the Standby Gas Treatment System	8/24/84
GMP-0016	0	Manway/Handway Removal and Installation	8/31/84
STP-000-0001	0	Daily Operating Logs	8/24/84
SOP-0001	0	Nuclear Boiler Instrumentation	8/02/84
MCP-4020	0	Calibration of the Barton Model 227 Differential Pressure Indicator	10/01/84
OSP-0007	0	Preparation of Operating Section Procedures	4/30/84
OSP-0003	0	Logs and Records	7/13/84
ARP-0034	0	P601-17A Alarm Response	9/19/84
AUP-0001	0	Reactor Scram	10/18/84
AUP-0017	0	Pressure Regulator Failure Increasing and Decreasing	9/19/84

The NRC inspector determined by this review and by interviews with licensee personnel that procedures were being prepared, reviewed, and approved in accordance with licensee procedures ADM-0003 and OSP-0007.

Licensee procedure ADM 003 requires that all procedures that have information to be added or corrected at a later date shall have a "LATERS" page specifying that information. These procedures are required by ADM 003 to be updated as the information becomes available. The NRC inspector determined through interviews with licensee and NES personnel, that NES was not updating these procedures as the information became available.

This is an apparent violation. (8429-01)

3. Preoperational Test Procedures

The objective of this inspection was to ensure that test results are being adequately evaluated.

The NRC inspector reviewed completed preoperational test 1-PT-205-1, "Low Pressure Core Spray Preoperational Test." This test was completed satisfactorily with the exception of test exceptions 2 and 8, which were properly documented on the system punch list. The test appeared to have been conducted properly using correct operating procedures. All changes were correctly administered and entered in the procedure. All data was entered and was within the range of the acceptance criteria.

No violations or deviations were identified in this area of the inspection.

4. Comparison of As-Built Plant to FSAR Description

The objective of this inspection was to determine on a sampling basis if the as-built plant conformed to commitments contained in the FSAR, and by direct observation, to determine if the physical installation was in agreement with piping and instrument drawings contained in the FSAR.

Utilizing the system flow diagram 12210-FSK-27-5, the NRC inspector walked down the Low Pressure Core Spray System. One valve (V-35) that was shown on the flow diagram was discovered not to be installed in the system. This discrepancy was not annotated on the system punch list. Further investigation revealed that the valve had been previously deleted from the Low Pressure Core Spray System preoperational test 1-PT-205-1 and that the valve was deleted from control diagram 1-CSL-043-1 by Conditional Construction Revision Notice (CCRN) #11 on February 14, 1984. Plant procedures require that Flow diagrams be updated only upon a revision to the control diagram. The last revision to the control diagram was approved on February 2, 1984 (prior to issuance of CCRN #1). Although the extraordinary length of time between control diagram revisions and consequent updating of flow diagrams met procedural requirements, it could be construed as a failure to meet the intent of 10 CFR Part 50, Appendix B, Criterion V; therefore, it is considered to an unresolved item pending licensee review and further NRC inspection (8429-02).

The NRC inspector compared the results of his system walkdown with the FSAR description and found no other discrepancies.

No violations or deviations were identified in this area of the inspection.

5. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, violations, or deviations. The following unresolved item was found during this inspection:

<u>Paragraph</u>	<u>Item No.</u>	<u>Subject</u>
4	8429-02	Timely update of flow diagrams

6. Exit Interviews

Exit interviews were held on October 12, 1984 and October 26, 1984, with the personnel denoted in paragraph 1 of this report. The NRC senior resident inspector for operations also attended these meetings. At these meetings the scope of the inspection and the findings were summarized.