ENCLOSURE 3

GULF STATES UTILITIES COMPANY

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DEC 24

Mr. James L. Milhoan
Regional Administrator
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

River Bend Station - Unit 1
Docket No. 50-458/92-99

Dear Mr. Milhoan,

Gulf States Utilities Company (GSU) has completed its review of the Systematic Assessment of Licensee Performance (SALP) report for River Bend Station (RBS) for the period April 1, 1991 through September 26, 1992. The purpose of this review was not only to identify actions to correct weaknesses identified in the report, but also to review the effectiveness of the specific action plans which had been developed to cause improved performance in each SALP functional area. We have noted that many of the issues identified in the report can be resolved through improved teamwork and effective communication. GSU has made and will continue to make progress in teamwork through training and other initiatives. To improve communications, GSU will meet with key NRC personnel to clearly understand expectations and ensure effective communication. We also plan to perform special assessments in the radiation protection and security areas to assist in identifying improvements which will raise the level of performance during the next SALP period.

GSU continues to have a goal of improving the performance rating in all areas, with an ultimate goal of all Category 1 ratings, and believes that the actions identified will result in substantial progress toward meeting this goal during the present SALP period. We intend to implement these actions such that RBS performance is raised to the point of excellence. Of course, this performance will be focused on fully meeting GSU's responsibility of providing safe and reliable operations at RBS.

93-0496

Attached is a summary of the results of the review conducted for each SALP category. We intend to follow actions identified and continue to improve the action plans as necessary throughout the SALP period so that our goal is met. If you have any questions concerning our plans or other comments on our response to the SALP report, please feel free to call me at (504) 381-4374.

Sincerely,

Philip D Graham

P.D. Graham
Vice President
River Bend Nuclear Group

WHO/LAE/DNL/kvm

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Attachment

Response to IR 92-99

PLANT OPERATIONS

The operations staff is dedicated to a high standard of excellence in the safe operation of RBS. GSU management supports the high standards identified in the SALP report. We are pleased with the recognition that weaknesses addressed in the previous SALP report, warranting NRC's former identification of a declining trend, have been addressed with effective corrective action. In addition, both routine and event response performance by the operations staff was judged very good, enforcement history and management involvement was regarded excellent, and operability determinations were deemed conservative.

Improvements in operations will be accomplished during the current SALP period by focusing on individual performance and accountability. To improve consistency in operations, guidance will be established with written policies and procedures where weaknesses are noted. Enhancements to personnel performance monitoring programs in operator training as well as plant operations will detect additional areas needing increased attention. Performance will be raised in those areas to a superior level, through implementation of existing interdepartmental action plans.

Operations and training management will review root cause analysis of the marginal performance during previous annual requalification examinations. Emphasis by training personnel, stress on the ownership of training activities by first line supervision, and interactive observation by operations management will be used to correct both performance and procedural inconsistencies.

Difficulties that were noted in emergency classification during training will be corrected by revision of Emergency Implementing Procedure (EIP)-2-001, "Classification of Events." Approval is expected in early 1993.

The effectiveness of housekeeping is being addressed by the plant wide commitment from all departments to the Plant Manager's Standards and Expectation on housekeeping. Recognition of the importance of this aspect of plant condition requires focused attention both during periods of plant outage and operation. Individual and departmental accountability for housekeeping will be assigned. The operations department will monitor plant housekeeping status and provide direct feedback at plant meetings to improve effectiveness.

RADIOLOGICAL CONTROLS

GSU management notes the NRC's recognition of excellence in several areas of the radiological controls functional area. These areas include the programs in radiological effluents,

confirmatory measurements validating the chemistry and radiochemistry programs, and radiological environmental monitoring. Management's strong commitment to an ALARA work environment, and effective solid radwaste and radioactive transportation programs were also cited. During the upcoming SALP period, we will work to maintain these programs at their current level while striving for superior implementation of the radiation protection program by means of individual accountability and improved performance by all our radiation workers.

