

GULF STATES UTILITIES COMPAN

RIVER BEND STATION POST OFFICE BOX 220 ST FRANCISVILLE, LOUISIANA 70775 AREA CODE 504 635-3237 387-4257

> January 28, 1985 RBG- 20013 File Nos. G9.5, G15.4.1

Mr. Robert D. Martin, Regional Administrator U. S. Nuclear Regulatory Commission Region IV, Office of Inspection and Enforcement 611 Ryan Flaza Drive, Suite 1000 Arlington, Texas 76011

FEB - 1 1985

Dear Mr. Martin:

River Bend Station Unit 1 Refer to: Region IV Docket No. 50-458/Report 84-38

This is in response to the Notice of Deviation contained in NRC I&E Inspection Report No. 50-458/84-38. The inspection was performed by Mr. C. C. Harbuck during the period December 3-7, 1984, of activities authorized by NRC Construction Permit CPPR-145 for River Bend Station Unit No. 1.

Gulf States Utilities Company's (GSU) response to the Notice of Deviation 84-38-01, "Failure to Meet FSAR Commitments", is provided in the enclosed attachment. This completes GSU's response to the Notice of Deviation.

Sincerely

W. J. Cahill Senior Vice President River Bend Nuclear Group

WJC/PJD/TFP TCC/trp

Attachment



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#### Response to Notice of Deviation

### Reference

1 . .

Notice of Deviation - E. H. Johnson letter to W. J. Cahill, dated December 27, 1984.

Refer to Docket No. 50-458/84-38.

Failure to Meet FSAR Commitments (84-38-01)

#### Response

### Corrective Steps Which Have Been Taken and Results Achieved

- 1. The FSAR, Section 14.2.12.1.36, was reviewed and the intent of the commitment evaluated against the actual preoperational test (1-PT-309-1). The results of our evaluation indicate that the intent of the commitment, i.e., demonstration of the functional capability of the standby diesel generator at operating conditions, has been satisfied. In accordance with preoperational test procedure, 1-PT-309-1, the diesel was started, within 5 minutes of the 24 hour load test, using an emergency start signal and loaded using grid load at a rate faster than the diesel's normal loading sequence. The method used to perform this test is more conservative than the FSAR commitment using normal loads in sequence.
- 2. The preoperational test procedure, 1-PT-309-1, was reviewed against the FSAR commitment. Since procedure 1-PT-309-1 has been completed, an entry on the system Master Punch List (MPL) has been made to track the need to perform this test as a special situation test prior to fuel load. Additionally, a review of FSAR Chapter 14 and applicable preoperational test procedures has been performed to assure commitments are addressed in the procedures. The review did not indicate any procedures for which commitments were ommitted; however, nine procedures were identified as needing revision to acceptance criteria format and to eliminate confusion and misinterpretation. These procedures have been revised.

## Corrective Steps Which Will be Taken To Avoid Further Deviations

- 1. No further corrective action planned.
- 2. The need to assure procedure compliance to FSAR commitments will be stressed to personnel who prepare, review, and approve the preoperational test procedures and test results. Clarifications to

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FSAR Chapter 14 will be in an FSAR amendment prior to fuel load.

# Date When Full Compliance Will Be Achieved

1. In full compliance.

1....

2. Full compliance will be achieved by fuel load.

# UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

STATE OF LOUISIANA	5			
PARISH OF WEST FELICIANA	5			50-458 50-459
In the Matter of	5	Docket	Nos.	
GULF STATES UTILITIES COMPANY	5			

(River Bend Station, Unit 1)

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#### AFFIDAVIT

W. J. Cahill, Jr., being duly sworn, states that he is a Vice President of 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 cc-rect to the best of his knowledge, information and belief.

Cahill,

Subscribed and sworn to before me, a Notary Public in and for the State and Parish above named, this <u>28</u> day of <u>January</u>, 19<u>85</u>.

oan

Joan W. Middlebrooks Notary Public in and for West Feliciana Parish, Louisiana

My Commission is for Life.