#### APPENDIX B

#### U.S. NUCLEAR REGULATORY COMMISSION REGION IV

NRC Inspection	Report: 50-458/86-39	License:	NPF-47
Docket: 50-45	8		
P. (	f States Utilities O. Box 220 Francisville, Louisiana 707	75	
Facility Name:	River Bend Station		
Inspection At:	River Bend Site, St. Franci	sville, Louisiana	
Inspection Con	ducted: December 8-12, 1986,	and January 12-16, 1	987
Inspectors:	W. R. Bennett, Project Engin Section A, Reactor Project		2/4/87 Date
for	H. E./Skow, Project Engineer Section(A, Reactor Project	, Projects s Branch	2/6/87 Date
for	R. B. Vickrey, Reactor Inspersection, Reactor Safety Br	ctor, Operations	2/6/87 Date
Approved:	F. H. Jaudon, Chief, Project Reactor Projects Branch	s Section A	2/6/87 Date
	D. M. Hunnicutt, Chief, Open	ations Section	2/6/87 Date

D. M. Hunnicutt, Chief, Operations Section Reactor Safety Branch

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## Inspection Summary

Inspection Conducted December 8-12, 1986, and January 12-16, 1987 (Report 50-458/86-39)

Areas Inspected: Routine, unannounced inspection of Surveillance Procedures and Records, LER follow up, and follow up of previously identified inspection findings.

Results: Within the three areas inspected, two violations were identified (paragraph 4).

#### DETAILS

## 1. Persons Contacted

- \*J. C. Deddens, Senior Vice President
- \*P. D. Graham, Assistant Plant Manager, Operations
- \*M. F. Sankovich, Manager, Engineering
- \*R. L. Spence, Resident QC Manager
- \*V. J. Normand, Supervisor, Administrative Services
- \*R. R. Smith, Licensing Engineer \*J. L. Burton, ISEG Supervisor
- \*R. B. Stafford, Director, Operations Quality Assurance (QA)
- \*D. B. Reynolds, Supervisor, Administrative Support
- \*E. R. Oswood, Senior QA Engineer
- \*D. E. Hoeppner, Assistant to Director Design Engineer
- \*J. W. Leavines, Director, Field Engineering
- \*R. W. Frayer, Projects Supervisor
- \*R. J. King, Supervisor, Nuclear Licensing
- \*J. H. McQuirter, Licensing Engineer
- \*K. E. Suhrke, Manager, Project Management
- \*L. R. Thompson, M&TE Supervisor
- \*E. M. Cargill, Supervisor, Rod Programs
- \*G. R. Kimmell, Supervisor, Operations QA
- \*A. D. Kowalczuk, Assistant Plant Manager, Plant Staff
- \*T. F. Plunkett, Plant Manager
- \*J. E. Booker, Manager, Riverbend Oversight
- \*D. R. Gipson, Director, Quality Services
- \*W. H. Odell, Manager, Administration
- \*J. W. Cook, Lead Environmental Analyst
  \*D. R. Derbonne, General Maintenance Supervisor
- \*E. R. Grant, Director of Licensing
- \*T. L. Crouse, QA Manager
- \*L. G. Johnson, (Cajun Electric)
- \*J. V. Connor, Supervisor, Environmental Services
- \*W. F. Eisele, Radiological Health Supervisor
- \*M. A. Harrington, Senior Environmental Analyst
- \*D. E. Boyer, Environmental Analyst
- J. E. McWhorter, QA Engineer
- A. O. Fredieu, Assistant Operations Supervisor
- A. F. Harvey, Coordinator, Nuclear Document Control
- R. P. Murray, QA Engineer (Stone and Webster Eng. Corp.)

The NRC inspectors also contacted other licensee personnel including administrative, maintenance, operations, and quality assurance personnel.

<sup>\*</sup>Denotes those attending exit interviews conducted on December 12, 1986, and/or January 16, 1987.

## 2. Licensee Action on Previous Inspection Findings

(Closed) Violation (458/8616-01), Failure to Have Adequate Procedures. This item concerned setting up new torque wrench controls without approved procedures. The torque wrenches were placed under ADM-0029 control by the licensee at the time the violation was first pointed out to the licensee. Torque wrenches have remained under ADM-0029 control since that time. The licensee stated that they intended to obtain a new torque wrench testing device. When it is ready for service, a new procedure will be used to control torque wrenches. The new procedure, GMP-0092, has been prepared and reviewed by the licensee, but it will not be issued until the new testing device is available and ready for service. This item is closed.

(Closed) Violation (458/8616-02), Failure to Follow Procedures. This item concerned failure to incorporate document revisions promptly into manuals at the Emergency Operations Facility. The NRC inspector checked approximately 40 recently issued documents against indexes and found no errors. This item is closed.

(Closed) Violation (458/8616-03), Failure to Follow Procedures. This item concerned the modified IS-217 report, an index of drawing changes. Procedure SSP-1-004 has been revised to include specific instructions for the modified IS-217 report. This item is closed.

