



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

MAR 26 1985

Docket Nos.: 50-458/459

MEMORANDUM FOR: Hugh L. Thompson, Jr., Director
Division of Licensing

FROM: Thomas M. Novak, Assistant Director
for Licensing
Division of Licensing

SUBJECT: STATUS OF CONSTRUCTION COMPLETION
AND TESTING AT RIVER BEND STATION

A meeting is scheduled between the Director, NRR and Gulf States Utilities (GSU) for 3:00 p.m. March 26, 1985 to discuss the status of construction completion and testing at River Bend Station. A proposed agenda for that meeting is at the end of this memorandum.

The applicant, Gulf States Utilities (GSU), intends to request a license to load fuel and go to 5% power with a number of construction and test items incomplete. On January 14, 1985, GSU formally notified NRC of seven construction items which GSU projects will be incomplete at fuel load; fifteen testing items incomplete at fuel load as well as six licensing actions under review.

Enclosure 1, consisting of Table 1, 2, and 3, is a synopsis of the GSU submission of January 14, 1985 and presents the comments received from the NRC staff to date on these issues. Enclosure 2 is the GSU submission.

While GSU contends that each construction and test completion item have no safety significance, the NRC staff has identified some items of completion which would require an exemption from the GDC. However, the NRC staff has raised the concern that while each deferred item taken one at a time could be justified; the magnitude of the list is such that it may well divert management's attention from plant start-up and operation (See Enclosure 3). We expect the applicant to provide justification for why this should not be a concern.

The staff has identified two areas of disagreement with the applicant on the deferral schedules:

- Safe/Alternate Shutdown- applicant is proposing a deferral until first refueling outage. Staff is willing to consider deferral to 5% power.
- Radwaste Building HVAC- applicant is proposing a deferral of charcoal loading and final balancing to 5% power. Staff states deferral of charcoal loading beyond fuel load is unacceptable.

CONTACT: Steve Stern
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PLANT READINESS

During the meeting with Region IV, the GSU indicated that April 15, 1985 is their current official estimated fuel load date. However, it was determined that only 18 of 102 systems required for fuel load have been turned over to the GSU plant staff. Additionally, of the 41 systems requiring ASME certification only 6 are so certified as of March 20, 1985. Of 107 preoperational tests, only 19 have been completed and reviewed by the applicant. An additional six tests have been completed but not yet reviewed by the applicant. Also, 48 other tests are started. The remaining 34 tests had not been started as of March 20, 1985.

We are concerned that this status is not consistent with the applicant's fuel load date, particularly since large numbers of deficiencies are typically developed during test, requiring major construction or retest efforts before the system can be declared operational.

EQUIPMENT QUALIFICATION

GSU is asking for permission to delay completion until after November, 1985. The regulations at 10 CFR 50.49(i) can be read to allow the Director, NRR to grant an operating license only up to November 30, 1985 with incomplete equipment qualifications.

DIESEL GENERATORS

In addition, River Bend has two Transamerica De Laval, Inc. (TDI) emergency diesel generators, model R-48. These are essentially the same as the diesel generators at Shoreham. Most preoperational testing of these diesel generators has been completed. NRR is currently assessing the capacity of these diesels. While the capacity is expected to be less than the nameplate rating, the applicant contends that these diesels are capable of supplying the emergency load. NRR staff assessment is expected to be completed by April 15, 1985. This problem may require additional procedures to mitigate against exceeding diesel capacity during an emergency.

TECHNICAL SPECIFICATIONS

On March 15, 1985, NRR formally transmitted the second draft of the River Bend Technical Specifications. If these Technical Specifications are to be completed on schedule, the applicant must expeditiously submit to NRC written descriptions and in depth justification for all changes to the second draft of Technical Specifications. We are currently working on a best effort basis which would result in Technical Specification completion in early July.

A recommended agenda for this meeting is:

- (1) Construction Completion and Test Status
- (2) GSU management plan for completing construction and testing during reactor start-up without reducing managements attention to plant performance.
- (3) Technical Specifications
- (4) Possible exemptions to GDC.

