



**GULF STATES UTILITIES COMPANY**

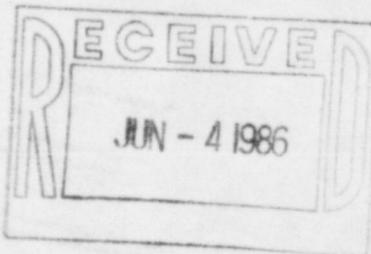
RIVER BEND STATION      POST OFFICE BOX 220      ST. FRANCISVILLE, LOUISIANA 70775  
AREA CODE 504      635-6094      346-8651

May 30, 1986  
RBG- 23800  
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 86-16



This letter responds to the Notice of Violation contained in NRC I&E Inspection Report No. 50-458/86-16. The inspection was performed by Mr. Michael E. Skow during the period March 31 through April 4, 1986 of activities authorized by NRC Operating License NPF-47 for River Bend Station - Unit 1.

Gulf States Utilities Company's (GSU) response to Notice of Violation 86-16-01, "Failure to Have Adequate Procedures", 86-16-02, "Failure to Follow Procedures", and 86-16-03, "Failure to Follow Procedures", are provided in the enclosed attachment. This completes GSU's response to the Notice of Violation.

Sincerely,

A handwritten signature in black ink, appearing to read "W.J. Cahill, Jr."  
W. J. Cahill, Jr.  
Senior Vice President  
River Bend Nuclear Group

erg/RS DRD  
WJC/ERG/RRS/ADK/DPR/je  
cjt

Attachments

8606190288 860613  
PDR ADOCK 05000458  
Q PDR

TC-108/86

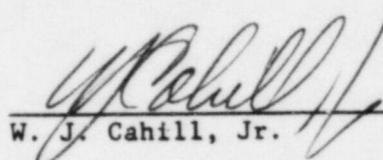
UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

STATE OF LOUISIANA                                 \$  
PARISH OF WEST FELICIANA                             \$  
In the Matter of                                     \$                     Docket Nos. 50-458  
GULF STATES UTILITIES COMPANY                         \$

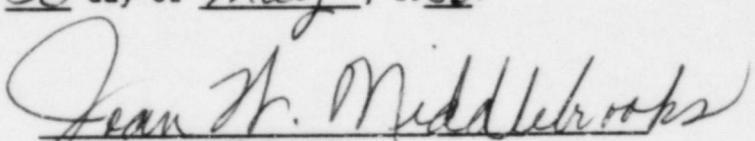
(River Bend Station,  
Unit 1)

**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 30 day of May, 1986.

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

My Commission is for Life.

ATTACHMENT 1

RESPONSE TO NOTICE OF VIOLATION 50-458/8616-01

LEVEL IV

Reference

Notice of Violation - J. E. Gagliardo to W. J. Cahill, Jr. dated May 1, 1986.

A. FAILURE TO HAVE ADEQUATE PROCEDURES

REASON FOR THE VIOLATION

On March 25, 1986, in Memorandum No. PMG-M-86-62, the Plant Staff Maintenance Department removed torque wrenches from the controls of Administrative Procedure ADM-0029, "Control of Measuring and Test Equipment (M&TE)", and provided new instructions for controlling torque wrenches. These program changes were made to provide controls for more reliable torque wrench calibrations by requiring the torque wrenches to have a calibration check before and after each use on plant equipment. The new program also expedited the process of issuing torque wrenches to Maintenance personnel. The M&TE device used to check the torque wrench calibrations remained under the control of ADM-0029. The new instructions also continued the use of M&TE Tracking Cards, as required by ADM-0029. Although the memorandum, issued on March 25, 1986, did establish controls for using torque wrenches at River Bend Station, the failure to implement an approved procedure in accordance with the requirements of ADM-0003 resulted in an apparent violation of Technical Specification Section 6.8.1.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

The new program, as described in Memorandum No. PMG-M-86-62, was discontinued on March 27, 1986 when the torque wrench calibration check device was relocated from the Maintenance Shop to the Site Standards Laboratory. This change resulted from the device's calibration having been suspected as out of tolerance. When returned to the Standards Laboratory, the device's calibration was confirmed to be out of tolerance by a 1.4 percent error for readings above 225 ft-lbs when used in the counter clockwise direction. A review of the M&TE Tracking Cards for the torque wrenches used during the 3 days of the new program, revealed that the torque wrenches in question were not used in the counter clockwise direction or in the ranges found out of tolerance. Therefore, all torque wrench applications during this period were acceptable.

