

APPENDIX

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-458/85-04

Construction Permit: CPPR-145

Docket: 50-458

Licensee: Gulf States Utilities (GSU)
P. O. Box 2951
Beaumont, Texas 77704

Facility Name: River Bend Station (RBS)

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

Inspection Conducted: January 28-February 1, 1985

Inspectors: WR Bennett 2/20/85
W. R. Bennett, Reactor Inspector Date
Project Section A, Reactor Project Branch 1

CC Harbuck 2/20/85
C. C. Harbuck, Reactor Inspector Date
Project Section A, Reactor Project Branch 1

Approved: J. P. Jaudon 2/20/85
J. P. Jaudon, Chief, Project Section A Date
Reactor Project Branch 1

Inspection Summary

Inspection Conducted January 28-February 1, 1985 (Report 50-458/85-04)

Areas Inspected: Routine, unannounced inspection of the integrated emergency core cooling system and loss of offsite power preoperational test procedure and of licensee actions on previous items. The inspection involved 72 inspector-hours onsite by two NRC inspectors.

Results: Within the two areas inspected, no violations or deviations were identified.

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DETAILS

1. Persons Contacted

GSU

- *W. J. Cahill, Senior Vice President
- *T. L. Crouse, Manager, Quality Assurance
- *P. J. Dautel, Licensing Staff Assistant
- *J. C. Deddens, Vice-President, River Bend Nuclear Group
- *O. DeMiranda, Quality Assurance Engineer
- *D. R. Derbonne, Preoperational Supervisor
- *P. E. Freehill, Superintendent, GSU Startup and Test
- *K. J. Giadrosich, Senior Quality Assurance Engineer
- *J. R. Hamilton, Supervisor NSSS Projects
- *G. R. Kimmell, Supervisor, Operations Quality Assurance
- *G. .. King, Supervisor, Plant Services
- *I. M. Malik, Supervisor, Quality Engineering
- *T. F. Plunkett, Plant Manager
- *S. R. Radebaugh, Assistant Superintendent, GSU Startup and Test
- *P. F. Tomlinson, Director, Quality Assurance, Operations
- *P. Wolfinger, Startup and Test Engineer

Stone and Webster Engineering Corporation

- *W. I. Clifford, Senior Construction Manager
- *S. Dhingra, HVAC Principal Engineer
- *F. W. Finger, Project Manager, Preliminary Test Organization (PTO)
- *B. R. Hall, Field Quality Control, Assistant Superintendent
- *R. E. Helms, Test Engineer, PTO
- *O. A. Kotanides, Hydrostatic Test Engineer
- *W. A. Matson, Vice President and Senior Manager of Projects
- *R. L. Spence, Resident Quality Control Manager

The NRC inspectors also contacted other licensee personnel including administrative, quality assurance, and test personnel.

*Indicates attendance at exit interview on February 1, 1984.

2. Followup On Previous Inspection Findings

- a. (Closed) Open Item (458/8438-03): Licensee procedure 1-PT-201, "Standby Liquid Control System Preoperational Test," did not adequately state the method for verifying flow into the reactor pressure vessel (RPV).

The licensee committed to amend the procedure to be specific concerning the method for verifying flow into the RPV. The NRC inspector reviewed the official field copy of licensee

procedure 1-PT-201 and found that it had been amended on January 8, 1985, in accordance with this commitment. This item is closed.

- b. (Open) Unresolved Item (458/8438-02): Standby Diesel Generator Jacket Water System Temperature Requirements - The standby jacket water temperature specified in licensee procedure 1-PT-309-1, the Division I standby diesel generator preoperational test, was changed with a minor change request (MCR) without adequate technical justification stated in the change. On account of this and because the licensee did not know the standby temperature requirements, the question of whether or not an MCR was the appropriate revision method could not be determined. The NRC inspectors had requested that the licensee provide an adequate technical justification and further that the jacket water standby temperature requirements specified by the manufacturer be determined.