The Directors of DE, DSI and DHFS and Region IV staff have been invited to this meeting.

Original signed by:

Thomas M. Novak, Assistant Director
for Licensing
Division of Licensing

Enclosures: As stated

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03/22/85	03/22/85	05/14/85

Table 1
**STATUS OF CONSTRUCTION
 COMPLETION
 RIVER BEND STATION**

Applicant Proposal	NRC Staff Comment
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A. Cooling Water

● **Cooling Towers**

- 2 of 4 complete & operable at fuel load
- 3rd tower complete 6/15/85
- 4th tower complete 11/1/85

- No exemption required (DSI/AD/CPS)

- Acceptable (RegIV)

- Not safety related

● **Make-up water intake**

- Structure & clarifier to be complete prior to 5% power (but after fuel load)
- Well water used for make-up until 5% power
- Construction completion outside protected area

B. Solid Radwaste System

● **Waste sludge tank & pump**

- not installed at fuel load
- tested & installed 4/1/86, 3 months after commercial operation (DSI/AD/CPS)
- sludge tank feeds to be piped to contractor solidification unit

- Technically acceptable (DSI/AD/RP)
- Scheduler exemption required (GDC-3)
- Subject to ALARA review (RegIV)
- Temporary system subject to certification request? (RegIV)

C. Fuel Building Sampling System

- Scheduled for completion prior to off-loading spent fuel at first refueling outage

- Applicant should commit to a specific date for system completion (RegIV)
- Scheduler exemption required (DL)
- License condition on no off-loading fuel without system completion (DL)

Table 1 (Cont.)

STATUS OF CONSTRUCTION COMPLETION RIVER BEND STATION

Applicant Proposal

NRC Staff Comment

D. Elevators

- Elevators in Radwaste, Auxiliary & Control buildings
 - not complete at fuel load
 - complete prior to first refueling outage
 - stairways provide access

- Need to assess impact of lack of elevators on ability to move equipment in an emergency or support normal operation (Reg IV)
- Do emergency procedures allow for no elevator? (Reg IV)
- Potential confusion of ongoing construction during plant operation, refueling & shutdown activities (DL)

E. Post Accident Sampling System

- Installed & tested prior to 5% power
- No significant radioactivity or heat decay <5% power

- No exemption required (DE/AD/MCET)
- License condition should be imposed (Reg IV)
- Scheduler exemption may be required due to incomplete system as per FSAR design (DL)

F. Control Rod Drive Maintenance Facility

- Portion of CRD Maintenance facility within Reactor Building complete at fuel load
- Portion in Auxiliary Building complete before first refueling outage

G. Miscellaneous

- Berm around Unit 2 excavation **completed** prior to fuel load
- Completion not required until 5% power/initial criticality (DE/AD/MCET)
- Building roof & storm drains not related to start-up or operation deferred until first refueling outage
- Final acceptance of non-safety buildings, yardwork, etc. complete by first refueling outage

Table 2

STATUS OF TEST COMPLETION RIVER BEND STATION

Applicant Proposal	NRC Staff Comment
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1) Off-Gas System

- | | |
|--|--|
| <ul style="list-style-type: none"> ● Complete prior to installing head on reactor & beginning of heatup process | <ul style="list-style-type: none"> ● Technically acceptable (DSI/AD/RP) ● Impose license condition (RegIV) |
|--|--|
-

2) Off-Gas Vault Refrigeration

- | | |
|---|--|
| <ul style="list-style-type: none"> ● Same as No. 1 above | <ul style="list-style-type: none"> ● Acceptable (DSI/AD/RP) |
|---|--|
-

3) Off-Gas Area Ventilation

- | | |
|---|--|
| <ul style="list-style-type: none"> ● Same as No. 1 above | <ul style="list-style-type: none"> ● Acceptable (DSI/AD/RP) |
|---|--|
-

