



GULF STATES UTILITIES COMPANY

RIVER BEND STATION POST OFFICE BOX 220 ST. FRANCISVILLE, LOUISIANA 70776
AREA CODE 504 635-8094 346-8651

December 19, 1985
RBG- 22866
File Nos. G9.5, G15.4.1

Mr. Robert D. Martin, Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

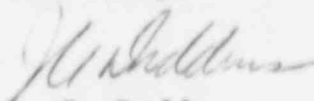
Dear Mr. Martin:

River Bend Station - Unit 1
Refer to: Region IV
Docket No. 50-458/Report 85-69

This letter responds to the Notice of Violation contained in NRC I&E Inspection Report No. 50-458/85-69. The inspection was performed by Messrs. D. D. Chamberlain, W. B. Jones and R. P. Mullikin during the period September 16 through October 31, 1985 of activities authorized by NRC Operating License NPF-40 for River Bend Station Unit No. 1.

Gulf States Utilities Company's (GSU) response to the Notice of Violation 85-69-01A, "Failure of Document Control Program" and 85-69-01B, "Improper Use of a Field Change Notice (FCN)," are provided in the enclosed attachment. This completes GSU's response to the Notice of Violation.

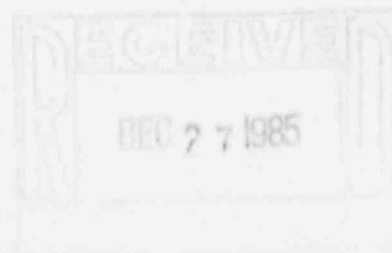
Sincerely,


J. C. Deddens
Vice President
River Bend Nuclear Group

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PDR ADDOCK 05000458
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Attachment



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ATTACHMENT

December 19, 1985
RBC- 22866

Response to Notice of Violation
Severity Level IV

Reference

Notice of Violation - L. E. Martin letter to W. J. Cahill, Jr. dated November 19, 1985.

Refer to Docket No. 50-458/85-69.

A. Reason for Violations

On October 18, 1985, it was discovered that approved modification request (MR) design packages and approved field change notices (FCN) had not been posted against affected design documents and they had not been distributed to document control stations. For example, FCN 85-0397-19 was not posted against drawing 12210-ESK-5ENS06 and it was not available at the document control stations. Several other examples of the failure to post and distribute MRs and FCNs were noted.

The Corrective Steps Which Have Been Taken & Results Achieved

Procedure NPE-3-006 (River Bend Station Design and Modification Request Control Plan) was supplemented by issuance of an Interim Procedure Change IPC-3-006-2-2 on December 12, 1985. A revision to the Nuclear Plant Engineering (NuPE) procedure NuPE-AA-54 (Guidelines and Instructions for Processing Modification Requests) was issued December 4, 1985. This procedure controls River Bend Station's (RBS) engineering activities for handling MR's and, in conjunction with NuPE-AA-59, is used to ensure that the holder of the design data base is notified of design modifications and that RBS's Change Control Document Reporting System (IS-217 Report) is updated to list these changes against the affected documents. NuPE-AA-59 (Updating and Distributing Design Documents) was revised and issued November 22, 1985. The revision to NuPE-AA-54 includes more detailed instructions for completing the MR and routing of same. In addition, this revision has a mandatory requirement that a computer data input form be completed and included as a numbered page of all MR's. This data input form contains spaces which correspond to the input fields in the IS-217 Report referenced above. The location of this input form within the MR is identified on the MR Cover Sheet; it is

normally the second sheet in the MR document. All documents affected by the MR are consolidated and listed on this input form. A similar practice has also been adopted for FCN's.

Upon approval of an MR or FCN by NuPE, the following occurs:

- 1 - A copy is forwarded to the field for implementation.
- 2 - A copy is formally transmitted to the holder of the design data base for updating the IS-217 Report and for making distribution to document control stations.
- 3 - A copy is now forwarded to the control room document station for immediate posting via "redlining" the IS-217 Report.

Prior to transmitting the change documents to the holder of the design data base an internal review is performed by the NuPE Design Control Coordinator to ensure that procedural requirements (including completion of the IS-217 data input form) are adhered to.

In addition to redlining the IS-217 Report, a verification is performed by the control room document station clerical supervisor to ensure that MR's or FCN's are included in subsequent issues of the report. This practice will continue until it has been demonstrated that change documents are posted in the appropriate manner.

A condensed IS-217 Report is now being issued which lists only the change documents which are required to be incorporated into a given affected document (i.e., information only changes are not included). This report is intended to reduce the information which must be considered to only those changes which have impact on the documents.

Administrative changes have been implemented by NuPE and the holder of the design data base to reduce the time between design change approval and posting against the affected documents. For example, the staff responsible for updating the IS-217 Report has been relocated to an area immediately adjacent to the group responsible for design control interface between GSU and the design data base holder. Initial surveillance indicates that the time lag between approval of the design modification and posting against the affected documents has reduced significantly.

A 100% audit of the MR files, which includes FCNs, has been conducted to determine if similar cases exist. Some additional discrepancies were discovered and steps have been taken to resolve them. However, all of these deficiencies occurred prior to issuance of the revised procedure, indicating that the above actions have precluded the recurrence of similar events.

Corrective Action to Prevent Recurrence

In addition to the actions implemented above, training of all Nuclear Plant Engineering Personnel responsible for completing or handling MR's and FCN's began December 9, 1985 and will continue with retraining as procedures are reviewed.

Also, verbal instructions have been provided as necessary by cognizant individuals on a continuing basis since such activities began.

An interim Quality Assurance (QA) audit has been scheduled for January, 1986 to ascertain the effectiveness of these actions. The specific case (i.e., MR-85-0397 FCN 19) was rectified at the time of discovery, and subsequently FCN 19 was incorporated into FCN 23.

Date of Full Compliance

The training mentioned above and the correction of other deficiencies identified as a result of the audit of the MR files are scheduled for completion by December 31, 1985.

B. Reason for Violation

On October 18, 1985, it was discovered that FCN 85-0397-19 was approved and implemented to modify the function/control logic of the diesel generator output breaker to allow remote shutdown operation from the diesel generator panel in either the normal or emergency mode.

The Corrective Steps Which Have Been Taken & Results Achieved

Nuclear Plant Engineering Procedure NuPE-AA-64 (Control and Approval of Field Change Notices (FCNs)) was developed and issued November 18, 1985. This procedure provides detailed instructions and restrictions for the use of FCN's and in certain cases requires additional reviews. The limited use of FCN's for making changes to previously approved MR's is stressed throughout the procedure. A parallel surveillance of FCN's during implementation is conducted by Quality Assurance to ensure compliance to the procedure.

Corrective Action to Prevent Recurrence

In addition to the actions implemented above, training of all Nuclear Plant Engineering Personnel responsible for completing or handling MR's and FCN's began December 9, 1985 and will continue with retraining as procedures are revised.

Also, verbal instructions have been provided as necessary by cognizant individuals on a continuing basis since such activities began.

An interim Quality Assurance (QA) audit has been scheduled for January, 1986 to ascertain the effectiveness of these actions. The specific case (i.e., MR-85-0397 FCN 19) was rectified at the time of discovery, and subsequently FCN 19 was incorporated into FCN 23.

Date of Full Compliance

NuPE-AA-64 was approved and issued on November 18, 1985. The training mentioned above and the correction of other deficiencies identified as a result of the audit of the MR files is scheduled for completion by December 31, 1985.