In Reply Refer To: Docket: 50-458/86-30

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 letter of December 22, 1986, in response to our letter and Notice of Violation dated November 12, 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-River Bend Oversight

P. O. Box 2951

Beaumont, Texas 77704

Louisiana State University, Government Documents Department

Louisiana Radiation Control Program Director

bcc: (see next page)

MEMarphy:cs 2/19/87

C: RPB/A JPJaudon 2/10/87

C: RPB JEGagliardo 2/2/87

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Gulf States Utilities

bcc to DMB (IEO1)

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, RM/ALF RSB Project Inspector R. Hall

GULF STATES UTILITIES COMP RIVER BEND STATION FOST OFFICE BOX 220 ST FRANCISVILLE, LOUISIANA 70775 AREA CODE 504 635-6094 346-8651 December 22, 1986 RBG- 25121 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 86-30 This letter responds to the Notice of Violation contained in NRC I&E Inspection Report No. 50-458/86-30. The inspection was perfromed by Mr. M. E. Murphy during the period September 22-26, 1986 of activites authorized by NRC Operating License NPF-47 for River Bend Station - Unit 1. Gulf States Utilities Company's (GSU) response to Notice of Violation 86-30, "Failure to Identify an Inoperable Fire Door and Establish the Required Fire Watch", is provided in the enclosed attachment at this time as per telephone conversations with your staff. This completes GSU's response to the Notice of Violation. Sincerely, W. J. Cahill, Jr Senior Vice President River Bend Nuclear Group WJC/ERG/JWL/RI TEB Attachments 8701050241

# UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

STATE OF LOUISIANA

PARISH OF WEST FELICIANA

In the Matter of

GULF STATES UTILITIES COMPANY

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Docket Nos. 50-458

(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.

Subscribed and sworn to before me, a Notary Public in and for the State and Parish above named, this 22nd day of Recember, 1986.

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

Louisiana

My Commission is for Life.

# ATTACHMENT

# RESPONSE TO NOTICE OF VIOLATION 50-458/8630-01 LEVEL IV

#### REFERENCE

Notice of Violation - J. E. Gagliardo letter to W. J. Cahill, Jr. dated November 12, 1986.

# FAILURE TO IDENTIFY AN INOPERABLE FIRE DOOR AND ESTABLISH THE REQUIRED FIRE WATCH

Technical Specification Surveillance Requirement 4.7.7.2 requires, in part, that fire doors shall be verified operable by inspecting the closing mechanism and latches and by verifying at least once per 24 hours that each unlocked fire door without electrical supervision is closed.

Technical Specification Limiting Condition for Operation (LCO) 3.7.7 requires, in part, that all fire barrier assemblies shall be operable and identifies fire doors as fire barrier assemblies. The action statement for this LCO requires the establishment of a continuous fire watch within 1 hour or verify the operability of fire detectors on at least one side of the inoperable assembly and establish an hourly fire watch patrol.

Contrary to the above, fire door CB-116-23 was found to be inoperable on September 24, 1986, due to the absence of a lock mechanism, and with the closing and latching mechanisms disabled. This condition had not been identified or reported during the daily fire door position check of procedure STP-000-3001 from June through September 1986; thus, the required fire watch had not been provided.

#### REASON FOR THE VIOLATION

During a revision of the security program to utilize the vital island concept (as opposed to vital areas) the door in question (CB-116-23) was downgraded from a security door to a free access door. This revision was made prior to implementation of the current design control program, and did not consider other design requirements for this door.

Also, Surveillance Test Procedures (STP's) by which this door was verified operable were determined to be insufficient. While the door was verified to be closed, the STP's did not require an inspection of the latches and closing mechanisms.

#### ATTACHMENT (cont'd.)

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

Upon identification of this concern, the actions required by Technical Specification Limiting Condition for Operation (LCO) 3.7.7 were implemented. Investigation into this condition determined that operable fire detection existed on at least one side of the fire barrier and that an hourly fire watch patrol had been previously implemented on March 19, 1986 for this area by LCO 86-235.

STP-000-3001, "Daily Fire Door Position Check" has been revised to clarify the acceptance criteria for normally closed fire doors to include a check of latches and closing mechanisms.

## CORRECTIVE STEPS WHICH WERE TAKEN TO PREVENT RECURRENCE

Following the clarification to STP-000-3001, the subsequent performance of the STP identified several additional doors with inadequate latching mechanisms. Fire watches were implemented in each case as required by the Technical Specification.

A review was conducted of each door which was similarly downgraded as CB-116-23 was from a security door to a free access door. This review was to determine if the downgrading may have affected other design requirements for the door. Additional doors were determined to have had their fire barrier design requirements affected in violation of the Technical Specifications. Fire watches will remain in effect for each of these doors until appropriate modifications are completed to return them to a configuration which meets the fire barrier design requirements.

# DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

River Bend Station has been in compliance since establishment of the fire watches in accordance with the Technical Specifications.