4) Turbine Building Equipment Drains & Floor Drains

- | | |
|---|--|
| <ul style="list-style-type: none"> ● Complete prior to heat-up | <ul style="list-style-type: none"> ● Impose license condition (RegIV) ● Acceptable (DSI/AD/RP) |
|---|--|
-

5) Turbine Building Unit Coolers

- Operable at fuel load
 - Balancing portion of acceptance test complete prior to 5% power
-

6) Turbine Building Cranes & Hoists

- | | |
|--|---|
| <ul style="list-style-type: none"> ● Acceptance test at first refueling outage ● Installed | <ul style="list-style-type: none"> ● Acceptance test must be complete prior to use for design function (RegIV) ● Potential impact upon turbine & accidental radioactive release due to accidental load drop during testing (DL) |
|--|---|
-

7) Make-up Water to Auxiliary Control Building

- | | |
|--|--|
| <ul style="list-style-type: none"> ● Will be complete at fuel load except testing of water flush for a liquid radwaste element in radwaste effluent stream ● Testing complete at heat-up | <ul style="list-style-type: none"> ● Acceptable (DSI/AD/RP) |
|--|--|
-

8) Radwaste Building HVAC

- | | |
|--|---|
| <ul style="list-style-type: none"> ● Preoperational test complete at fuel load ● Charcoal loading & final balancing complete by 5% power | <ul style="list-style-type: none"> ● Deferral not acceptable (DSI/AD/RP) ● Charcoal should be in place prior to critical operation (RegIV) ● Scheduler exemption required (DL) |
|--|---|

Table 2 (Cont)

STATUS OF TEST COMPLETION RIVER BEND STATION

Applicant Proposal

NRC Staff Comment

9) Auxiliary Building & Hot Machine Shop Hoists

- Complete at first refueling outage
- Must be complete prior to use for design function (Reg IV)

10) Generator H₂ & CO₂

- Acceptance test prior to exceeding 5% power

11) Miscellaneous Building Floor Drains

- Testing schedule to be complete by turbine roll (7-8% power)
- Need confirmation no radiation release paths involved (DL)

12) Electrical & Piping Tunnel HVAC

- Testing schedule to be complete prior to heatup
- No appreciable heat load until 5% power

13) Auxiliary Control Building Ventilation

- Operable by licensing
- Adequacy of control room isolation? (DL)
- Balancing no complete until turbine roll
- Interim: field adjustment

14) Domestic Water System

- Presently functional
- Include decontamination showers? Any relation to fire water system? (Reg IV)
- Formal turnover to applicant prior to first refueling outage

15) Sewage Treatment System

- Presently functional
 - State/local permits? (DL)
 - Formal turnover to applicant prior to first refueling outage
-

Table 3

STATUS OF LICENSING ACTIONS RIVER BEND STATION

(Additional construction/test completion delays)

Applicant Proposal	NRC Staff Comment
1) Bypassed & Inoperable Status	
<ul style="list-style-type: none"> ● SER Outstanding Issue #9 ● To be provided at first refueling outage ● INTERIM MEASURE: Manually actuated indications 	<ul style="list-style-type: none"> ● Additional justification required (RegIV)
2) Safe/Alternate Shutdown	
<ul style="list-style-type: none"> ● SER Outstanding Issue #3 ● Applicant requesting implementation schedule similar to that for oper. plants ● Main control room fire ● INTERIM MEASURE: Administrative actions to control combustible materials 	<ul style="list-style-type: none"> ● Deferral to first refueling outage not acceptable; deferral to 5% power acceptable (DE/AD/MCET) ● Additional justification required, if postulated fire would require control room evacuation (RegIV)
3) ATWS	
<ul style="list-style-type: none"> ● 10CFR6.2 requires applicant to propose implementation schedule ● Changes will not be made prior to first refueling outage 	
4) SPDS	
<ul style="list-style-type: none"> ● Testing complete at fuel load ● Operational procedures & training will not be complete until after commercial operation ● INTERIM MEASURE: Approved emergency procedures relying on existing plant instrumentation 	<ul style="list-style-type: none"> ● Not justified by applicant (RegIV)
5) 10CFR50 Appendix J	
<ul style="list-style-type: none"> ● Request exceptions for leak rate testing for the sealing of air locks & use of ANSI/ANS 56.8-1981 in primary leak containment leak rate testing 	<ul style="list-style-type: none"> ● Should be processed prior to conducting air lock seal tests, preoperational Type A test & 5% power authorization (DSI/AD/RS)
6) 10CFR55a	
<ul style="list-style-type: none"> ● ISI for pumps & valves identified alternate methods to ASME code requirements 	<ul style="list-style-type: none"> ● Resolve prior to fuel load (RegIV)



