

APPENDIX A

NOTICE OF VIOLATION

Gulf States Utilities  
River Bend Station (RBS)

Docket: 50-458  
Operating License: NPF-47

During an NRC inspection conducted during the period August 8-12, 1988, a violation of NRC requirements was identified. The violation involved failure to properly evaluate and document surveillance test results. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), the violation is listed below:

Failure to Properly Evaluate and Document Surveillance Test Results

Title 10, Part 50, Appendix B, Criterion XI, "Test Control," of the Code of Federal Regulations states, in part, ". . . Test results shall be documented and evaluated to assure that test requirements have been satisfied." Criterion XI is implemented by RBS Quality Assurance Directive (QAD)-11, Revision 5, "Test Control." This Directive also requires that recorded data reveal the adequacy of the equipment or systems to meet the specified requirement in the acceptance criteria. Further implementation of these documents is provided by RBS administrative procedures (ADMs) as discussed below. Section 8.3.1 of ADM-0015 specifically disallows use of test exceptions when acceptance criteria cannot be met. Section 8.6 of ADM-0015 requires that all data, calculations, notes, etc., which are essential in proving the acceptability of a surveillance test procedure (STP), shall be recorded on the data line provided or attached to the procedure.

Contrary to the above, the following failures were identified:

- A. Test data for STP-051-4210, completed on October 13, 1987, was incomplete in that page 24 of the 60-page procedure contained no test data. This precluded ascertaining that the data had been properly documented and evaluated as required by 10 CFR 50, Appendix B, Criterion XI.
- B. Test exceptions were written for performance of Sections 7.3.4 and 7.5.4 of STP-403-0601, "Standby Gas Treatment System Annulus Mixing System Functional Tests." Writing test exceptions on an acceptance criterion that cannot be met constituted a violation of Section 8.3.1 of ADM-0015. Also, the adequacy of the system to meet the specified requirements in the acceptance criteria was not revealed by the recorded data as required by QAD-11.
- C. The data and calculation for the average stroke rate of Valve 1B33-HYVFOGOB timed in Step 7.4.12 of STP-053-0601, "Recirc Flow Control Valve Operability Test," were not included in the data package completed on October 24, 1987, as required by Section 8.6 of ADM-0015.

This is a Severity Level IV violation. (Supplement I)(458/8818-01)

Pursuant to the provisions of 10 CFR 2.201, Gulf States Utilities is hereby required to submit to this office within 30 days of the date of the letter transmitting this Notice, a written statement or explanation in reply, including for each violation: (1) the reason for the violations if admitted, (2) the corrective steps which have been taken and the results achieved, (3) the corrective steps which 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 1st day of September 1988.