GULF STATES UTILITIES COMPANY

RIVER BEND STATION POST OFFICE BOX 220 ST. FRANCISVILLE, LOUISIANA 70775

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January 28, 1986
RBG- 23047
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 85-73

This letter responds to the Notice of Violation and Notice of Deviation contained in NRC I&E Inspection Report No. 50-458/85-73. The inspection was conducted by Mr. H.D. Chaney during the period October 28 through November 1, 1985 of activities authorized by NRC Operating License NPF-40 for River Bend Station Unit No. 1.

Gulf States Utilities Company's (GSU) response to the Notice of Violation 85-73-01, "Failure to Provide Training" and 85-73-02, "Failure to Maintain Training Records", and Notice of Deviation 85-73-03, "Training of Senior Radiation Protection Technicians", are provided in the enclosed attachments. This completes GSU's response to the Notice of Violation and Notice of Deviation.

Sincerely,

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

WJC/RJK/EMC/je

Attachments

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PDR ADOCK 05000458
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IC-014-86

NOTICE OF VIOLATION
LEVEL IV

REFERENCE

Notice of Violation - J. E. Gagliardo letter to W. J. Cahill, Jr. dated December 30, 1985.

A. FAILURE TO PROVIDE TRAINING

REASON FOR VIOLATION

The NRC inspector determined on October 31, 1985, that eight designated Senior Technicians had not been provided training courses as required by Section I.B.11 of Attachment 3 to RSP-0003.

The Radiation Protection Technician (RPT) On-The-Job-Training (OJT) Training/Qualification Program was phased in during initial approval of Radiation Protection procedures and program development. Qualification cards, standards, and consequently, the RPT Qualification Matrix (Attachment #3 to RSP-0003), were developed in parallel. During the end of the 1st quarter 1985 and thru the 2nd quarter, an emphasis of RPT qualifications for those designated ANSI technicians began. Not all qualification cards, including Item I.B.11, Drywell Entry, were finalized at this time. Consequently, when the Drywell Entry Qualification Card was completed and qualification began, those ANSI RPT's who had completed their qualification earlier were inadvertently overlooked.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

A review of all RPT qualifications has begun. Those qualifications not completed have been identified and progress is being made to complete these qualifications as soon as possible. Emphasis and first priority are the ANSI designated technicians.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATION

The River Bend Station Training Department and the Radiological Programs Department have begun discussions on improving the RPT OJT Program. A review by the Training Department of the Qualification Matrix, Cards, and Standards is scheduled to begin February 1986 and be completed by approximately May 1986. An RPT Foreman will be assigned to coordinate with the Training Department and implement appropriate changes to the OJT Program. This individual will also be directly responsible for ensuring that RPT

qualifications are maintained as outlined in Station Operating Procedures.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

A review of the current matrix to determine completeness of ANSI technician qualifications will be performed. Those qualification cards which are approved will be completed by February 28, 1986.

A revision to RSP-0003, "Personnel Qualification for the Radiation Protection Section", to delete those qualifications already covered by other qualification cards or those that are no longer required. Will be completed by March 21, 1986.

A review by the Training Department of the RPT OJT Qualification Program will be completed by May 2, 1986.

Appropriate changes recommended by the Training Department will be incorporated by September 5, 1986.

The appropriate finalization of RPT's qualification program will be accomplished by January 16, 1987.

B. FAILURE TO MAINTAIN TRAINING RECORDS

REASON FOR VIOLATION

The NRC inspector determined on October 31, 1985 that the Qualification Matrix for eight Senior Radiation Protection Technicians had not been updated for periods in excess of 8 months.

Changes in management responsibility and personnel, coupled with clerical staff changes and lack of training, caused this oversight.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

As stated in Item A, a Radiation Protection Foreman will be assigned to implement the RPT Qualification Program, and this individual will be responsible for ensuring that the Qualification Matrix is maintained as outline in the Station Operating Procedures.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

The PRT Foreman will be directly responsible for ensuring the Qualification Matrix is updated. Appropriate training of clerical staff will avoid further errors associated with the Qualification Matrix.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The Radiation Protection Foreman will be assigned by January 31, 1986. The appropriate clerical staff will be fully indoctrinated by February 14, 1986.

Attachment 2

RBG-23047
January 28, 1986

NOTICE OF DEVIATION

REFERENCE:

Notice of Deviation - J. E. Gagliardo letter to W. J. Cahill, Jr. dated December 30, 1985.

IDENTIFIED DEVIATION

The NRC Inspector determined on October 31, 1985 that only one out of eight Senior Radiation Protection Technicians had received the specified training.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

An initial review of the ANSI Technicians qualification was performed by the Radiation Protection Group. It was determined, on an individual basis, that prior experience and the completion of a Radiation Protection on-the-job training system qualification card was sufficient to meet the intent of the FSAR with regard to Systems Training. No waiver of training was completed during this initial review. Consequently no documentation of this evaluation appears in the qualification folder. The Radiation Protection Group will perform another evaluation of the ANSI Technicians experience and based on this review will either a) schedule the Technicians for Systems Training or b) complete a waiver of training as described in RBS FSAR, Section 13.2.1 and submit the waiver to the training file.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER DEVIATIONS

The procedure which provides guidelines for Radiation Protection training, RSP-0003, will be revised to incorporate the use of the waiver form to document any waiver of training based on experience.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The review of Radiation Protection Technicians prior experience and the applicable waiver will be completed by March 7, 1986. Those ANSI Radiation Protection Technicians who do not have sufficient prior BWR experience to fulfill the requirements will be scheduled and complete the General Systems Training before December 31, 1986. RSP-0003 will be revised by March 21, 1986.

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 28th day of January, 1986.

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

My Commission is for Life.