In Reply Refer To: Docket: 50-458/86-27

Gulf States Utilities ATTN: Mr. James C. Deddens Senior Vice President, (RBNG) Nuclear Licensing P. O. Box 220 St. Francisville, Louisiana 70775

Gentlemen:

Thank you for your letters, dated December 1, 1986, and January 28, 1987, in response to our letters, dated October 24, 1986, and December 22, 1986. We have no further questions at this time and will review your corrective action during a future inspection.

Sincerely,

**Original** Signed By J. E. Gagliardo

J. E. Gagliardo, Chief Reactor Projects Branch

cc: Gulf States Utilities ATTN: J. E. Booker, Manager-River Bend Oversight P. C. Box 2951 Beaumont, Texas 77704

Louisiana State University, Government Documents Department

Louisiana Radiation Control Program Director

bcc to DMB (IE01)

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

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DRSP R. D. Martin, RA D. Weiss, RM/ALF RSB Project Inspector R. Hall

C: RPB

2/4/87

JEGagliardo

PI 8/205 JPJaudon WRBennett:cs 2/3/87

PDR

C: RPB/A Sta 2/3/87

**RIV** File



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

> January 21, 1987 RBG- 25254 File Nos. G9.5, G15.4.1

Nuclear Regulatory Commission Document Control Desk Washington, DC 20555

Gentlemen:

River Bend Station - Unit 1 Refer to: Region IV Docket No. 50-458/Report 86-27

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HOLDE SPP.

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This supplemental letter responds to the Notice of Violation contained in NRC Inspection Report No. 50-458/86-27. The inspection was performed by Messrs. D. D. Chamberlain, W. B. Jones and W. R. Bennett during the period August 1 through September 15, 1986 of activities authorized by NRC Operating License NPF-47 for River Bend Station.

Gulf States Utilities Company's (GSU) supplemental response to Notice of Violation 8627-02, "Failure to Follow a Surveillance Test Package", is provided in the enclosed attachment pursuant to 10CFR2.201 and 10CFR50.4. This completes GSU's response to the Notice of Violation.

Sincerely,

8. C. Deddens Senior Vice President River Eend Nuclear Group

JCD/ERG/ 22

Attachment

cc: Mr. Robert D. Martin, Regional Administrator U.S. Nuclear Regulatory Commission Region IV 611 Ryan Plaza Drive, Suite 1000 Arlington, TX 76011

River Bend Resident Inspector

IC-87 027

## UNITED STATES OF AMERICA

### NUCLEAR REGULATORY COMMISSION

STATE OF LOUISIANA \*
PARISH OF WEST FELICIANA \*
In the Matter of \*
GUF STATES UTILITIES COMPANY \*

Docket Nos. 50-458

(River Bend Station, Unit 1)

1

## AFFIDAVIT

J. C. Deddens, 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.

ddens

Subscribed and sworn to before me, a Notary Public in and for the State and and Parish above named, this 25 day of January, 1987.

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

My Commission is for Life.

## RESPONSE TO NOTICE OF VIOLATION 50-458/8627-02 LEVEL IV

## REFERENCE

Notice of Violation - J. E. Gagliardo letter to W. J. Cahill, Jr. dated October 24, 1986.

Request for additional information - J. E. Gagliardo letter to W. J. Cahill, Jr. dated December 22, 1986.

#### FAILURE TO FOLLOW A SURVEILLANCE TEST PACKAGE

### REASON FOR THE VIOLATION

When performing Surveillance Test Procedure (STP)-203-1102, "Battery Weekly Surveillance Test for 1E22\*S001BAT", the procedure requires the technician to obtain and record the pilot cell numbers using the previous performance of STP-203-1302, "1E22\*S001BAT Quarterly | Surveillance Test". The pilot cells are defined as the cells having the lowest specific gravities. When obtaining the pilot cell numbers the performer is required to identify and select the lowest cell readings | from a four (4) page tabulation of values. During the performance of | the quarterly test on August 12, 1986, maintenance personnel inadvertently recorded the cell number having the lowest specific gravity (cell #37) and the cell with the third lowest specific gravity (cell #52). This personnel oversight resulted in a deviation from the procedural requirements of STP-203-1102.

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

Immediately upon discovering the error of identifying the incorrect pilot cell number, a conservative approach was taken, and the batteries were removed from service. STP-203-1102 was rerun on September 12, 1986 with satisfactory results.

Following the performance of STP-203-1102 on September 12, 1986, the data recorded by the procedure since the last performance of STP-203-1302 (Quarterly Test), was reviewed to ensure compliance with River Bend Technical Specifications and IEEE 450-1975. The review concluded that the data recorded met the intent of IEEE 450-1975 and was within the limits specified by the Technical Specifications.

While performing the history review of the data recorded during the performances of STP-203-1102, it was discovered that STP-203-1102 performed on August 18, 1986 also failed to identify the correct pilot cell numbers. This was caused by personnel not having available the latest performance of STP-203-1302 (Quarterly Test) when obtaining the pilot cell numbers.

