

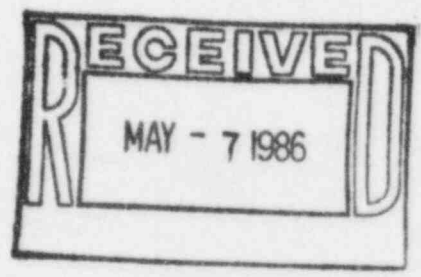


# GULF STATES UTILITIES COMPANY

RIVER BEND STATION    POST OFFICE BOX 220    ST. FRANCISVILLE, LOUISIANA 70775  
AREA CODE 504    635 6094    346-8651

May 2, 1986  
RBG- 23610  
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, TX 76011



Dear Mr. Martin:

River Bend Station - Unit 1  
Refer to: Region IV  
Docket No. 50-458/Report 86-01

As discussed with Mr. J. P. Jaudon of your staff on May 1, 1986, this letter is being provided at this time in response to the Notice of Violation and Notice of Deviation contained in NRC I&E Inspection Report No. 50-458/86-01. The inspection was performed by Mr. H. D. Chaney during the period January 27-31, 1986 of activities authorized by NRC Operating License NPF-47 for River Bend Station Unit No. 1.

Gulf States Utilities Company's (GSU) response to the Notice of Violation 86-01-01, "Failure to Use Offsite Dose Calculation Manual (ODCM) Alarm Setpoints", and Notice of Deviation 86-01-01, "Failure to Maintain Emergency Response Equipment", are provided in the enclosed attachment. This completes GSU's response to the Notice of Violation and Notice of Deviation.

Sincerely,

*W. J. Cahill, Jr.*  
W. J. Cahill, Jr.  
Senior Vice President  
River Bend Nuclear Group

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Attachments

cc: D. D. Chamberlain  
U.S. Nuclear Regulatory Commission  
Region IV Senior Resident Inspector

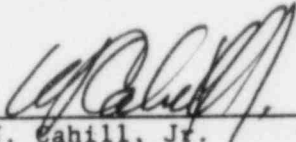
UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

STATE OF LOUISIANA §  
PARISH OF WEST FELICIANA §  
In the Matter of § Docket Nos. 50-458  
GULF STATES UTILITIES COMPANY §

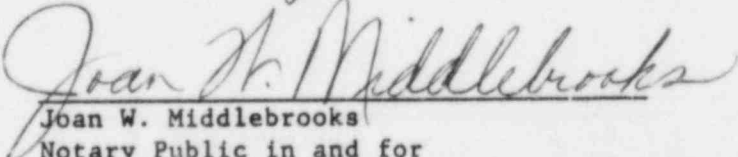
(River Bend Station,  
Unit 1)

AFFIDAVIT

W. J. Cahill, Jr., being duly sworn, states that he is a Senior 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.

  
\_\_\_\_\_  
W. J. Cahill, Jr.

Subscribed and sworn to before me, a Notary Public in and for the State and Parish above named, this 2 day of May, 1986.

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

My Commission is for Life.

ATTACHMENT 1  
RESPONSE TO NOTICE OF VIOLATION 458/8601-01

LEVEL IV

REFERENCE

Notice of Violation - J. E. Gagliardo letter to William J. Cahill, Jr. dated April 1, 1986.

REASON FOR THE VIOLATION

Violation 458/8601-01 identified the failure to use the offsite Dose Calculation Manual (ODCM) established operational alarm setpoints as required by Technical Specifications (TS). An incorrect setpoint was discovered in the Main Plant Exhaust Radiation Monitor 1RMS-RE126 during an NRC inspection conducted on January 27-31, 1986. The second Main Plant Exhaust Radiation Monitor, 1RMS\*RE125, had the correct setpoint per the ODCM methodology and was operable as required by TS Table 3.3.7.11-1.

Stone and Webster Engineering Corporation (SWEC), River Bend Station (RBS) architect engineer of record, performed design basis calculations to establish radiation alarm setpoint limits using regulatory guidance and typical plant data for compliance with 10CFR50, Appendix I criteria. For this application, the ODCM methodology and parameters were established to provide Plant Staff the flexibility to calculate radiation alarm setpoints, using RBS operating plant data. Therefore, the as found setpoints were within the SWEC design basis calculated setpoints.

The initial radiation alarm setpoints were recorded on a SWEC setpoint data sheet based on SWEC design basis calculations. The setpoint data sheet information was incorporated into Engineering Design Coordination Report (E&DCR) No. C40,760D for input in the RM-80 Data Base which is the microprocessor that has direct responsibility for the radiation data gathering and process control required at the instrument.

Prior to Fuel Load, GSU determined setpoints based on the ODCM methodology and parameters. A hardware/software change request was initiated to change the radiation alarm setpoint from the SWEC design basis setpoint to the more conservative ODCM established setpoint. Modification Request (MR) No. 85-0572 was subsequently initiated to perform a detailed engineering review which would include ODCM values into the SWEC setpoint data sheets.

On January 16, 1986 during performance of STP-511-4231, the Instrumentation and Controls (I&C) Technicians observed a loss of the RM-80 Data Base which resulted in a loss of the radiation

## ATTACHMENT 1 (CONT'D.)

alarm setpoint for 1RMS-RE126. The I&C Technicians obtained a copy of the RM-80 Data Base (E&DCR C40,760D) and reloaded the RM-80 data base for 1RMS-RE126 using the RM-23 (a remote control and display unit for the RM-80) in the Main Control Room. The I&C Technicians loaded the less conservative SWEC calculated design basis High Alarm setpoint of  $6.64E-04$  uCi/cc which appeared in E&DCR C40,760D, (MR 85-0572 had not yet been approved to incorporate the ODCM established setpoint of  $2.44E-04$  uCi/cc).

