

APPENDIX A

NOTICE OF VIOLATION

Gulf States Utilities  
River Bend Station

Docket: 50-458  
Operating License: NPF-47

During the NRC first round special team equipment qualification (EQ) inspection conducted during the period of November 2-6, 1987, at River Bend Station, and subsequently until December 18, 1987, at the NRC Region IV office, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the violations are listed below:

A. Failure to Adequately Support Qualification of Splices in Valve Operators

Paragraph (f) of 10 CFR 50.49 requires that qualification of each component must be based on testing or experience with identical equipment, or with similar equipment with a supporting analysis, to show that the equipment to be qualified is acceptable.

Paragraph (k) of 10 CFR 50.49 states that equipment previously required by the Commission to be qualified to NUREG-0588 (For Comment version), "Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment," need not be requalified.

Paragraph 5(1) of NUREG-0588 states that the qualification documentation shall verify that each type of electrical equipment is qualified for its application and meets its specified performance requirements. The basis of qualification shall be explained to show the relationship of all facets of proof needed to support adequacy of the complete equipment. Data used to demonstrate the qualification of the equipment shall be pertinent to the application and organized in an auditable form.

Contrary to paragraphs (f) and (k) of 10 CFR 50.49, and Section 5(1) of NUREG-0588, Category I, EQ Job Book (EQJB) 211.161 in the equipment qualification file (EQF) for T95 and 35 tape splices, used in Limitorque SMB/SB motor operators inside and outside containment, did not adequately support qualification (1) in that similarity between the tested in-line splice and the installed V-shape splice configurations was not established; and (2) the insulation resistance data taken during the in-line splice type test were not available in the EQF and consequently not reviewed for impact with regards to specified functional performance requirements of control circuits at RBS.

This is a Severity Level IV violation. (Supplement I)(458/8721-01)

B. Failure to Adequately Support Qualification of 300-Volt Instrument Cable

Paragraph (f) of 10 CFR 50.49 requires that qualification of each component must be based on testing or experience with identical equipment, or with similar equipment with a supporting analysis, to show that the equipment to be qualified is acceptable.

Paragraph (k) of 10 CFR 50.49 states that equipment previously required by the Commission to be qualified to NUREG-0588 (For Comment version), "Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment," need not be requalified.

Paragraph 5(1) of NUREG-0588 states that the qualification documentation shall verify that each type of electrical equipment is qualified for its application and meets its specified performance requirements. The basis of qualification shall be explained to show the relationship of all facets of proof needed to support adequacy of the complete equipment. Data used to demonstrate the qualification of the equipment shall be pertinent to the application and organized in an auditable form.

Contrary to paragraphs (f) and (k) of 10 CFR 50.49, and Section 5(1) of NUREG-0588, Category I, EQJB 241.242 in the EQF for Rockbestos Firewall III 300-volt instrument cable, did not adequately support qualification (1) in that similarity between the tested irradiation cross-linked insulation cable and the cable installed at RBS was not established (originally chemically cross-linked insulation cables were ordered at RBS and no information was available in the EQF to clarify what was installed); and (2) in that no functional performance requirements on instrumentation circuits were performed and documented in the EQF in consideration of cable insulation resistances. The EQF did not verify that these cable types had been evaluated to meet the necessary functional performance requirements specified.

This is a Severity Level IV violation. (Supplement I)(458/8721-02)

C. Failure to Adequately Support Qualification of Conax ECSA

Paragraph (f) of 10 CFR 50.49 requires that qualification of each component must be based on testing or experience with identical equipment, or with similar equipment with a supporting analysis, to show that the equipment to be qualified is acceptable.

Paragraph (k) of 10 CFR 50.49 states that equipment previously required by the Commission to be qualified to NUREG-0588 (For Comment version), "Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment," need not be requalified.

Paragraph 5(1) of NUREG-0588 states that the qualification documentation shall verify that each type of electrical equipment is qualified for its application and meets its specified performance requirements. The basis of qualification shall be explained to show the relationship of all facets of proof needed to support adequacy of the complete equipment. Data used to demonstrate the qualification of the equipment shall be pertinent to the application and organized in an auditable form.

Contrary to paragraphs (f) and (k) of 10 CFR 50.49, and Section 5(1) of NUREG-0588, Category I, EQJB 211.161 in the EQF for Conax electrical conductor seal assembly (ECSA), did not adequately support qualification in that similarity between the tested ECSA and those installed was not

established at RBS. The test profile, contained in the EQF, did not envelope the 100-day postaccident operating time. The EQF did not verify that the installed ECSAs had been evaluated to meet the necessary functional performance requirements specified.

This is a Severity Level IV violation. (Supplement I)(458/8721-03)

D. Failure to Adequately Support Qualification of MOV Terminal Blocks

Paragraph (f) of 10 CFR 50.49 requires that qualification of each component must be based on testing or experience with identical equipment, or with similar equipment with a supporting analysis, to show that the equipment to be qualified is acceptable.

Paragraph (k) of 10 CFR 50.49 states that equipment previously required by the Commission to be qualified to NUREG-0588 (For Comment version), "Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment," need not be requalified.

Paragraph 5(1) of NUREG-0588 states that the qualification documentation shall verify that each type of electrical equipment is qualified for its application and meets its specified performance requirements. The basis of qualification shall be explained to show the relationship of all facets of proof needed to support adequacy of the complete equipment. Data used to demonstrate the qualification of the equipment shall be pertinent to the application and organized in an auditable form.

Contrary to paragraphs (f) and (k) of 10 CFR 50.49, and Section 5(1) of NUREG-0588, Category I, the EQJB BOP-Limitorque and EQJB SRN S03 for Limitorque motor operators, did not adequately support qualification (1) in that the terminal block (TB) types used within the operators were not identified in the documentation file; (2) no methodology to establish qualification of these TB's were in the documentation file; and (3) a similarity analysis, to demonstrate qualification of TBs used in operators represented by the EQJB SRN S03 file, was not available.

This is Severity Level IV violation. (Supplement I)(458/8721-04)

Pursuant to the provisions of 10 CFR 2.201, Gulf States Utilities is hereby required to submit a written statement or explanation to this Office within 30 days of the date of the letter transmitting this Notice. This reply, should include for each violation: (1) the reason for the violation if admitted, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas  
this *19th* day of *April* 1988.