GULF STATES UTILITIES COMPANY

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January 14, 1985
RBG-19,890
File G9.5

Mr. A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Schwencer:

River Bend Station Unit 1
Docket No. 50-458

To facilitate discussions with your staff regarding the status of River Bend Station Unit 1, I am enclosing a draft listing of those activities which are a part of the normal construction completion and test sequence that are to be completed following fuel load. We believe this sequencing follows good and logical construction and test practices and is consistent with management of resources without compromise to quality and safety.

Sincerely,

J. E. Booker
Manager-Engineering,
Nuclear Fuels & Licensing
River Bend Nuclear Group

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STATUS OF CONSTRUCTION COMPLETION AND TESTING

AT FUEL LOAD

I. Construction Completion Items At Fuel Load

A. Normal Cooling Water:

Discussion:

The station circulating water system is designed to provide the cooling water for the main condenser with sufficient makeup to meet normal system losses (such as evaporation and drift from the cooling towers and blowdown) in order to operate at full power. This design calls for four mechanical draft multi-celled cooling towers to provide the cooling for the circulating water (FSAR Section 10.4.5) and a makeup water intake structure and clarifier to provide the makeup (FSAR 9.2.11).

At fuel load, two of the four normal cooling towers will be completed and operable. Two of the normal cooling towers provide sufficient cooling water to achieve approximately 60% of full reactor power. The third normal cooling tower is to be completed in construction by June 15, 1985 and operable at the 60% of full reactor power point - approximately 4 months after fuel load. The third normal cooling tower provides additional cooling for circulating water to achieve 90% of full reactor power. Construction of the fourth normal cooling tower is to be completed in construction by September 15, 1985 with testing completed approximately 6 weeks later. This will support the schedule for full power operation of the unit.

The source of the makeup water is the Mississippi River. An intake structure and its associated pumps, piping, and equipment are located in an area recessed from the completed embayment and barge slip area on the Mississippi River. The makeup water is pumped from the river and conveyed by piping to the up-flow clarifier and then by gravity flow to the normal cooling tower basin. Completion of the intake structure and the clarifier is scheduled to take place prior to exceeding 5% of full reactor power - approximately 6 weeks after fuel load.

Initial circulating water inventory and any required make-up will be provided from the construction stage dewatering system wells and/or the permanent plant deep well system. The capacity and quality of water provided by the well water systems are sufficient to meet the circulating water requirements for 5% of full reactor power.

The construction completion activities for these cooling water systems take place outside the protected area. Also the

structures associated with these systems (and the system themselves) are classified as non nuclear safety and are non seismic category I.

B. Solid Radwaste System

Discussion:

The solid radioactive waste (radwaste) system consists of the piping, valves, and equipment necessary to provide a solid waste stream to the solidification contractor for processing. Included in this equipment are the waste sludge tank and its associated waste sludge pump which normally collect, mix, and transport the waste sludge to the contractor's solidification unit (FSAR section 11.4).