As a result of the calibration check device being removed from service on March 27, 1986, subsequent torque wrenches issued were

required to be performed in accordance with the controls of ADM-0029. To ensure compliance with ADM-0029, Memorandum No. APM-M-86-59 was issued on April 2, 1986 rescinding the new program described in Memorandum No. PMG-M-86-62, dated March 25, 1986.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

The responsible Plant Staff Maintenance personnel are aware of the requirements of ADM-0003. General Maintenance Procedure, GMP-0092 is presently being developed as an alternative to the torque wrench program described in ADM-0029. The procedure will meet the intent of the program described in Memorandum No. PMG-M-86-62 and establish approved instructions for the calibration and control of torque wrenches. The approval of GMP-0092 is presently pending the receipt of a newly purchased torque wrench calibration check device. Torque wrenches will remain under the controls of approved procedure ADM-0029 until GMP-0092 is approved and issued.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance with the requirements of ADM-0029 was achieved on March 27, 1986 after the relocation of the torque wrench calibration check device.

ATTACHMENT 2

RESPONSE TO NOTICE OF VIOLATION 50-458/8616-03

LEVEL V

B. FAILURE TO FOLLOW PROCEDURES

REASON FOR THE VIOLATION

Procedure ADM-0005, Revision 4 (Station Document Control) requires that documents transmitted to satellite stations offsite be incorporated into manuals, etc. and the transmittal signed and returned within 10 working days of the date on the transmittal. Contrary to this requirement, 17 document transmittals older than 10 working days had not been incorporated into manuals located in the Emergency Operating Facility (EOF). Emergency Response Personnel were not updating EOF documents as required by ADM-0005. Also, Station Document Control (SDC) had not sent Delinquent Notices to the satellite station as also required by ADM-0005. Root cause of the problem appears to be a change in EOF personnel resulting in responsibility for updating documents not being carried over and leniency on the part of SDC because of the new personnel in EOF.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

All documents were incorporated into their respective manuals on the day that the discrepancy was discovered by the NRC Inspector. The transmittals were then signed and returned to SDC. The EOF Satellite Station is now in compliance with ADM-0005 requirements.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

The new EOF personnel were given training by the SDC Supervisor to ensure they understood their satellite station custodial responsibilities. Documentation is available to support the training given. Station Document Control personnel have been verbally instructed to comply with ADM-0005 requirements for issuing Delinquent Notices. A memorandum has been issued restating the verbal instructions given to SDC personnel.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.

ATTACHMENT 3

RESPONSE TO NOTICE OF VIOLATION 50-458/8616-02

LEVEL V

C. FAILURE TO FOLLOW PROCEDURES

REASON FOR THE VIOLATION

Station Support Procedure (SSP)-1-004, Revision 0 (Station Document Control System) states that the IS-217 Report is the primary document for identifying outstanding changes against Stone and Webster design documents. However, a modified IS-217 Report exists that identifies changes in the form of Pipe Support Revision Notices (PSRNs) to Category II and III large bore pipe support design drawings (i.e., BZ/PSDD drawings). The modified IS-217 is not addressed in SSP-1-004. Station Document Control (SDC) was not aware of the existence of PSRNs or the modified IS-217. Both documents had been previously distributed by Stone & Webster (S&W) Document System Group prior to this group's consolidation with GSU Station Document Control in late 1985. PSRNs were no longer being originated by S&W at the time of consolidation but some of those previously issued are not incorporated into their respective drawings, thus, they are still outstanding changes.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

The modified IS-217 is addressed in the Stone and Webster Engineering Corporation Plant Services Procedure (PSP)-3.1-0, "Applicability of Construction Phase Interim Design Change Mechanism to Operation", dated August 28, 1985. An approved change to SSP-1-004 has been implemented which addresses the modified IS-217 Report and references PSP-3.1-0. SSP-1-004 also discusses the need for using both the IS-217 and the modified IS-217 to ensure a BZ/PSDD is current.

CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

The modified IS-217 will be distributed on a as-needed basis to document satellite stations. Since the IS-217 Report and the modified IS-217 Report are the only documents available for identifying outstanding changes against Stone and Webster design documents, this is determined to be an isolated case.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.