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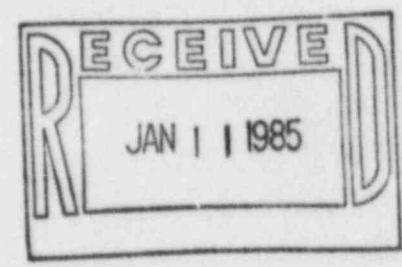


GULF STATES UTILITIES COMPANY

RIVER BEND STATION POST OFFICE BOX 220 ST. FRANCISVILLE, LOUISIANA 70775
AREA CODE 504 635-8094 346-8651

January 7, 1985
RBC-19843
File Nos. G.9.5., G.15.4.1

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



Dear Mr. Martin:

River Bend Station - Unit 1
Refer to RIV
Docket No. 50-458/Report 84-31

This is in response to the Notice of Violations contained in NRC I&E Inspection Report No. 50-458/84-31. The inspection was conducted at the River Bend Station construction site by Mr. D. D. Chamberlain during the period September 16 through October 31, 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 Violations 84-31-02, "Inadequacy of Preoperational Test Procedure", and 84-31-03, "Failure to Provide Adequate Class 1E Circuit Separation," is provided in the enclosed attachment. This completes GSU's response to the Notice of Violation 84-31-02; an interim or final response to the Notice of Violation 84-31-03 will be provided by March 1, 1985.

Sincerely,

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

PJD TCC
WJC/PJD/TCC/cmc

Attachment

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PDR ADDCK 0500045B
G PDR

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ATTACHMENT

Response to Notice of Violation

References

Notice of Violations - E. H. Johnson letter to W. J. Cahill, dated December 7, 1984.

Refer to: Docket 50-458/84-31

1. Inadequacy of Preoperational Test Procedure (84-31-02)

Response

Corrective Steps Which Have Been Taken and the Results Achieved

Master Punch List (MPL) Item #1 for Boundary Identification Package (BIP) SVV.000 (Automatic Depressurization System-ADS) has been added. This item states "Add Section To 1PT-202 To Test SHS Function of ADS Valves". (SHS is the Remote Shutdown System.) This statement will cause the preoperational test (PT) for ADS to include those steps of the Remote Shutdown System that were not completed.

The ADS preoperational test 1-PT-202 Rev. 0 was disapproved for incompleteness. When the requirements of the MPL Item #1 is included in Rev. 1 of 1-PT-202, the PT will receive additional review and approval.

Corrective Steps Taken to Avoid Further Violations

Test Instruction (TI-3), Changes to Test Procedures, of the StartUp manual was revised to state:

"When a Major Change Request (MCR) deletes a procedure and states that the requirement will be addressed in a different procedure, the author of the MCR shall ensure that the requirement is appropriately added to the affected MPL (unless it is already part of the referenced procedure)".

This statement requires that the test engineer add a statement to the MPL of the other system(s) when it is determined that the PT being conducted cannot complete all the requirements of the Final Safety Analysis Report Chapter 14 for that system.

Additionally, the other PT's are being reviewed to ensure that FSAR commitments are properly addressed.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved by January 27, 1985.

January 7, 1985

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ATTACHMENT

Response to Notice of Violation (continued)

2. Failure to Provide Adequate Class 1E Circuit Separation (84-31-03)

Response

Corrective Steps Which Have Been Taken and the Results Achieved

- A. Deficiency Report 264 was initiated for evaluation of 10CFR50.55(e) reportability. General Electric (GE) determined by analysis that had the situation remained uncorrected, it would have had no effect on plant safety over the operational life of the plant.
- B. GE Field Deviation Disposition Request No. LDI-2487 has been issued to correct the identified nonconforming condition.
- C. General Electric has identified all GE-supplied non-PGCC panels that have more than one division wiring, and Stone & Webster Engineering Corporation Field Quality Control is inspecting them for compliance with Regulatory Guide 1.75, Rev. 2, separation requirements. This inspection is in progress and will not be completed until January 21, 1985.

Corrective Steps Which Will Be Taken to Avoid Further Violations

The Stone & Webster Engineering Corporation FQC inspection is in progress and will determine if this is an isolated case or whether it exists elsewhere in GE-supplied panels at River Bend Station. If it is determined to be an isolated case, no further action will be necessary. If however, it is determined to exist elsewhere, the additional nonconformance will be evaluated for impact on the safe operation of the plant, and the analysis and/or reconfiguration will be accomplished.

Date When Full Compliance Will Be Achieved

The date when full compliance has been or will be achieved will be provided by March 1, 1985.


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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

(River Bend Station,
Unit 1)

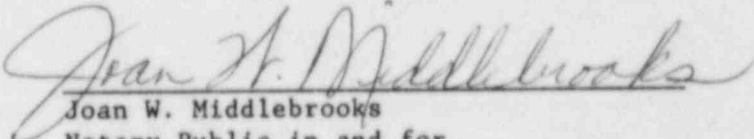
AFFIDAVIT

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 correct to the best of his knowledge, information and belief.



W. J. Cahill, Jr.

Subscribed and sworn to before me, a Notary Public in and for the State and Parish above named, this 7th day of January, 1985.



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

My Commission is for Life.