(Closed) Open Item (458/8633-02), Followup of Quality Assurance Finding Reports (QAFRs) in Audit PSUS/PFPP-85/09. Five QAFRs were noted in the open item that were open for approximately a year after the audit. The five QAFRs were P-85-10-45D, -49D, -50D, -51D, and -52D. The NRC inspector continued his review of the audit package and found that QAFR extensions were not well documented. There was little documentation, in some cases, of the reason for the request or that the request was actually granted by an appropriate authority. Some extensions did not even appear to have been requested. This appeared to have been contrary to procedure QAP-1.15, Revision 1, dated July 31, 1986. The NRC inspector discussed this situation with the licensee. The licensee stated that they had recognized this problem in documentation with QAFR extensions and had revised QAP-1.15 to correct the documentation. The QAFRs being reviewed in this case were extended prior to the procedure change. During the discussions, the licensee stated that QFAR extensions were requested and granted but that the documentation had not been retained. The NRC inspector then reviewed three recent audit packages to look for QAFRs that may have been extended since August 1986. Extensions appeared to have been documented in accordance with the revision to QAP-1.15. Because the licensee recognized the problem of QAFR extension documentation and took corrective action, they are not being cited for an apparent violation. It is the opinion of the NRC inspector that had QAP-1.15, Revision 1, been in effect at the time the QAFRs were active, documentation would have been complete. The Audit package did contain other documentation which indicated that the licensee was continuing to work on resolution to the QAFRs. Once the QAFRs

were resolved they did remain open pending inspection follow up by QA. In some cases, the QA follow up was performed by a subsequent audit in the same area. This item is closed.

(Closed) Violation (458/8574-01), Failure to Have Required Documents in Quality Data Packages. Corrective action consisted of an audit of all ninety Quality Data Packages shipped to the site directly from General Electric (GE) Suppliers. Three of these packages were not located on site but have been transmitted by GE and have been received at the site. In addition, one hundred other GE packages were audited with no discrepancies found. The NRC inspectors reviewed this audit activity and found no problems. This item is closed.

## 3. Licensee Event Report (LER) Review

The NRC inspectors reviewed LERs for compliance with requirements established in 10 CFR 50.73, Licensee Event Report System. Specifically the LERs were reiewed for accuracy and clarity of the event description; the cause of each component failure, system failure, or personnel error; the failure mode and the effect each component had on plant operation; operator actions that affected the course of the event; and the corrective actions taken to prevent reoccurrence of the event. The NRC inspectors reviewed all LERs which involved jumpers, or misplaced or shorted leads during the performance of surveillance test procedures (STPs).

The licensee has performed a walkthrough of all surveillance test procedures. Whenever possible jumper connection points and jumpers have been changed to utilize banana plugs and clips. The STP review also identified potential problem areas caused by connection points being relatively inaccessible. Wherever possible, the licensee changed connection points to more accessible areas. Wherever the connection points could not be improved, modification requests (MRs) were submitted. MRs which were considered priority have been evaluated by the engineering Department. In addition the NRC inspector reviewed River Bend Procedure GMP-0042, "Circuit Testing and Lifted Leads and Jumpers," Revision 4, dated September 16, 1986, and interviewed several technicians concerning the use of this procedure. The following LERs were reviewed:

LER No.	<u>Title</u>
85-010	Incorrectly Wired Terminations in the Standby Liquid Control System
85-016	Jumper Slipped Off Terminal
85-019	Jumper Came Loose
85-020	Jumper Accidentally Grounded
85-022	Jumper Installed on Wrong Relay Contacts

85-023	Jumper Slipped Off a Relay Terminal
85-053	Cable Disconnected
85-055	Short-Circuited Test Equipment
85-056	Incorrect Installation of Temporary Alteration
85-063	Lead Shorted During Relanding
86-003	Unauthorized Jumper in Control Room Panel
86-010	Grounded Test Jumper
86-025	Shorted Jumper
86-063	Shorted Lead

The above listed LERs are closed.

# 4. Surveillance Procedures and Records

The purpose of this portion of the inspection was to ascertain whether the surveillance of safety-related systems and components is being conducted in accordance with approved procedures as required by the Technical Specifications (TS). The NRC inspectors reviewed the last eight performances of the following procedures:

Procedure	<u>Title</u>
STP-505-4506	RPS/Control Rod Block - APRM Weekly CHFUNCT, Weekly CHCAL and 18-Month LSFT (CSI*K605F)
STP-309-0201	Diesel Generator Division I Operability Test
STP-207-4550	RCS - Identified and Unidentified Leakage Detection System - Drywell and Containment Equipment Drain and Drywell, Pedestal and Containment Floor Drain Sump Flow Monitoring Monthly CHFUNCT
STP-511-4509	RMS - Main Control Room Ventilation Radiation Monitor Local Intake - Monthly CHFUNCT (IRMS*RE13A)
STP-251-3101	Fire Protection Water System Minimum Water Volume Test
STP-051-4232	ECCS/HPCS - Reactor Vessel Water Level - Low Low - Level 2 Monthly CHFUNCT, 18-Month CHCAL, 18 Month LSFT (B21-N073G; B21-N673G)

