GULF STATES UTILITIES COMPANY

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March 5, 1986
RBG- 23301
File Nos. G9.5, G9.25.1.5

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

Dear Mr. Martin:

River Bend Station - Unit 1
Docket No. 50-458

Attached for your information is a report containing a brief description of changes to the River Bend Station (RBS) initial test program (ST-22) and a summary of the safety evaluation for the changes. This report is provided with regard to the RBS Facility Operating License NPF-47, Section 2.C(12).

Sincerely,

Eddie R Grant

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

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ATTACHMENT

SUMMARY DESCRIPTION OF CHANGE
(ST-22)

OBJECTIVE

Regulatory Guide 1.68 (Revision 2; August 1978), Appendix A, paragraphs 4.u and 5.s require demonstration of the operability during low power testing and calibration and performance verification during power ascension testing of the Pressure Regulator system. Startup Test 22, Pressure Regulator, determines the response of the system to rapid pressure setpoint changes and at specified test conditions the load limit setpoint will be set so that the transient is handled by control and/or bypass valves. Backup pressure regulator takeover will be tested by simulating a failure of the selected pressure regulator and regulator settings will be optimized. Performance of this test is planned for Test Conditions 1-6. It is proposed to delete the Pressure Regulator tests at Test Condition 4, the backup pressure regulator takeover testing at Test Condition 5 and the Automatic Load Following mode tests at Test Conditions 3 and 6.

DISCUSSION

The Automatic Load Following (ALF) mode of operation is not a safety related function, but, is instead an operational improvement. Since it consists of non-essential equipment, the ALF mode may be disabled and no testing in the ALF mode is required for the Pressure Regulator System.

Test Condition 4 is in the region of natural circulation, and current Plant Technical Specifications do not allow continued operation at this condition. Since testing is performed at Test Conditions 3 and 5, and Test Condition 4 is not an intended mode of operation, the testing can be deleted. The objectives and requirements of Regulatory Guide 1.68, paragraphs 4.u and 5.s are still satisfied with the remaining testing.

Testing of the backup pressure regulator is performed by simulating the failure of a selected pressure regulator. This test is currently planned to be performed at Test Conditions 2, 3, 5 and 6. Testing at Test Conditions 2, 3 and 6 provides adequate demonstration of the capability of the backup pressure regulator to control pressure in the event of a failure of the controlling pressure regulator.

CONCLUSION

Disabling the ALF mode of operation does not affect any safety related systems or the safe operation of the plant and does not involve an unreviewed safety question. Testing of the Pressure

Regulator system at Test Condition 4 is not required since the plant will not normally operate in this mode and Plant Technical Specifications do not allow continued operation at natural circulation conditions. Therefore, deletion of Test Condition 4 testing does not affect any safety related systems or the safe operation of the plant and does not involve an unreviewed safety question. Testing of the backup pressure regulator at Test Conditions 2, 3 and 6 demonstrates the performance of the backup system. Deleting testing of the backup pressure regulator at Test Condition 5 does not affect any safety systems or the safe operation of the plant and therefore does not involve an unreviewed safety question. Startup Test 22, Pressure Regulator, can therefore be simplified by deleting the Automatic Load Following testing at Test Conditions 3 and 6, the backup pressure regulator testing at Test Condition 5 and the testing at Test Condition 4.