At fuel load, the waste sludge tank and the waste sludge pump will not have been installed. This tank and its associated pump are scheduled to be installed and the system tested by April 1, 1986 - three months after commercial operation. Instead the waste sludge tank feeds from the phase separator tanks and the backwash tank will be piped, via flanged connections, directly to the contractor's solidification unit. Each of the sludge tank feeds (phase separator tanks (2) and backwash tank (1)) has a recirculation line (with the capability of producing a homogeneous mixture) and a sample point located at the discharge of the associated tank's (separator or backwash) effluent pump. The contractor's solidification unit can be operated with this hook-up without restriction on plant operation. The solid radioactive waste system is classified as non nuclear safety and non seismic category I.

The system at fuel load (and in its completed form) will function in a manner to assure that collection, solidification, packaging, and storage are performed so as to maintain potential radiation exposure to plant personnel to as low as is reasonable achievable (ALARA) levels in accordance with Regulatory Guide 8.8 and within the dose limits of 10CFR20.

C. Fuel Building Sampling System

Discussion:

The fuel building sampling system is used during refueling and spent fuel storage for the purpose of determining the fuel building spent fuel pool water quality (FSAR section 9.1.3). Since the movement of spent fuel assemblies is performed under water, the water must be clear to provide good visibility during these movements. The fuel building sampling system will be completed prior to off-loading spent fuel from the reactor at the first refueling outage. If for some unforeseen reason irradiated fuel must be off-loaded to the fuel building spent fuel pool prior to the first refueling outage and the fuel building sampling system is not operable, grab samples will be taken to ascertain water quality. The fuel building sampling system is classified as non nuclear safety and non seismic category I.

D. Elevators

Discussion:

The elevators located in the radwaste, auxiliary, and control buildings will not be completed at fuel load. They will be completed after station commercial operation but prior to operation following the first refueling outage. Stairways located in these buildings provide ready access. These elevators are classified as non nuclear safety and non seismic

E. Post Accident Sampling System

Discussion:

The post accident sampling system would be utilized following a severe accident to sample the reactor building environment in an effort to determine the amount of core damage. Installation of post accident sampling systems became a requirement following the issuance of NUREG-0737. The post accident sampling system will be installed and tested prior to exceeding 5% of full reactor power - approximately 6 weeks after fuel load. Since no significant amount of radioactivity or decay heat is generated from testing below 5% of full reactor power the system is not needed in advance of this.

F. Control Rod Drive Maintenance Facility

Discussion:

The control rod drive (CRD) maintenance facility is used in the normal servicing of the CRD's. That portion of the maintenance equipment located in the reactor building will be completed at fuel load. The CRD maintenance equipment in the auxiliary building will be completed prior to the first refueling outage. This maintenance system is not needed for start-up or power operations.

G. Other Miscellaneous Activities - Yard Work, Drains and Building Turnovers (Non-Safety Related Buildings)

Discussion:

Yard work activities are those activities associated with final dress-up of site. These remaining activities will be completed consistent with the site environmental recovery plan which calls for completion during the first year of commercial operation. For drainage purposes, the construction of the berm around the Unit 2 excavation will be completed prior to fuel load. Building roof and storm drain activities such as installation of gutter downspouts are not related to plant startup or operations and therefore are scheduled to be completed prior to operation following the first refueling outage. Non safety related building turnovers involve the final acceptance of the non safety related building. Painting and other cosmetic type activities are included here. These remaining activities will be completed prior to operation following the first refueling outage. The activities associated with yard work, drains, and non safety related building turnovers are classified as non nuclear safety.

II. Testing Completion Remaining At Fuel Load

Discussion:

The following testing activities are currently not scheduled to be completed at fuel load. The system to be tested will have been completed and will have passed the appropriate generic construction tests at fuel load. These systems are classified as non nuclear safety and non seismic category I.

