

APPENDIX A
NOTICE OF VIOLATION

Gulf States Utilities
River Bend Station

Docket: 50-458/86-20
License: NPF-47

During an NRC inspection conducted on May 1 through June 15, 1986, two violations of NRC requirements were identified. The violations involved a failure to follow administrative procedures for issuance of temporary change notices (TCNs) and failure to implement procedures to maintain safety system drawing configuration.

In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the violations are listed below:

A. Failure to Follow Administrative Procedures for Issuance of Temporary Change Notices TCNs)

Technical Specifications, paragraph 6.8.1.a. requires that written procedures shall be established, implemented, and maintained for activities covered by Regulatory Guide 1.33, Revision 2, February 1978.

Section 1.d of Regulatory Guide 1.33, Revision 2 requires that administrative procedures be provided for "Procedure Adherence and Temporary Change Method."

Administrative procedure ADM-003; "Development, Control and Use of Procedures", requires the following for the preparation of TCNs to procedures: "If the TCN is being written to a page that has been previously changed by a 'permanent' TCN, the preparer shall use a clean, legible copy of the previous 'permanent' TCN page to markup for the new TCN. The old TCN number and TCN page number shall be lined through, initialed and dated."

Contrary to the above, on May 28, 1986, it was found that TCN 86-0581 prepared on March 27, 1986, for procedure STP-051-4210, "RPS/RHR Reactor Vessel Steam Dome Pressure-High, Monthly Chfunct," did not use copies of previous permanent TCN pages to markup for the new TCN. This resulted in an official work copy of the procedure containing three page eights and three page elevens with a different TCN number on each page.

This is a Severity Level IV violation. (Supplement I.D.)
(458/8620-01)

B. Failure to Control Activities Affecting Quality

Criterion V, Appendix B of 10 CFR Part 50 requires that activities affecting quality be prescribed and accomplished by documented instructions, procedures, and drawings. The licensee's approved QA plan also reflects these requirements.

Contrary to the above, a walkdown of the "C" residual heat removal system on May 22, 1986, revealed the following differences between the actual system configuration and controlling instructions, procedures, and drawings:

- . Five pipe caps, shown as installed on Engineering Piping and Instrument Drawing PID-27-C were not installed.
- . Valve E12*MOV F064C, which was shown closed on Engineering Piping and Instrument Drawing PID-27-7C, was open.
- . Valve E12*VF063C was not locked, although Engineering Piping and Instrument Drawing PID-4-3C showed this valve to be locked.
- . Differences were found between Engineering Piping and Instrument Drawing PID-27-7C and Station Operating Procedure (SOP)-0031 as to which valves were locked in position.

This is a Severity Level IV violation. (Supplement I.D.) (458/8620-02)

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 30th day of July 1986

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