



GULF STATES UTILITIES COMPANY

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March 20, 1985
RBG- 20467
File Nos. G9.5, G9.33.4

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Denton:

River Bend Station - Unit 1
Docket No. 50-458
Generic Letter 83-28

In a letter dated August 3, 1984 (GSU/Booker to NRC/Eisenhut, RBG-18521) Gulf States Utilities Company (GSU) submitted a final response to Sections 1.1, 2.1, 2.2 and 4.5 of Generic Letter 83-28 "Required Actions Based on Generic Implications of Salem ATWS Events" and committed to provide a response to Section 3.1 and 3.2 prior to fuel load.

Attached please find forty (40) copies of GSU's final response to Sections 3.1 and 3.2 of Generic Letter 83-28. This completes GSU's response to all Sections of Generic Letter 83-28.

Should you have any questions please contact us.

Sincerely,

J. E. Booker
Manager-Engineering,
Nuclear Fuels & Licensing
River Bend Nuclear Group

JEB/MWH/1p

Attachment

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ATTACHMENT

SECTION 3.1

POST MAINTENANCE TESTING (Reactor Trip System Components)

Item 3.1.1

Administrative Procedures are provided to document that post-maintenance operability testing of safety-related components, including the Reactor Trip System, is conducted to assure the equipment is operable before being returned to service. These procedures currently include requirements:

- 1) for verifying the operable condition of a system/component to comply with Technical Specifications. Verification may be accomplished by either special testing or by adherence to surveillance testing. Components of the Reactor Trip System and other safety-related components are required (as a minimum) to be demonstrated operable by performance of the applicable Surveillance Test Procedure(s).
- 2) for control of corrective and preventive maintenance. Suitable maintenance checkouts such as Post Maintenance Surveillance, or Functional Tests specified in procedures or on Maintenance Work Requests are performed to ensure that the equipment will perform satisfactorily when placed in service.
- 3) to ensure that when requested maintenance has been performed, appropriate functional tests have been assigned and/or that the system has been properly restored to its normal configuration.
- 4) to ensure that instructions for restoration of component(s) to their required configuration is provided when performing Surveillance Test Procedures.

Item 3.1.2

River Bend Station has a procedure which insures that any appropriate test guidance as a result of vendor or engineering recommendations are included in maintenance procedures or Technical Specifications. This procedure provides a uniform systematic method for review of NRC I&E Bulletins and Notices, INPO Significant Event Reports, INPO/NSAC Significant Operating Event Reports, General Electric Service Information Letters, Vendor Manuals, and other documents which are generated offsite.

Appropriate recommendations are forwarded to the organization(s) required to take action. The status of each review is tracked until all required corrective actions (i.e Maintenance Procedure Revision, Technical Specification Change) are completed. This is an ongoing review.

Item 3.1.3

Technical Specifications for RBS are in draft form and currently under NRC review. A review of the draft Technical Specifications by GSU revealed no post-maintenance test requirements which degrade safety rather than enhance safety. Technical Specifications which are periodic in nature and not specific to post maintenance with the potential to degrade safe operation are being identified and rewritten or excluded from River Bend Station draft submittals. Final status is pending NRC approval. For Technical Specification changes concerning on-line functional testing see response to item 4.5.3 in the letter dated August 3, 1984 (GSU/Booker to NRC/Eisenhut RBG-18521).

SECTION 3.2

POST MAINTENANCE TESTING
(All Other Safety-Related Components)

Item 3.2.1

See response to Item 3.1.1

Item 3.2.2

See response to Item 3.1.2

Item 3.2.3

See response to Item 3.1.3

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

STATE OF TEXAS §
COUNTY OF JEFFERSON §
In the Matter of § Docket Nos. 50-458
GULF STATES UTILITIES COMPANY §
(River Bend Station,
Unit 1)

AFFIDAVIT

J. E. Booker, being duly sworn, states that he is Manager-Engineering Nuclear Fuels, and Licensing; that this position requires him to submit documents to the Nuclear Regulatory Commission in behalf of Gulf States Utilities; that the documents attached hereto are true and correct to the best of his knowledge, information and belief.

J. E. Booker
J. E. Booker

Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 20 day of MARCH, 1985.

Martin C. Medvedsky
Notary Public in and for
Jefferson County, Texas

My Commission Expires:

1-11-86