In Reply Refer To: Docket: 50-458/86-06

Gulf States Utilities ATTN: William J. Cahill, Jr. Senior Vice President River Bend Nuclear Group P. O. Box 220 St. Francisville, Louisiana 70775

PDR

Gentlemen:

1

G

Thank you for your letter of July 29, 1986, in response to our letter and Notice of Violation dated June 24, 1986. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,

Original Signed By J. E. Gagliardo

J. E. Gagliardo, Chief Reactor Projects Branch

CC: Gulf States Utilities ATTN: J. E. Booker, Manager-Engineering, Nuclear Fuels & Licensing P. O. Box 2951 Beaumont, Texas 77704 Louisiana State University, Government Documents Department TEOL Louisiana Radiation Control Program Director bcc to DMB (IE01) C:RSB R. Echuland bcc: (cont. next page) RIV: C: ESRO C: RHEITA C:RPB1/ **W**TFWesterman RIreland; df JPJaudon JEGagliardo 8/22/86 8/22/86 84.2/86 8/07/86 8608290006 860822 PDR ADOCK 05000458

Gulf States Utilities

bcc distrib. by RIV: RPB Resident Inspector Section Chief (RPB/A) MIS System RSTS Operator R&SPB RIV File

DRSP R. D. Martin, RA D. Weiss, LFMB (AR-2015) RSB



GULF STATES UTILITIES COMP.

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

346-8651

July 29, 1986 RBG- 24110 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, Texas 76011

Dear Mr. Martin:

River Bend Station-Unit 1 Refer to: Region IV Docket No. 50-458/Report 86-06

This letter responds to the Notice of Violation, "NRC Inspection Report No. 50-458/86-06", transmitted to Gulf States Utilities Company (GSU) in a letter dated June 24, 1986. That letter refers to an inspection performed by Mr. J. R. Boardman during the periods February 3-7 and March 3-7, 1986 of activities authorized by NRC Operating License NPF-47 for River Bend Station.

GSU's response to Notice of Violation 86-06, "Failure to have Certain Maintenance Procedures", is provided in the enclosed attachment. This completes GSU's response to the Notice of Violation.

8608080145 860729 PDR ADOCK 05000458 0 PDR

Sincerely,

. J. Cahill, Jr.

Senior Vice President River Bend Nuclear Group

RRS/ADK/DMR/SRR/kt WJC/ERG

Attachment

IC-166-86

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

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMPLISSION

STATE OF LOUISLANA	5
PARISH OF WEST FELICIANA	5
In the Matter of	
GULF STATES UTILITIES COMPANY	

Docket Nos. 50-458

(River Bend Station, Unit 1)

FFIDAVIT

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.

Subscribed and sworn to before me, a Notary Public in and for the State and Parish above named, this 29 day of Guly, 1986.

Alebrooks

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

My Commission is for Life.

ATTACHMENT

Response to Notice of Violation 50-458/8606-01 Level IV

FAILURE TO HAVE CERTAIN MAINTENANCE PROCEDURES

REFERENCE:

Notice of Violation - Letter to W. J. Cahill, Jr. from J. E. Gagliardo dated June 24, 1986.

Item 1

REASON FOR THE VIOLATION

The NRC inspector identified a failure to have administrative procedures requiring the incorporation of Vendor Technical Information (VTI) in maintenance procedures and the latest available revision of VTI.

Specifically identified during the inspection was vendor specified maintenance for the Reactor Core Isolation Cooling (RCIC) turbine, safety-related Rosemount transmitters, and containment cooling fan motors that had not been incorporated into maintenance procedures.

GSU determined the cause of the subject violation to be not having procedures in place that required the evaluation, review and dissemination of pertinent VTI by a single department.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

Programs existed separately for receipt, review, evaluation and dissemination of VTI. To ensure one central department this activity, River Bend Nuclear Procedure coordinates (RBNP)-0032, "Processing of Vendor Technical Information", was issued on April 28, 1986. This upper tier procedure establishes responsibilities and controls to ensure that the incoming VTI, including changes, receive the appropriate engineering/technical review, evaluation, distribution and incorporation into the appropriate plant procedures. According to this procedure, Nuclear Plant Engineering (NuPE) is responsible to perform evaluation, disposition and dissemination of VTI which includes General Electric's (GE) Service Information Letters (SILs), Service Advice Letters (SALs), and Technical Information Letters (TILs). Subsection procedures, NuPE-AA-65, "Review of Vendor Technical Information", NuPE-AA-66, "GE-NSSS Modification Interface", and NuPE-AA-70, "Processing Vendor Information", have been issued to accomplish the above objective.