BIP*	System PT/AT*	FSAR Chapter 14	R.G.* 1.68	Comments
OFG.000	PT606	14.2.12.1.28	1.1.2	<u>Off-gas system.</u> The system is not required prior to condensing reactor generated steam in the main condenser. Completion of the testing will be done prior to installing the head on the reactor and beginning the heatup process - approximately 5 weeks after fuel load.
HVT.002	PT-408-2	14.2.12.1.49	1.n.14.e	<u>Off-gas vault refrigeration.</u> The system will be completed consistent with the completion of the off-gas system (prior to heatup - approximately 5 weeks after fuel load).
HVT.006	AT-408-3	14.2.12.1.49	1.n.14.e	<u>Off-gas area ventilation.</u> Completion of testing of the off-gas area ventilation system will be consistent with the completion of the off-gas system (prior to heatup - approximately 5 weeks after fuel load).
DET.000 DFT.000	AT-609-2 AT-609-6	14.2.12.1.68	1.n.9	<u>Turbine building equipment drains and floor drains.</u> The system will be operable at fuel load to support plant operation (generic testing complete). The acceptance test will be complete prior to heatup - approximately 5 weeks after fuel load.
HVT.003	AT-408-1	14.2.12.1.49	1.n.14.e	<u>Turbine building unit coolers.</u> These unit coolers will be operable (generic testing complete) at fuel load but the air, fluid flow, and temperature balancing cannot be completed until ambient heat loads from area equipment are present. This final balancing portion of the acceptance test is to be completed prior to exceeding 5% power.

BIP*	System PT/AT*	FSAR Chapter 14	R.G.* 1.68	Comments
MHT.000	AT-701-4	N/A	N/A	<u>Turbine building cranes and hoists.</u> These are installed but are not required for initial startup and operation of the plant. They are to be used during normal maintenance activities. The acceptance test for these will be completed prior to commercial operation at the first refueling outage.
MWS.004	AT-659-2	N/A	N/A	<u>Makeup water to radwaste and aux control building.</u> This system will be completed at fuel load except for the testing of the water flush for the liquid radwaste radiation element located in the liquid radwaste effluent stream going to the station discharge. This testing will be completed by heatup - approximately 5 weeks after fuel load. As during normal operation of the liquid radwaste system and during the period between fuel load and heatup, any liquid radwaste discharge is done on a batch basis and each batch is analyzed prior to release.
HVW.000	PT-407	14.2.12.1.46	1.n.14.e	<u>Radwaste building HVAC.</u> The preoperational test will be completed at fuel load. Charcoal loading and final balancing will be completed prior to 5% power. Therefore these activities will be completed before significant activity levels are generated.
MHP.000	AT-701-3	N/A	N/A	<u>Auxiliary building and hot machine shop hoists and cranes.</u> These hoists and cranes are not required for operation of the plant. The acceptance testing for these will be completed prior to commercial operation at the first refueling outage.
GMR.000	AT-123	N/A	N/A	<u>Generator H2 and CO2.</u> The system is to be completed before fuel load. The acceptance test is scheduled to be completed prior to exceeding 5% power. This system will not be required until the main generator is synchronized - at about 7% to 8% power or approximately 8 weeks after fuel load.

BIP*	System PT/AT*	FSAR Chapter 14	R.G.* 1.68	Comments
DFM.000	AT-609-4	14.2.12.1.68	1.n.9	<u>Miscellaneous building floor drains.</u> The testing is scheduled to be complete by turbine roll - at about 7% to 8% power or approximately 8 weeks after fuel load. These are floor drains in non-safety related structures which would not be required until the equipment in the area is in operation.
HVY.001 and .005	AT-414-1	N/A	1.n.14.e	<u>Electrical and piping tunnel HVAC.</u> This test is scheduled to be completed prior to heatup - approximately 5 weeks after fuel load. No appreciable heat load is expected in these areas until after 5% power.
HVS.000	AT-415	N/A	1.n.14.e	<u>Aux. control building ventilation.</u> This system will be operable by fuel load, but the balancing will not be completed until turbine roll - at about 7% to 8% power or approximately 8 weeks after fuel load. This system will be field adjusted to provide adequate aux. control room operator and equipment ventilation prior to final balancing.
DWS.001 DWS.002	AT-655	N/A	N/A	<u>Domestic water system.</u> The system is presently functional. Formal turnover and acceptance by GSU of this system will take place prior to commercial operation at the first refueling outage.
PBS.000	AT-654	N/A	N/A	<u>Sewage treatment system.</u> The system is presently functional. Formal acceptance by GSU of this system will take place prior to commercial operation at the first refueling outage.

