

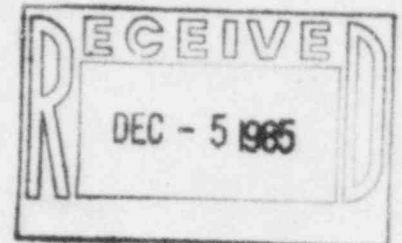


GULF STATES UTILITIES COMPANY

RIVER BEND STATION POST OFFICE BOX 220 ST. FRANCISVILLE, LOUISIANA 70775
AREA CODE 504 636-6094 346-8651

November 27, 1985
RBG- 22711
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 85-59

As discussed with Mr. Johns Jaudon of your staff, this letter is being submitted at this time in response to the Notice of Violation contained in NRC I&E Inspection Report No. 50-458/85-59. The inspection was performed by Messrs. W. R. Bennett and W. M. McNeill during the period August 19-23, 1985, 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 Violation 85-59-01, "Improper Disposition of Nonconformance Reports," is 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

WJC/DMR/GEE/RJK/amg

Attachment

IC-193/85

8601020344 851216
PDR ADOCK 05000458
Q PDR

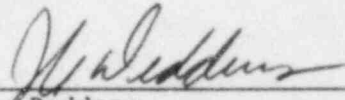
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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)

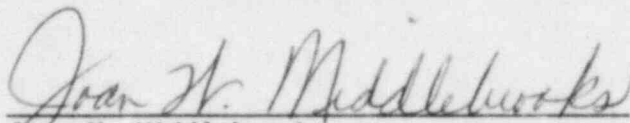
AFFIDAVIT

J. C. Deddens, 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.



J. C. Deddens

Subscribed and sworn to before me, a Notary Public in and for the State and Parish above named, this 27th day of November, 1985.



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

My Commission is for Life.

ATTACHMENT

November 27, 1985

RBG- 22711

Response to Notice of Violation
Severity Level IV

Reference

Notice of Violation - E. H. Johnson letter to W. J. Cahill, Jr. dated October 21, 1985.

Refer to Docket No. 50-458/85-59

Reason for the Violation

Nonconformance and Disposition (N&D) Report 12098 and Nonconformance Reports (NRs) 85NR0283 and 85NR0284 were dispositioned "accept as is" based on the unproven possibility that test instrumentation was inaccurate. These reports identified conditions adverse to quality; specifically that test results did not meet test procedure criteria.

The Corrective Steps Which Have Been Taken and The Results Achieved

NR's 85NR0283 and 85NR0284 were initiated on August 13, 1985 to identify apparent deficiencies in Control Building Chiller Condenser Recirculation Pumps, 1SWP*P3C and 3B, respectively. During the generic pump performance tests the total dynamic head (TDH) for pump B was 36.96 ft. and for pump C was 37.55 ft. The rated TDH is 38 ft. of water at the rated flow of 530 gpm. On August 14, 1985, the NR's were dispositioned "accept as is" on the basis that the discrepancies noted were due to "inaccuracies/tolerances" in the methods and instrumentation used in the tests. The basis for accepting the performance of the pumps was incorrect. However, upon reviewing the design basis of the pumps, the rated flow of 530 gpm was met and exceeded during the generic performance tests. The function of the pumps is to maintain flow through the Control Building Chiller Condensers 1HVK*CHL1I and 1HVK*CHL1C. An engineering evaluation was performed on the Control Building heat load calculations. The results of the evaluation showed a reduced minimum requirement under design basis conditions for Service Water flow of 377 gpm (vs. a rated flow of 530 gpm) through the Control Building Chiller Condensers. This shows that the minor deficiencies in TDH noted during testing at various flow rates has no impact on Service Water System (SWP) operability and its ability to perform its intended function. Therefore, no unreviewed safety question

exists. A Final Safety Analysis Report (FSAR) Change Request has been initiated (10/31/85, RBG-22,500) to revise Tables 9.2-1, page 1 of 2 and 9.2-15 page 1 of 2. This information will be incorporated in a future FSAR amendment.

The original NR's have been superceded and revised by NR Void/Revision Requests 85NR0283-OA and 85NR0284-OA. The revised dispositions were "accept as is" but the justifications have been revised to state that the pumps met the design requirement, rated flow of 530 gpm.

Nonconformance and Disposition Report (N&D) 12098 was initiated on June 17, 1985 to identify apparent deficiencies in standby service water pumps 1SWP*P2B and 1SWP*P2D. The specific apparent deficiencies, noted during preoperational/acceptance test PT-256 dealt with the difference between pump horsepower calculated using motor current reading and motor nameplate data; and horsepower determined using the pump performance test curve. A criteria of $\pm 10\%$ conformity was utilized as acceptance criteria. The differences in horsepower for pumps 1SWP*P2B and 1SWP*P2D were 23.92 and 18.84 percent, respectively, when the pumps were operating at simulated shutoff conditions.

In an effort to reconcile the differences between the test results and the acceptable deviation, the engineer responsible for dispositioning the aforementioned Nonconformance and Disposition Report attempted to verify that no major discrepancies existed and that the discrepancies noted were due to "inaccuracies/tolerances" in the methods and instrumentation used in the tests. On this basis, N&D 12098 was dispositioned "accept as is" on June 29, 1985.

Accepting the equipment or test results, based on instrumentation inaccuracies (without having direct indication of the inaccuracies), is not appropriate as was noted above. However, upon further review, the pumps were determined to be acceptable based on the fact that the purpose and the pertinent requirements of preoperational test PT-256 were actually satisfied. This justification was indicated on the newly issued N&D No. 12724.

The purpose of PT-256 is to demonstrate the proper and reliable operation of the Standby Service Water System. This test was designed to demonstrate the following objectives.

- 1) The ability of the Standby Service Water System to provide design flow to all supplied components including the RPCCW supplied component,
- 2) The operation of all system interlocks, instrumentation, and controls,
- 3) The operation of all system components including pumps, valves, motors, and fans.

In addition to the above objectives, PT-256 was written to include a pump endurance run at normal flow to assure pump reliability in accordance with the recommendations of the NRC as set forth in IE Bulletin 83-05. The data tabulated for this run was also taken during the minimum submergence, pump runout, and simulated shutoff runs. Some of the data taken during the simulated shutoff runs is not required to satisfy the requirements set forth in IE Bulletin 83-05 and was only included to provide an operational data base. In addition, the pumps are not required to operate at a shutoff condition during standby service water system operation. Consequently, the test exceptions identified in N&D 12098 were written against data taken for information only and have no bearing on any of the above objectives or NRC commitments.

Corrective Action to Prevent Reoccurrence

Nuclear Plant Engineering (NuPE) and Stone and Webster Engineering Corporation (SWEC) Site Engineering Group (SEG) personnel have been instructed to not disposition technical issues based on instrument inaccuracies without having proper verification of the instrument inaccuracies. It is recognized that instrumentation which is permanently installed or used in testing are addressed in a recurring calibration program and should not be relied upon by operations or testing personnel if not calibrated as scheduled.

Date of Full Compliance

Full compliance with all corrective action measures were completed with the issuance of the revised disposition of 85-NR-0283 and 85-NR-0284 on October 23, 1985 and N&D No. 12724 on November 26, 1985.