



**GULF STATES UTILITIES COMPANY**

RIVER BEND STATION POST OFFICE BOX 220 ST. FRANCISVILLE, LOUISIANA 70775  
AREA CODE 504 635-8094 346-8651

June 30, 1987  
RBG- 26187  
File No. G9.5, G15.4.1

U. S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, D. C. 20555

Gentlemen:

River Bend Station - Unit 1  
Refer to: Region IV  
Docket No. 50-458/Report 87-11

This letter responds to the Notice of Violation contained in NRC Inspection Report No. 50-458/87-11. The inspection was performed by Dr. J. B. Nicholas during the period April 13-17, 1987 of activities authorized by NRC Operating License NPF-47 for River Bend Station.

Gulf States Utilities Company's (GSU) response to Notice of Violation 8711-01, "Failure to Use Offsite Dose Calculation Manual (ODCM) Methodology to Project Doses", is provided in the enclosed attachment pursuant to 10CFR2.201. This completes GSU's response to this item.

Sincerely,

J. C. Deddens  
Senior Vice President  
River Bend Nuclear Group

*erg*  
JCD/ERG/RJK/JWC/ehs

Attachments

cc: U. S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76011

Senior Resident Inspector  
U. S. Nuclear Regulatory Commission  
P. O. Box 1051  
St. Francisville, LA 70775

8707080085 870630  
PDR ADDCK 05000458  
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UNITED STATES OF AMERICA

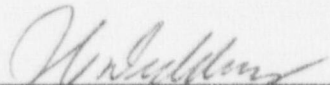
NUCLEAR REGULATORY COMMISSION

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

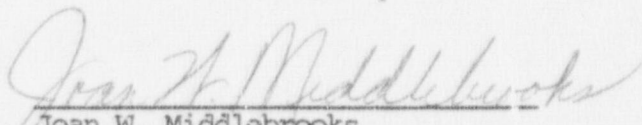
(River Bend Station,  
Unit 1)

AFFIDAVIT

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.

  
\_\_\_\_\_  
J. C. Deddens

Subscribed and sworn to before me, a Notary Public in and for the State and and Parish above named, this 30th day of June, 1987.

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

My Commission is for Life.

ATTACHMENT  
RESPONSE TO NOTICE OF VIOLATION 50-458/8711-01  
LEVEL V

REFERENCE

Notice of Violation - J. E. Gagliardo letter to J. C. Deddens, dated May 29, 1987.

FAILURE TO USE ODCM METHODOLOGY TO PROTECT DOSES

Technical Specification 3/4.11.1.3 states that doses due to liquid releases to unrestricted areas shall be projected in accordance with the methodology and parameters in the ODCM. This requirement is implemented by the use of Surveillance Test Procedure (STP)-511-8208.

Contrary to the above, the NRC inspector determined on April 15, 1987, that the calculations performed using the format in STP-511-8208 during the period July 1986 through March 1987, did not agree with the methodologies specified in the ODCM.

This is a Severity Level V violation.

REASON FOR THE VIOLATION:

Personnel error was determined to be the reason for this oversight. A change to STP-511-8208 was drafted in conjunction with the ODCM revision but not issued for revision and approval. Personnel in Radiological Engineering did not follow up on the change to ensure it was incorporated.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

Temporary Change Notice (TCN) Number 87-0343 was submitted on 4/16/87 and approved on 4/21/87 to correct STP-511-8208 to agree with the ODCM methodology.

Comparisons of the two calculational methods were performed for the period since the ODCM method was changed. Using the less conservative STP methodology, entrance into the Technical Specification 3/4.11.1.3 action statement was required in July and October 1986. Using the ODCM methodology, two additional months - November 1986 and January 1987, required entrance into the action statement. A review of radioactive releases during these months indicated that all releases were treated via the radioactive waste treatment system prior to their discharge as required under Technical Specification 3/4.11.1.3.

CORRECTIVE STEPS WHICH HAVE BEEN TAKEN TO AVOID FURTHER VIOLATIONS

The ODCM/Procedure revision log (Attachment 1 to RSP-008) will be revised to incorporate a sign-off by the Radiological Engineering Supervisor or his designee to review, for applicability, any change(s) to lower tier implementing procedures with regard to ODCM revisions. This should assure revisions and changes are implemented as appropriate.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

STP-511-8208 has been revised (TCN 87-0343) and approved on 4/21/87. The RBS dose projection procedures are in compliance with the current ODCM methodology.

The ODCM/Procedure revision log will be revised by August 14, 1987.