*BIP - Boundary Identification Package
 *PT/AT - Preoperational Test/Acceptance Test
 *R.G. - Regulatory Guide

III. Licensing Items Under Review

1. Regulatory Guide 1.47 - SER Outstanding Issue 9

Discussion:

The Staff has required additional bypass and inoperable status indication for River Bend Station. GSU has agreed to provide additional automatic indication as noted in our letter of December 3, 1984 (RBG-19,612). However, in that letter we also requested that we be allowed to implement these design changes after fuel load but prior to operation following the first refueling outage. Until the additional automatic indication is provided in the control room, equipment availability will be indicated to the operator via similar manually actuated indications which will be controlled via procedure.

2. Safe/Alternate Shutdown (Main Control Room Fire) - SER Outstanding Issue 13

Discussion:

The Staff has required that one train of equipment free of fire damage be provided to safely shutdown the plant in the event of a transient fire. River Bend Station (RBS) has this capability for all required fire areas except the main control room. GSU has agreed to provide this capability for a transient fire in the main control room as indicated in our letter of December 21, 1984 (RBG-19,754). However, we requested in that letter, that we be allowed to implement these design changes on a schedule consistent with that required for operating plants. The current design of RBS, 24-hour occupancy in the control room, and the use of administrative actions to control combustible materials in the main control combine to provide a low likelihood for the main control room transient fire.

3. ATWS - SER Section 15.8

Discussion:

The NRC is requiring design and operation improvements to reduce the likelihood of failure to scram and to mitigate the consequences of an ATWS. GSU is evaluating the necessary improvements required by the newly issued 10CFR50.62.

As stated in the RBS SER (NUREG-0989), "...the Staff has generally concluded that BWR's can continue to operate because the risk from ATWS events in this period (prior to implementation) is acceptably small."

The RBS SER also indicates the Staff expects "that the necessary plant modifications will be implemented in 1 to 4 years following a Commission decision on ATWS," and "the Staff considers this issue resolved for the purpose of issuing a full power license", but indicates that the Commission will determine the required modifications and schedule for implementation.

10CFR50.62 requires that we propose a schedule and that it be mutually agreed upon by the Commission and the licensee. Based on the Commission's direction and its intent to issue a Generic Letter on implementation schedules, it is not anticipated that changes will be made prior to the first refueling outage.

4. Generic Letter 82-33 - Safety Parameter Display System (SPDS)

GSU identified to the NRC Staff in a letter (RBG-15,815) dated August 31, 1983 that the SPDS (Emergency Response Information System for River Bend) would be fully functional by February 1986. Although the testing of the SPDS will be completed prior to fuel load, the operational procedures and training for its use will not be completed until after commercial operation. In the interim, approved emergency procedures relying on existing plant instrumentation will be used.

5. 10CFR50 Appendix J

A draft of the River Bend Technical Specifications was submitted to the NRC on July 17, 1984 (RBG-18,233). The NRC draft BWR/6 Standard Technical Specifications were used as a guide in preparing the River Bend Tech Specs. The NRC and GSU are currently reviewing the Tech Specs. It is expected that the exceptions identified in the Draft Standard Tech Specs

concerning leak testing for the sealing of air locks and use of ANSI/ANS 56.8-1981 when conducting a primary containment leak rate test will be requested.

6. 10CFR50.55a

The River Bend Inservice Inspection Plan for pumps and valves was submitted to the NRC on November 5, 1984 (RBG-19,359). Within the Plan, approximately ten alternate methods to ASME Code inspection requirements were proposed. The NRC has the proposal under review at this time.