STP-051-4234	ECCS/HPCS - Reactor Vessel Water Level - Low Low - Level 2 and High Level 8 Monthly CHFUNCT, 18-Month CHCAL, 18-Month LSFT (B21-N073L; B21-N673L; and B21-N674L)
STP-051-4211	RPS/RHR Reactor Vessel Steam Dome Pressure - High Monthly CHFUNCT, 18-Month CHCAL, and 18-Month LSFT (B21-N078C; B21-N678C; and B21-N679C)
STP-051-4223	ECCS/RCIC - Reactor Vessel Water Level - Low Low Low, Level 1; Low Low, Level 2; Monthly CHFUNCT, 18-Month CHCAL, 18 Month LSFT (B21-N691B; B21-N692B; and B21-623B)
STP-051-4281	Primary Containment Ventilation System, Unit Cooler "A" -Containment to Annulus Differential Pressure High, Monthly CHFUNCT, 18 Month CHCAL, 18-Month LSFT (1HVR*PDT60C, 1HVR*ESX60C, 1HVR*ESY60C)
STP-051-4282	Primary Containment Ventilation System, Unit Cooler "B" - Containment to Annulus Differential Pressure High, Monthly CHFUNCT, 18-Month CHCAL, 18-Month LSFT (1HVR*PDT50D, 1HVR*ESX60D, 1HVR*ESY60D)
STP-201-3301	SLC Pump and Discharge Check Valve Operability Test
STP-204-3301	LPCI (RHR) Pump and Valve Operability Test
STP-000-3400	Fire Door Release Mechanism Visual Inspection
STP-000-3605	Fire Door Release Mechanism Functional Test

Review of these procedures showed that all procedures met TS requirements and all values were within acceptable limits. All procedures had been performed within the required time frame with the exception of STP 505-4506 which had not been performed between October 24 and November 16. A limiting Condition for Operation was properly initiated for the time the STP was not performed. Step 7.1.47 of STP 505-4506, performed on November 16, 1986, was not performed in accordance with the procedure in that the required jumper was not connected to the specified pins but was instead connected to an alternate location not specified in the procedure. No procedure change was issued to perform this action. Step 7.1.33.3 of STP 051-4234, Revision 5, performed on May 6 and June 4, 1986, was improperly designated as not applicable. Step 7.1.28.3 of STP 051-4234, Revision 6 (step is the same as above but renumbered in the revision) performed on September 5, 1986, was initialed as performed even though plant conditions indicated that the step could not have been completed. The failure to follow procedures as denoted in the above examples is an apparent violation (458/8639-01). The NRC inspectors noted that STP 051-4234, Revision 5, performed on August 6, 1986, contained a comment that step 7.1.33.3 could not be completed unless reactor water level was high. The NRC inspectors questioned why this comment was not incorporated into the procedure during Revision 6. During investigation, the NRC inspectors determined that Revision 6 to STP 051-4234 was issued on August 4, 1986, prior to performance of STP 051-4234, Revision 5 on August 6, 1986. This failure to utilize the proper revision to a surveillance test procedure is an apparent violation (458/8639-02). The comment was incorporated into the procedure via TCN 86-1939 on December 14, 1986.

The NRC inspectors noted that numerous typographical errors still existed in the surveillance procedures. Comments to correct these typographical errors as well as suggested methods to improve the procedures had been made by technicians in the comments section of the procedure. Interviews with technicians and sampling of procedure changes in progress showed that most of these comments were not incorporated into the procedures. The licensee has instituted a program to ensure that procedure comments generated in the field are directed to the procedures coordinator for evaluation and to review sister procedures for consistency and incorporation of comments and changes. The effectiveness of this program will be evaluated in a future inspection and is considered an open item (458/8639-03).

Review of STP 201-0301 showed that it had taken over 10 months in three different instances for the completed procedure to be reviewed by the system engineer. The NRC inspectors were informed that the procedures had been in the system engineers desk for that period of time and that they had identified the problem previous to the inspection. Since the licensee had identified this problem, no NRC violation will be issued. The licensee discussed their corrective action to prevent similar occurrences in the future. The NRC inspectors considered the licensee's actions to be satisfactory.

The NRC inspectors observed the complete performance of three STPs and the partial performance of several others. All procedures were performed as written, and in a controlled, professional manner. All administrative procedures for performance of test procedures were observed to be followed. Control room personnel were aware of all surveillances being performed and took appropriate action to preclude any problems occurring due to surveillance performance.

No additional violations or deviations were identified in this portion of the inspection.

#### 5. Exit Interviews

Exit interviews were held on December 12, 1986, and January 16, 1987, with those personnel denoted in paragraph 1 of this report. The NRC senior resident inspector and resident inspector also attended these meetings. At the meetings, the scope of the inspection and findings were summarized.