## ATTACHMENT (Cont'd.)

To ensure these problems are not indicative of a generic problem, the Maintenance Department conducted a review of other Maintenance Surveillance Test Procedures that require data to be transferred from another source. The review identified some Radiation Monitoring Calibration Surveillance Procedures and Instrumentation Response Time Procedures as also requiring the transfer of data.

It has been concluded that the Radiation Monitoring Surveillance Procedures provide sufficient methods and controls to preclude the transfer of incorrect data. These procedures require Radiation Protection to provide Maintenance with background radiation readings and source count values. Unlike the Battery Surveillance Procedures, the Radiation Monitoring Procedures involve a separate discipline for the purpose of verifying the data, and the values being transferred are readily identifiable.

On November 7, 1986, CR 86-1708 was initiated identifying Instrumentation Response Time Procedures having incorrect data transferred during their initial performance. An Engineering investigation of this condition revealed no response time was found to exceed the Technical Specification response time acceptance criteria. The CR identified programmatic problems in a number of areas which contributed to the incorrect data being transferred.

As documented on Condition Report (CR) 86-1809 during a review of leak rate data from STP-208-3600, "Main Steam Positive Leakage Control/Penetration Valve Leakage Control System Leakage Rate Test", it was discovered that the wrong value was used to compile Division I Main Steam Positive Leakage Control System Leakage Rate. Two tests were performed to determine inboard main steam isolation valve B21\*A0VF022C inleakage rate. One test was performed on November 11, 1986 and indicated 174.45 standard cubic feet per hour (SCFH), while another test performed on November 12, 1986 indicated 201.4 SCFH. The value recorded on test dated November 11, 1986 was used to determine total inleakage rate. However the test dated November 12, 1986 should have been used because it was the last test performed on this valve. Data transfer was determined to be the cause.

Leak rate data was analyzed by a number of different methods. In each approach, leakage of B21\*AOVF022C satisfied Technical Specification criteria. New STP-208-3600 data is being compiled and will be completed by February 16, 1987.

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

Temporary Change Notices (TCNs) 86-1416, 86-1418 and 86-1419 have been issued against procedures STP-305-1100, STP-305-1101, STP-203-1102 and PMP-1036, respectively, to require independent verification for ensuring that the cells with the lowest specific gravities are used as pilot cells.

## ATTACHMENT (Cont'd.)

To ensure the latest Quarterly Battery Test is available when obtaining pilot cell numbers, the Electrical Maintenance Supervisor will maintain the latest Quarterly Battery Test on file until the next performance of the test. Upon completion of the next scheduled quarterly battery test of the results of the previous quarterly test will be transmitted to the Permanent Plant File (PPF).

Remaining STP's will be reviewed for possible transfer of data concerns. These reviews will be documented, problems identified, corrections made and procedures revised by July 1, 1987, to prevent recurrence of data transfer errors.

## DATE FULL COMPLIANCE WILL BE ACHIEVED

The affected Battery Surveillance Test Procedures have been revised.

Remaining procedures will be reviewed and changes issued by July 1, | 1987.

The new STP-208-3600 data will be compiled by February 16, 1987.



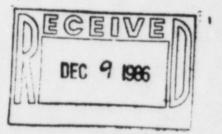
GULF STATES UTILITIES COMP

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

> December 1, 1986 RBG- 24898 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 86-27

This letter responds to the Notice of Violations contained in NRC Inspection Report No. 50-458/86-27. The inspection was performed by Messrs. D. D. Chamberlain, W. B. Jones and W. R. Bennett during the period August 1 through September 15, 1986 of activities authorized by NRC Operating License NPF-47 for River Bend Station.

Gulf States Utilities Company's (GSU) response to Notice of Violation 8627-01, "Failure to Meet Electrical Specification Requirements", 8627-02, "Failure to Follow a Surveillance Test Package", are provided in the enclosed attachment. This completes GSU's response to the Notice of Violations.

Sincerely,

W. J. Cahill, Jr. Senior Vice President 2612170218 6PP. River Bend Nuclear Group

RRS/je WJC/GKH

Attachments

IC-298 86

## UNITED STATES OF AMERICA HUCLEAR REGULATORY COMPLISSION

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

Docket Nos. 50-458

(River Bend Station, Unit 1)

. 1 ", 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.

J/Cahill,

11.1

Subscribed and sworn to before me, a Notary Public in and for the State and Parish above named, this  $\int dt day of fictorially, 1986$ .

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

My Commission is for Life.

# RESPONSE TO NOTICE OF VIOLATION 50-458/8627-01 LEVEL IV

### REFERENCE

. . .. .

Notice of Violation - J. E. Gagliardo letter to W. J. Cahill, Jr. dated October 24, 1986

# FAILURE TO MEET ELECTRICAL SPECIFICATION REQUIREMENTS

# REASON FOR THE VIOLATION

During a Battery System Walkdown, it was noted by the Nuclear Regulatory Commission (NRC) Senior Resident Inspector (SRI) that the positive leads to the Division III Batteries contained splices which were not made in a pull box. This is a nonconformance to Stone & Webster Engineering Corporation (SWEC) Electrical Specification 248.000. In addition, the SRI expressed concerns about the cable training and support.