Page 2

ATTACHMENT (Cont'd.)

The vendor manual for the RCIC turbine, when compared to maintenance procedures by the NRC inspection team, produced three (3) discrepancies: 1) yearly overspeed testing, for which no maintenance procedure was identified, 2) linkages to be cleaned, lubricated, and inspected quarterly, yet maintenance was doing this yearly, and 3) weekly and monthly preventive maintenance (PM) requirements for which no procedure was identified. Condition Report 86-1109 was issued identifying that there is no evidence of a procedure for performing a yearly overspeed test. The Condition Report requests an engineering review of the descrepancy by 3/29/86. Preventive maintenance task ME3074 has been initiated requesting the linkages to be cleaned, lubricated and inspected on a quarterly frequency. A review of the RCIC PM tasks revealed that selected vendor maintenance recommendations are being performed. Those activities that have not been incorporated into the PM Program have been identified to engineering (CR 86-1109) for evaluation. This evaluation will be completed by 8/29/86.

safety-related Rosemount Vendor specified maintenance for transmitters, that had not been incorporated into procedures, concerned replacement of end cover "O" rings. To ensure Equipment Qualification (EQ) requirements on safety-related Rosemount 1153 and 1154 transmitters were met, Maintenance Work This MWR called for the 22768 was initiated. Request (MWR) replacement of the "O" rings. The work initiated by MWR 22768 completed on April 7, 1986. With the exception of was STP-203-4207, "ECCS/HPCS-Suppression Pool Water Level-High Monthly CHFUNCT, 18 month CHCAL, 18 month LSFT (E22-N055C, E22-N655C)", STP-203-4208, "ECCS/HPCS-Suppression Pool Water Level-High Monthly CHFUNCT, 18 month CHCAL, 18 month LSFT, STP-508-4810, "Isolation (E22-N055G, E22-N6556)", and Actuation-Drywell Pressure High 18 month Response Time (C71-N050, C71-N650) Channels B and C", Instrumentation and Control (I&C) procedures have been revised to clarify the instructions for The replacing the "O" ring when the end covers are removed. excepted STP's are scheduled for revision by July 31, 1986.

Equipment Qualification Maintenance Surveillance Requirement (EQMSR) B-003F-01E has been approved for indentifying the electrical maintenance requirements necessary to maintain the qualified life of containment unit cooler motors. Environmental Qualification PM tasks, having a frequency of one (1) year or less, have been established in accordance with EQMSR B-003F-01E. Tasks having a frequency of greater than one (1) year will be incorporated into the EQ system prior to the task due dates. The EQ task group is incorporating the backlog of EQ tasks with priorities being dictated by due dates to ensure due dates are not missed.

Page 3

ATTACHMENT (Cont'd.)

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

The above corrective actions have been taken to preclude the occurance of further violations.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

MWR No. 22768 was completed on April 7, 1986. RBNP-0032 was issued on April 28, 1986. NuPE-AA-65, NuPE-AA-66 and NuPE-AA-70 were issued on June 6, 1986. The excepted STP's are scheduled for revision by July 31, 1986. The engineering evaluations concerning the PM task for the RCIC turbine will be completed by August 29, 1986, and any required actions as a result of that review will be completed and full compliance achieved by September 30, 1986.

Item 2

REASON FOR THE VIOLATION

The NRC inspector identified a failure of procedures to properly prescribe PM intervals. The cause of the subject violation was determined to be Maintenance procedures not providing adequate instructions when establishing "LATE DATES" for Equipment Qualification (EQ) maintenance activities. This condition resulted from the periodicity tolerances for PM activities being generically adapted to EQ maintenance activities during the initial implementation of the plant EQ program.