GSU is concerned with the problems associated with adherence to program requirements. We recognize that although significant success has been achieved in the implementation of controls for high radiation areas, this success is not yet comprehensive. In addition to the actions described below we intend to perform a special assessment to identify other improvements to the program.

Management will work with discipline supervisors to ensure that an effective radiation worker training program is in place. In addition the discipline Supervisor will be held accountable for his worker's performance in radiological controls along with other aspects of safe job accomplishment.

The radiation deficiency report, noted as a positive initiative in the previous SALP period, will be used as a tool to improve performance. These reports will be dispositioned in a timely manner and will be summarized, trended, and presented to the Plant Manager on a regular basis. The accountability for contaminations will likewise be improved through a similar accountability mechanism.

The volume of transient radioactive material requiring control, survey and storage at the end of our fourth refueling outage challenged the radiation protection staff and our programs for proper disposition of the material. Our staff identified a number of performance deficiencies. We have subsequently identified to the NRC our comprehensive corrective actions that significantly strengthen our program with additional barriers and improved personnel performance. These barriers include additional spot surveys of radioactive materials enroute to the radwaste building, as well as additional verification surveys of material prior to release based on preestablished levels of control. Adequate manning levels for post-outage radioactive material disposition will be established as part of the planning process for our fifth refueling outage. Equipment that is better suited for bulk surveys will also be utilized.

Further implementation of our radwaste minimization program will reduce challenges to radiological material handling performance. Improved personnel performance in this functional area will be achieved in the coming cycle through a number of ongoing initiatives. These include improved communications within the Radiation Protection Department achieved through regular group meetings, team training coordinated with other disciplines, and implementation of a standing improvement committee staffed at the technician level. Improved communications with front line technicians and first line supervisors is a prerequisite to promptly identifying problems and their solutions.

Applicable elements of radiation worker training will be integrated with discipline training on a formal basis. In lieu of solely relying on discreet radiation worker training, the integrated training will reinforce the relevance of radiation worker requirements to the specific plant task. This training will include both mock-up and in-plant training scenarios.

MAINTENANCE/SURVEILLANCE

GSU notes the NRC's recognition of improvements in the implementation of GSU's maintenance program. Specific notation was made of an effectively implemented temporary modification program, resolution of items previously identified by the maintenance team inspection, and a noteworthy program for inservice inspections.

Management is committed to raising the standard of performance of all maintenance to the level of excellence. We believe continued improvement can be achieved through the application of principles of professionalism, by driving accountability for all aspects of performance to the first line supervisors, and by continuation of our action plan items for maintenance improvement. Action plans are currently implemented for the following areas:

- Maintenance work practice, with a goal of measurable improvement achieved through holding foremen accountable and enhancing attention to detail
- Preventive maintenance optimization, including establishing complete and accurate job plans for each task
- Work control, including improving the quality of work packages with clear, precise instructions
- Management oversight

The SALP report noted instances where inadequate work plans contributed to performance deficiencies. Management will aggressively continue the programs noted above to assure that the worker in the field possesses the detailed work packages required for successful maintenance. In addition, we plan to make significant progress on improving vendor manual information during 1993. The upgrade will more effectively facilitate use of vendor information. GSU has also developed a maintenance planner training program to be implemented during the upcoming SALP period. As for the error caused in implementation of the diesel vendor procedure, we will continue to utilize system engineering oversight on key contracts in the refueling outage to improve performance.

Several deficiencies in the performance of surveillance testing were outlined in the SALP report. Complete details of root cause and corrective action have been previously provided to the NRC in all noted cases. In all cases, a thorough review of the unique circumstances of the error was expanded to ensure a similar or related error would be detected and effective actions taken to preclude a related occurrence. In the case of the missed surveillance of the hydrogen igniters

due to inadequate procedure change review, a multi-discipline task force reviewed the entire Technical Specification bases and a second task force reviewed a sample of all surveillance test procedures to insure Technical Specification requirements were adequately addressed. To date over twelve man-months of expanded training on the 10CFR50.59 process have been devoted to prevent a related occurrence.

