



GULF STATES UTILITIES COMPANY

RIVER BEND STATION POST OFFICE BOX 221 ST. FRANCISVILLE, LOUISIANA 70775
AREA CODE 504 226-6094 345-8651

September 30, 1988
RBG-28911
File Nos. G9.5, G15.4.1

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Gentlemen:

RIVER BEND STATION - UNIT 1
REFER TO: REGION IV
DOCKET NO. 50-458/REPORT 88-18

Pursuant to 10CFR2.201, this letter responds to the Notice of Violation contained in NRC Inspection Report No. 50-458/88-18. The inspection was performed by Messrs. H. F. Bundy and R. V. Azua during the period August 8-12, 1988 of activities authorized by NRC Operating License NP7-47 for River Bend Station - Unit 1.

Gulf States Utilities Company's (GSU) response to Violation 8818-01, "Failure to Properly Evaluate and Document Surveillance Test Results," is provided in the attachment.

Should you have any questions, please contact Mr. Rick J. King at (504) 381-4146.

Sincerely,

J. E. Booker

J. E. Booker
Manager-River Bend Oversight
River Bend Nuclear Group

JEK/AB/ghm
JEB/RJK/PDG/JHM/ch
9/28

Attachment

cc: U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

NRC Resident Inspector
P.O. Box 1051
St. Francisville, LA 70775

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PDR 8540050 KCDU 05000458
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

STATE OF LOUISIANA

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PARISH OF WEST FELICIANA

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In the Matter of

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Docket No. 50-458

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GULF STATES UTILITIES COMPANY

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(River Bend Station

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Unit 1)

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AFFIDAVIT

J. E. Booker, being duly sworn, states that he is Manager-River Bend Oversight for 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; that he has read all of the statements contained in such documents attached thereto and made a part thereof; and that all such statements made and matters set forth therein are true and correct to the best of his knowledge, information and belief.

J. E. Booker
J. E. Booker

Subscribed and sworn to before me, a Notary Public in and for the State and Parish above named, this 30th day of September,
1988.

Claudia J. Hurst
Notary Public in and for
West Feliciana Parish, Louisiana

My Commission is For Life.

Attachment 1

Response to Notice of Violation 50-458/8818-01

Level IV

REFERENCE

Notice of Violation - Letter from L. J. Callan to J. C. Deddens, dated September 1, 1988.

VIOLATION: 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 of 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 10CFR50, 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 of 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-HYVFOG08 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.

REASON FOR THE VIOLATION

GSU has determined that the examples cited as failure to follow procedure were caused by personnel oversight due to inattention to detail. However, these examples are believed to be isolated cases. Further investigation into each example is discussed below.

- A. Since page 24 of 60 for STP 051-4210 is unaccounted for and cannot be duplicated for record purposes, it can only be assumed that the technicians performing the STP were careless in maintaining the documentation.
- B. STP-403-0601, completed 12/18/57 for operability of the standby gas treatment system, was in violation of ADM-0015 Section 8.3.1. The testing engineer identified an unnecessary step in the procedure. He labeled the step N/A, wrote a comment on the data page of the STP and listed these steps as test exceptions. Since these steps were listed in the STP acceptance criteria he was required to either revise the procedure or write a TCN to change the acceptance criteria.
- C. For STP-053-0601 Rev. 2, the data chart was misplaced during transmittal to Permanent Plant File.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

- A. The missing sign-offs were determined to have no impact on the successful completion of the surveillance test procedure (STP). The missing initials were for steps that would have been labeled N/A or steps that notified the operator that the STP was in progress.
- B. A TCN has been issued for STP-403-0601 to reflect the actual testing requirements for the standby gas treatment system. An immediate special test was performed 8/12/58 demonstrating operability of the system and was documented on CR-88-0644.
- C. Again, since missing documents cannot be recreated for record purposes, the missing data was evaluated and determined to be backup data for the completion of the test. The data from this chart was recorded in the contents of the STP.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

STP-053-0601, Rev. 2 will be revised to assure that the data chart is identified as part of the completed data package.

Station Support Procedure (SSP)-1-003, "Records Management/Permanent Plant File," has been reviewed for adequacy. Personnel in permanent plant file (PPF) have been reinstructed on the receipt of STP data packages to assure that verification of numbered pages and attachments is made, and to assure that shift clerks have numbered all attached data sheets. If a discrepancy is noted by PPF, the document package is returned immediately to plant staff for correction.

GSU has begun a random review of STP documentation and completion process. Results will be reported to the Plant Manager by October 31, 1988. Results and recommendations resulting from the review will be evaluated to determine what actions, if any, should be taken. A supplemental response to the NRC will be provided during November, 1988.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

- 1) GSU's review will be completed by October 31, 1988.
- 2) Results of the review will determine any resulting corrective actions and the date in which they will be completed.
- 3) A supplemental response will be provided during November, 1988.
- 4) STP-053-0601 will be revised by January 31, 1989 since this procedure will not be run again until the second refueling outage scheduled in March, 1989.