In conclusion, the cause of the subject violation was determined to be an administrative problem in updating the SWEC setpoint data sheets and defining which document should be utilized for inputting radiation alarm setpoints into the RM-80 Data Base.

### CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

Upon discovery of the nonconservative setpoint on January 30, 1986, the conservative ODCM established setpoint was re-entered into 1RMS-RE126. In addition, the other digital radiation monitors that are required by the TS were inspected for setpoint compliance against the ODCM established setpoints.

These initial actions resulted in radiation monitor 1RMS-RE126 being operable with setpoints in compliance with the TS (ODCM established setpoints). Other radiation monitors were found to be in compliance with one exception, 1RMS-RE6A (Radwaste Building Exhaust Ventilation Radiation Monitor). In this case, minimum channels operable requirement was adequately met and the correct setpoint was re-entered into 1RMS-RE6A.

Until each applicable Surveillance Test Procedure (STP) is updated to reference Plant Engineer Procedure (PEP) -0028, "DRMS RM-80 Data Base Management", a memo has been transmitted to I&C Technicians instruction them to contact Technical Staff for the correct ODCM established value when setpoint deviations are identified during performance of the applicable STP's.

### CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Clearer lines of responsibility for calculating effluent monitor setpoints have been established. Radiation Protection will perform the setpoint calculations in accordance with the ODCM methodology and Radiological Programs Procedure (RPP)-0027, "Gaseous Effluent Monitor Setpoint Determination". If the SWEC design basis calculational setpoint limits are challenged, then an MR will be initiated per NPE-3-006, "River Bend Station Design and Modification Request and Control Plan" to determine if the design basis setpoint can be changed.

ATTACHMENT 1 (CONT'D.)

A procedure to provide a timely means of managing the computerized data base in each radiation monitor has been drafted (PEP-0028). This procedure will maintain the complete set of ODCM setpoints and ensure the SWEC design basis setpoints are not exceeded without the appropriate engineering review. PEP-0028 is scheduled to be approved by May 20, 1986.

Applicable STP's will be revised by July 7, 1986, to reference PEP-0028 as the source document for the RM-80 Data Base.

Approval of MR-85-0572 by May 9, 1986, will update the SWEC setpoint data sheets.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

1. The conservative ODCM setpoints have been re-entered into 1RMS-RE126 and 1RMS-RE6A.
2. PEP-0028 will be approved by May 20, 1986.
3. MR-85-0572 will be approved by May 9, 1986.
4. Applicable STP's will be revised by July 7, 1986.

ATTACHMENT 2  
RESPONSE TO NOTICE OF DEVIATION      458/8601-01

REFERENCE

Notice of Deviation - J. E. Gagliardo letter to William J. Cahill, Jr. dated April 1, 1986.

REASON FOR DEVIATION

On January 28, 1986, the NRC inspector identified deviations from Emergency Implementing Procedure (EIP)-2-103, Rev. 1, "Emergency Equipment Inventory", and Section 13.3, Appendix E, "River Bend Station Emergency Equipment Lists", of the Final Safety Analysis Report (FSAR). The NRC Inspector identified that equipment and supplies listed in the FSAR for the Main Control Room (MCR), Operation Support Center (OSC), and the Emergency Operations Facility (EOF) were not maintained as committed. GSU performed a review of the identified differences between FSAR, Appendix E and EIP-2-103. It was determined that the cause of the deviation was an administrative oversight by the reviewers during the preparation of the revision to FSAR Appendix E prior to August 1985. In addition, the identified discrepancies between the EIP "Inventory Lists" and the actual equipment in the Emergency Response Facilities (ERF's), which included an out of date decontamination procedure, were determined to be caused by a failure to perform inventory of the emergency kits in a timely manner following the Practice Emergency Exercise conducted on January 22, 1986.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

A review of FSAR, Appendix E against EIP-2-103 was performed by the Radiological Programs Section and the Emergency Planning Department to identify the required changes to the FSAR. Identified changes to the FSAR have been submitted to the Emergency Planning Department for processing in accordance with EIP-2-101, "Periodic Review of the Emergency Plan".

Emergency kit deficiencies were corrected immediately, and Radiological Programs Procedure (RPP)-0018, "Personnel Decontamination", was replaced with its current revision (Rev. 1, dated August 24, 1985).

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER DEVIATIONS

In accordance with EIP-2-101, a review of the Emergency Plan and EIPs was initiated by the Supervisor - Emergency Planning under the direction of the Facility Review Committee (FRC) to ensure consistency between the FSAR Section 13.3 and the EIP's. All changes resulting from this review are scheduled to be approved by June 15, 1986. This review will be performed at least every twelve months per EIP-2-101.

ATTACHMENT 2 (CONT'D.)

EIP-2-103 and RPP-0049, "Emergency Kit Inventory", will be revised to require an inventory be performed within 48 hours following an Emergency Drill or Exercise and to delete the personnel decontamination procedures from the EOF kit since a controlled copy of RPP-0018 is located in the EOF within close proximity to the decontamination area. EIP-2-103 and RPP-0049 will be revised in advance of the next scheduled emergency drills or exercises but no later than June 15, 1986.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

1. Emergency kit deficiencies have been corrected.
2. The decontamination procedure in the EOF kit has been replaced with the current revision.
3. Changes to the EIPs and FSAR Section 13.3 will be approved by June 15, 1986.