The NRC inspectors found that the licensee still did not have a documented rationale for the MCR although licensee representatives made a verbal presentation. The licensee committed to perform additional engineering analysis on this item in order to determine if a safety and/or design problem exists and if licensee procedure 1-PT-309-1 had been changed incorrectly by use of an MCR instead of a major change request or a test exception. This item will remain open until the licensee's engineering evaluation is completed and reviewed by the NRC.

- c. (Closed) Deviation (458/8430-01): Failure to Meet a Commitment to the NRC - The licensee failed to repair permanently the damaged Division I standby diesel generator jacket water system exhaust manifold shroud prior to system turnover as committed to in the construction deficiency final report for DR-172 of July 6, 1984.

The NRC inspectors reviewed the licensee's response to this deviation dated January 21, 1985, and verified that the corrective actions discussed therein have been accomplished. The corrective action to prevent recurrence essentially consisted of distributing a letter of reminder to licensee personnel to ensure that individuals responsible for implementing NRC commitments should do so on time. With regard to the missed commitment for DR-172, the corrective action was a new commitment to complete the shroud repair prior to fuel load. The NRC inspectors reviewed the licensee's revised final response to DR-172 of January 9, 1985, which contained this commitment and reviewed the nonconformance and disposition report (No. 6933) which detailed the planned permanent shroud repair. (A review of the licensee's final resolution of DR-172 will be accomplished at a future inspection.) The NRC inspectors concluded that the licensee's corrective action for this deviation appeared to be adequate. This item is closed.

3. Preoperational Test Procedure 1-PT-210, "Integrated Emergency Core Cooling System (ECCS) and Loss of Offsite Power (LOP)"

The purpose of reviewing the integrated ECCS preoperational test procedure was to ascertain whether or not it was consistent with regulatory requirements, guidance, and licensee commitments.

The NRC inspectors compared licensee procedure 1-PT-210, Revision 0, to test requirements committed to by the licensee in the RBS FSAR Section 14.2, paragraph 14.2.12.1.44.

The NRC inspectors determined that several FSAR commitments for this preoperational test either contained technical errors, did not reflect the as-built design, or did not adhere to current regulatory guidance. (All of these items had previously been identified by the licensee and corrective actions were being initiated as discussed below.)

The NRC inspectors found that the procedure followed some of these FSAR commitments despite the errors they contained. The licensee stated that this problem would be corrected by submitting FSAR changes and issuing a major revision to the procedure. This revision would ensure that the procedure reflected the as-built design and regulatory guidance.

For the remaining FSAR discrepancies the procedure already had been written to reflect the correct requirements. In such cases where the procedure was correct, but differed from the FSAR, which was incorrect, the licensee planned to submit test exceptions against the FSAR, which would remain open until an FSAR change was approved. The NRC inspectors concluded that this was acceptable because the procedure would test the actual as-built design and would be technically accurate.

Since the procedure revision discussed above was to result in many significant changes to the procedure, including those concerning FSAR errors, the licensee committed to provide a copy of the revision at least 1 week prior to the test commencement.

Except for the conditions just described, licensee procedure 1-PT-201 appeared to satisfy FSAR test commitments for the integrated ECCS and LOP preoperational test.

The NRC inspectors noted that the procedure contained reference to numerous interim operating instructions (IOIs), but did not specify them by number. Since nearly all system lineups for the integrated ECCS test are governed by these IOIs, the NRC inspectors expressed a concern that all these IOIs needed to be reviewed specifically to ensure that they are adequate to meet the requirements of the ECCS test.

In addition, the NRC inspectors noted that an important part of the test procedure, special situation test 14 (SST-14), "Load Shedding and Sequencing," had not yet been written and was, therefore, unavailable for the required NRC review.

No violations or deviations were identified.

4. Exit Meeting

The NRC inspectors met with licensee representatives denoted in paragraph 1. The NRC senior resident inspectors for operations and construction both attended this meeting. The NRC inspectors summarized the purpose, scope, and findings of the inspection at this meeting.