THE CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

The periodicity tolerances for EQ activities have been revised. The due dates for scheduled EQ activities are derived by subtracting twenty-five (25) percent from the qualified life of components having a qualified life of less than five (5) years, or by subtracting ten (10) percent from the qualified life of components having a qualified life of greater than five (5) years. The "LATE DATE" for scheduled EQ activities is the qualified life expiration date as indicated by the Equipment Qualification Maintenance and Surveillance Requirements (EQMSR's) issued by Engineering.

Missed EQ maintenance activities are required to be identified on Condition Reports and require an Engineering evaluation (Ref. Administrative Procedure (ADM)-0019, "Initiating and Processing of Condition Reports", and Maintenance Section Procedure (MSP)-0003, "Preventative Maintenance". An engineering evaulation has been performed on missed EQ Preventive Maintenance

ATTACHMENT (Cont'd.)

tasks and no equipment degradations were identified as a result of late or missed EQ maintenance activities.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN TO AVOID FURTHER VIOLATIONS

The revised requirements for establishing and scheduling periodicity tolerances for EQ maintenance activities have been incorporated into MSP-0003.

THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

MSP-0003, Revision 4, was issued on 3/6/86 properly prescribing EQ maintenance intervals. Full compliance with the requirements of MSP-0003, Revision 4, is being achieved.

Item 3

« · ·

1 1 1

REASON FOR THE VIOLATION

The NRC inspector identified that GSU failed to have a program that adequately met ANSI N18.7, Section 5.2.7.1 requirements at the time of the inspection. GSU committed to establish administrative controls to ensure active participation in NPRDS prior to 100% power operations as referenced by letter under item 2.C.15 in the River Bend Station (RBS) Facility Operation License NPF-47. During the NRC inspections (February 3-7 and March 3-7, 1986), RBS's program for implementing root cause analysis of equipment failures was in it's final stages of development. Therefore, the cause of the subject violation was determined to be GSU's interpretation of the requirements for establishing its administrative procedures for the root cause analysis program. Because the NPRDS root cause analysis was not required until achieving 100% power operation, the requirements of ANSI N18.7 for root cause analysis were incorrectly deemed to become effective 100% power operation.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

Root cause analysis of equipment failures is now covered under two separate processes at RBS:

- "Initiating and Processing of Condition Reports" (CRs), ADM-0019
- 2) "Nuclear Plant Reliability Data System (NPRDS) Storage and Retrieval," PEP-0004

Page 5

ATTACHMENT (Cont'd.)

At the time of the NRC inspections, root cause analysis was only required on Nonconformance Reports (NRs) in accordance with ADM-0030, "Reporting and Processing Nonconformances".

The NPRDS Program was fully implemented on April 29, 1986. Under the NPRDS Program Maintenance Work Requests (MWR) generated on NPRDS, reportable systems are reviewed for equipment failures. A NPRDS reportable component or system is one that has been designated reportable by guidelines established for NPRDS by INPO (Institute of Nuclear Power Operations). Safety-related equipment and other equipment that could cause the shutdown or prevent the safe shutdown of the plant are considered reportable under NPRDS guidelines established by INPO. PEP-0004 is the controlling document for the NPRDS Program at RBS. Reportable MWR's are routed to the responsible Technical Staff System Engineer for further investigation of cause of failure. This information is then placed on the NPRDS Component Failure Form and submitted to INPO for trending. General trend reports will be submitted back to GSU for review and additional action as appropriate. ADM-0019 was revised (Rev. 4, Eff. Date 5-16-86) to incorporate the NR program into the CR program. This revision broadened the scope of root cause analysis to include safety-related, QA program applicable, reportable (10 CFR 50.72 and 10 CFR 50.73) to the NRC, or degraded safety CR's. Also, CR's issued since issuance of the operating license (August 29, 1985) were reviewed and, where applicable, a root cause was established for each.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

The CR Program, as governed by ADM-0019, ensures that all safety-related, QA applicable, etc., component failures reported on CR's will receive root cause analysis. The NPRDS Program, as governed by PEP-0004, will ensure that NPRDS Reportable Components will be reviewed for root cause and trended by INPO for GSU review of equipment failures.

DATE WHEN FULL COMPLIANCE WAS ACHIEVED

GSU is currently in compliance with ANSI N18.7, 1976, Section 5.2.7.1. ADM-0019 became effective on May 16, 1986. The NPRDS program was implemented via PEP-0004 on April 29, 1986.