

APPENDIX A

NOTICE OF VIOLATION

Gulf States Utilities  
River Bend Station

Docket: 50-458/84-31  
Permit: CPPR-145

Based on the results of an NRC inspection conducted during the period of September 16 through October 31, 1984, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C, 49 FR 8587, dated March 8, 1984), the following violations were identified:

1. Inadequacy of Preoperational Test Procedure

Criterion V of Appendix B to 10 CFR Part 50, states, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

Section 14.2.12.1.35 of the River Bend Final Safety Analysis Report states that the remote shutdown preoperational test shall "Demonstrate in conjunction with the nuclear boiler preoperational test that the three designated safety relief valves can be operated from the remote shutdown panel."

Section 1.2.3 of the Remote Shutdown System Preoperational Test Procedure, 1-PT-200, Revision 1, states that "The ADS valve portion of Remote Shutdown System will be tested via 1-PT-202. This includes all interlocks and component operation from remote shutdown panels."

Contrary to the above, the remote shutdown system preoperational test does not demonstrate in conjunction with any other preoperational test that the three designated safety relief valves can be operated from the remote shutdown panel. The Automatic Depressurization System Preoperational Test Procedure, 1-PT-200, Revision 0, does not test all interlocks and component operation from remote shutdown panels for the designated safety relief valves.

This is a Severity Level IV Violation. (Supplement II D) (458/8431-02)

2. Failure to Provide Adequate Class 1E Circuit Separation

Table 1.8-1 of the River Bend Final Safety Analysis Report states compliance with Regulatory Guide 1.75, Revision 2, "Physical Independence of Electric Systems, which endorses the Institute of Electrical and Electronic Engineers (IEEE) Standard 384-1974, Criteria for Separation of Class 1E Equipment and Circuits."

Section 5.62 of IEEE Standard 384-1974 states that the minimum separation distance between redundant Class 1E equipment and wiring internal to the control switchboards, where analysis is not performed, shall be 6 inches. In the event the above separation distance is not maintained, barriers shall be installed between redundant Class 1E equipment and wiring.

Contrary to the above, redundant Class 1E wiring internal to the remote shutdown panel 1C61\*PNLP001 supplied by General Electric Company, does not meet the minimum separation distance of 6 inches. Division I (red) wiring on terminal block 3C01 is approximately 4 1/4 inches from bundled Division II (blue) wiring. No analysis was performed of the reduced separation distance, nor were any barriers installed as required.

This is a Severity Level IV Violation. (Supplement IID)(458/8431-03)

Pursuant to the provisions of 10 CFR 2.201, Gulf States Utilities is hereby required to submit to this office, within 30 days of the date of this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

Dated: DEC 07 1984