The plant physical condition has been significantly improved through major projects such as the completion of the closed loop service water system and replacement of the reactor pressure vessel feedwater nozzle safe end. Significant maintenance activities such as the refurbishment and modification of the reactor recirculation pumps and motors, MOV refurbishment and testing, the fire seal penetration upgrade program, and significant modifications such as the MCC short circuit modification to address Information Notice 92-18, the inclined fuel transfer system upgrade, and the modified feedwater pump minimum flow valve also contributed to an improved plant physical condition. Over 7,300 items of corrective maintenance and 11,200 preventive maintenance tasks have been completed in the past SALP period. In addition, RBS management is committed to continuing its long term commitment to painting the plant. The painting process is prioritized to enhance plant maintenance, to improve lighting and safety, and to support potential decontamination needs.

EMERGENCY PREPAREDNESS

GSU is pleased to again have its efforts in emergency preparedness accorded the NRC's superior rating, Category 1. The previously indicated trend was reversed due to a strong emergency response organization and management involvement and support. Command and control, use of approved procedures, coordinated duties for the control operating foreman and improvements in the dose assessment program have been addressed by procedural changes and intense training in these areas.

GSU is committed to improving the realism associated with the use of the simulator during emergency preparedness drills. The primary effort involving the upgrading of the simulator computer's hardware and software is underway. Proper protective action recommendation determinations by operating crews have been addressed by training. GSU has also made considerable effort to upgrade our emergency classification procedure, including emergency action levels (EALs).

SECURITY

GSU previously recognized the weaknesses identified in the SALP report and is committed to improve security management control. To meet our expectations for program excellence, we have identified specific actions as described below. In addition, we will perform a special assessment of security to identify additional areas requiring action.

The Security Effectiveness Review Committee (SERC) was established to provide a review function for security management similar to the Facility Review Committee. This committee

membership includes Security, Quality Assurance, Licensing, Corporate Security and the security contractor. An intensive three-day teamwork training session has been provided to the security management team. Supervisory skills training and 10CFR50.59 training have also been provided to appropriate security management personnel. Further technical and management training is also planned. Security management will also participate in QA audits at other utilities and meet with neighboring nuclear utilities to compare activities and identify areas for potential improvement. In addition, GSU management and our security contractor will strengthen their oversight and awareness of security activities by conducting and documenting the results of tours of security facilities.

Through the implementation of the above actions, GSU is confident that the measures noted above will preclude the recurrence of concerns similar to those identified in the SALP report and that performance in the security area will be greatly improved.

ENGINEERING/TECHNICAL SUPPORT

In the areas of engineering and technical support GSU will seek to continue a high level of management involvement and to maintain and further improve the excellent technical capabilities noted in the SALP report. Engineering management will place even greater emphasis on areas characterized as "good" performance until excellence is achieved.

In the staffing area, eighteen (18) additional GSU engineering positions have been created, and dependence on contract engineers is being reduced. As of December, 1992, eight contract engineers have become GSU employees or have been replaced by GSU employees.

The program for implementing the commitments to NRC Generic Letter 89-10 has been revised to correct identified weaknesses. We will continue to emphasize quality in this important area so that accurate and dependable MOV test results are obtained without adverse impact to the plant.

To address the need for a focused list of modifications released for work, the following information is provided. Two prompt modification request (PMR) logs were previously available in the control room. One identified all the canceled or removed PMRs, while the other listed all of the open PMRs (designed or implemented). The closed log has been removed from the control room and only the open/active PMR list is now available. Control room drawings are also stamped to indicate PMRs and MRs which are released for work. River Bend Station has also just developed a modification request implementation group. This maintenance group receives all PMRs and MRs directly from Engineering. The MR implementation group reviews the modifications and places them on a level I schedule. This fiscal year schedule is updated weekly and will be distributed to the control room. The MR implementation group also provides the Planning and Scheduling Department with this information.

The current process for root cause determination was established to insure that the root cause program was not diluted by being invoked unnecessarily. We reviewed a larger sample of

condition reports (200) and found that over 45 percent received a root cause evaluation. GSU will review industry practices of selective use of the root cause process for optimal overall effectiveness of the program, and apply the results of the review to our condition report program. In addition, Training will review and update the root cause analysis course to ensure that this issue is addressed.