These splices were made by the construction forces during the implementation of a design change initiated by Engineering and Design Coordination Report (E&DCR) P22099. This design change required cable, 1CSHNOK601, a three (3) conductor number two (#2) cable, be terminated with all three conductors to the positive battery post and a new cable, 1CSHNOK608, be installed to the negative battery post. The previous design was for 1CSHNOK601 to be terminated at the battery, 1E22\*S001BAT, with one conductor at the positive post, one conductor at the negative post and one conductor spared. The design change did not specify a splice to allows splicing of cable as long as the splices are in junction boxes, pull boxes, in conduit fittings in conduit with single circuits or within equipment enclosures.

There were no nonconformances identified during this modification, therefore, it is presumed that one of the following occurred:

- The construction forces interpreted the specification requirements to consider the battery room as an enclosure for the batteries (i.e., an equipment enclosure), or
- The construction forces overlooked the restrictions for making splices in this case.

The Quality Control inspector for this installation and the craftsman are no longer employed at River Bend Station. GSU's conclusion upon investigating this condition is that the root cause is indeterminate.

## ATTACHMENT 1 (cont'd)

# CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

Condition Report (CR) 86-1383 was initiated to provide investigation and corrective action for this problem. Stone & Webster Engineering's evaluation has shown that the Division III Battery cable splice was not in conformance with Specification 248.000. The splice will be enclosed in accordance with the intent of Electrical Specification 248.000 via Modification Request (MR) 86-1752. This MR also addresses cable training and supports. Further inspections were performed by the Design System Engineer on Divisions I and II battery connections and no similar nonconformances to Specification 248.000 were found.

An independent review and reinspection of the Quality Control Inspector's work was previously performed by GSU Quality Assurance (QA) Department in September, 1985. This review revealed no problems with the inspector's performance. An informal walkdown of selected electrical equipment enclosures conducted during October and November, 1985 by GSU QA Department did not identify any similar Electrical Specification nonconformances. The GSU QA Department coordinated an additional walkdown of areas that contain safety-related power cables in free air. No additional cable splice violations were found. Based on the above mentioned reviews and walkdowns, it has been concluded that the subject of concern is an isolated case.

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

No further corrective action is necessary.

. . .. .

## DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

With the closure of CR 86-1383 and the implementation of MR 86-1752, full compliance will be achieved during the first quarter of 1987.

## RESPONSE TO NOTICE OF VIOLATION 50-458/8627-02 LEVEL IV

## REFERENCE

. . . . .

Notice of Violation - J. E. Gagliardo letter to W. J. Cahill, Jr. dated October 24, 1986.

## FAILURE TO FOLLOW A SURVEILLANCE TEST PACKAGE

### REASON FOR THE VIOLATION

When performing Surveillance Test Procedure (STP)-203-1102, "Battery Weekly Surveillance Test for 1E22\*S001BAT", the procedure requires the technician to obtain and record the pilot cell numbers using the previous performance of STP-203-1320, "1E22\*S001BAT Quarterly Surveillance Test". The pilot cells are defined as the cells having the lowest specific gravities. When obtaining the pilot cell numbers following the performance of the quarterly test on August 12, 1986, maintenance personnel inadvertently recorded the cell number having the lowest specific gravity (cell #37) and the cell with the third lowest specific gravity (cell #52). This personnel oversight resulted in a deviation of the procedural requirements of STP-203-1102.

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

Immediately upon discovering the error of identifying the incorrect pilot cell number, a conservative approach was taken and the batteries were removed from service. STP-203-1102 was rerun on September 12, 1986 with satisfactory results.

Following the performance of STP-203-1102 on September 12, 1986, the data recorded by the procedure since the last performance of STP-203-1320 (Quarterly Test), was reviewed to ensure compliance with River Bend Technical Specifications and IEEE 450-1975. The review concluded that the data recorded met the intent of IEEE 450-1975 and was within the limits specified by the Technical Specifications.

While performing the history review of the data recorded during the performances of STP-203-1102, it was discovered that STP-203-1102 performed on August 18, 1986 also failed to identify the correct pilot cell numbers. This was caused by personnel not having available the latest performance of STP-203-1302 (Quarterly Test) when obtaining the pilot cell numbers.

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

Temporary Change Notice: (TCNs) 86-1416, 86-1417, 86-1418 and 86-1419 have been issued against procedures STP-305-1100,

## ATTACHMENT 2 (cont'd.)

STP-305-1101, STP-203-1102 and PMP-1036 respectively to require independent verification for ensuring that the cells with the lowest specific gravities are used as pilot cells.

To ensure the latest Quarterly Battery Test is available when obtaining pilot cell numbers, the Electrical Maintenance Supervisor will maintain the latest Quarterly Battery Test on file until the next performance of the test. Upon completion of the next scheduled quarterly battery test the results of the previous quarterly test will be transmitted to the Permanent Plant File (PPF).

## DATE FULL COMPLIANCE WILL BE ACHIEVED

. . . . .

The affected procedures have been revised.