GSU recognizes the NRC's concern with resolution of Thermo-lag issues. Since the special inspection in May, 1992, it has become apparent that the issues which are still unresolved have industry-wide implications. Other items noted as concerns have been corrected or addressed in accordance with the schedule established in GSU's May 6, 1992 letter. GSU is an active member of NUMARC's Ad Hoc Advisory Committee on Thermo-Lag issues. The committee is working to address those issues generically applicable to the industry. These issues include items requiring NRC guidance on how to maintain compliance. Final resolution of Thermo-Lag issues at River Bend Station will be based on the results of NUMARC sponsored activities.

The SALP report states that GSU failed to take timely corrective action to resolve issues related to failure to implement certain provisions of the fire hazards analysis. In its response to Inspection Report 50-458/90-02, GSU committed to have an independent contractor perform a review and verification of the fire hazards analysis. During the review, additional discrepancies or problems were identified. Several of the problems required lengthy and detailed analysis to address. The identified problems were prioritized for resolution based on safety significance, and where appropriate, GSU took immediate and conservative action to ensure continued safe operation.

Welder and welding procedure qualification concerns were resolved at the time of identification. Welders and welding procedures were qualified in accordance with the NRC's interpretation of ASME code requirements. In addition, maintenance has committed to retraining of the welding organization with respect to interpretation of welding code requirements and the possible effect on plant components.

GSU acknowledges the weakness identified in the I&C technical training program. A comprehensive review of the maintenance, RP, and chemistry training programs has been completed. Program and training material upgrades are in progress and are scheduled to be implemented during the current SALP period.

The cause of the errors in the RBS check valve program procedure, PEP-054, was related to the incorrect identification of the valves included in the Inservice Testing (IST) Program. A procedure change will be made to address this issue.

A detailed analysis of the error associated with the failure to generate a condition report following the failure of the safety relief valve accumulator check valves has been previously provided. This personnel oversight will be precluded in the future through review and reinforcement of the requirement in the IST procedures. This will ensure that a condition report is generated when failures occur, or when required on certain ASME XI pumps and valves.

SAFETY ASSESSMENT/QUALITY VERIFICATION

GSU's action plans in this functional area are designed to improve our performance to a Category 1. We believe our performance in this functional area, while improved during this SALP period, can be raised to the Category 1 performance level by continuing to implement our SALP improvement action plans. Action plans to improve the timeliness of license amendments has not only improved the timeliness, but through better communications, has improved completeness. GSU is working to convert to the improved Technical Specifications in cooperation with the other BWR-6 owners, consistent with industry schedules. This effort includes removal of detailed lists from the Technical Specifications pursuant Generic Letter 91-08 as well as other improvements.

Enhancements to the root cause analysis program were successful in improving the quality of root cause analyses. Additional personnel involved in preparing or reviewing root causes analyses are being trained with the improved root cause analysis training program. GSU has also corrected the specific problems related to procurement and has revised related procedures to ensure that similar problems do not recur.

Actions to improve the QA audit program continue so that the audits are consistently performance based audits. Improved audit checklists utilizing performance based questions and industry good practices, and continuing the involvement of technical specialists in the conduct of audits are addressed in other action plans. A monthly briefing of the senior management is now being conducted to improve the visibility of audit results.

GSU has completed the past due evaluations of potentially reportable conditions under 10CFR21 and has revised the program to use a similar process to that used for 10CFR50.73 reportability evaluations to assure timely 10CFR21 evaluations. With respect to 10CFR50.72 and 10CFR50.73 reportability evaluations, we recognize the difference in interpretation of reporting requirements for the example described in the report. GSU will continue to support both NRC and industry efforts to develop guidance in this area and looks forward to the NRC's issuance of NUREG-1022 Rev. 1.

Effective communications with the NRC is a high priority for GSU management. We desire to have an excellent reputation with regards to open, timely and technically accurate communication at all levels of our organization. We will strive to reach this level of performance and appreciate the NRC's timely feedback in this regard.