

In Reply Refer To:
Docket: 50-458/89-09

JUN - 5 1989

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

Gentlemen:

Thank you for your letter of May 5, 1989, in response to our letter and inspection report dated April 5, 1989. We have reviewed your reply and find it responsive to the concerns raised in our inspection report. We will review the implementation of your corrective actions during a future inspection. In reference to Exercise Weakness 50-458/8909-02, it is our understanding, after holding telephone conversations, that the incumbent recovery manager will demonstrate his command and control abilities during the June 21, 1989 drill.

Sincerely,

Baker, for:
L. J. Callan, Director
Division of Reactor Projects

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

Gulf States Utilities
ATTN: Les England, Director
Nuclear Licensing - RBNG
P.O. Box 220
St. Francisville, Louisiana 70775

(cc's continued)

Str
RTV:SEPS
NTE/STR
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C:SESP
JEverett
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C:RPB
BMurray
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Gulf States Utilities

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Chief, Technological Hazards Branch
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bcc to DMB (IE35)

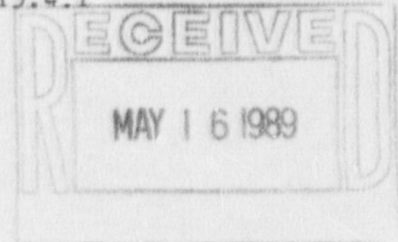
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GULF STATES UTILITIES COMPANY

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U. S. Nuclear Regulatory Commission
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Gentlemen:

River Bend Station - Unit 1
Refer to: Region IV
Docket No. 50-458/Report 89-09

Pursuant to 10CFR2.201, this letter provides Gulf States Utilities Company's (GSU) responses to the exercise weaknesses noted in NRC Inspection Report No. 50-458/89-09. The inspection was performed by Mr. N. M. Terc during the period of March 1-3, 1989 of activities authorized by NRC Operating Licensing NPF-47 for River Bend Station - Unit 1. GSU's responses are provided in the attachments. This completes GSU's responses to these items.

Should you have any questions, please contact Mr. L. A. England at (504) 381-4145.

Sincerely,

J. E. Booker
Manager-River Bend Oversight
River Bend Nuclear Group

John
JEB/LAE/JWC/ch

Attachments

cc: U. S. Nuclear Regulatory Commission
Region IV
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Arlington, TX 76011

NRC Senior Resident Inspector
P. O. Box 1051
St. Francisville, LA 70775

~~50-458/89-09~~ bpp.
IC-89-183

ATTACHMENT 1

Response to Weakness 50-458/8909-01

REFERENCE

Letter - L. J. Callan letter to J. C. Deddens, dated April 5, 1989

DESCRIPTION

The NRC inspection team noted that no information feedback protocol exists to ensure that directives are clearly understood. On one occasion, for example, the Shift Supervisor directed his staff to secure the hydrogen purge, but this directive was ignored. As a consequence, the release of radioactivity to the environment continued for 15 minutes.

GULF STATES UTILITIES COMPANY'S RESPONSE

Two procedures were in place at the time of the exercise to provide instructions for Operations to effectively communicate. Administrative procedure ADM-0022, "Conduct of Operations", states:

"Communications between operating personnel shall be clear and concise, utilizing repeat-backs or written direction whenever possible. When evolutions are completed, personnel should report this, so verifications of plant or system responses can be observed."

The second procedure, OSP-0009, "Author's Guide/Control and Use of Emergency Operating Procedures", states:

"The most important 'ingredient' is the dialog between the Control Operating Foreman and the Nuclear Control Operator(s). Each person must know what is required to be done, what has been done, and what cannot be done."

The instruction should be repeated back to the Control Operating Foreman to assure correct communication occurred."

The following actions are utilized to reinforce the philosophy of the above procedures:

- a. The importance of communication is reinforced continually in the simulator and critiqued with each scenario the crew is subjected to.
- b. The Operations Supervisor has personally provided each crew with guidance on communication via video tape training called, "Closed Loop Communication".

ATTACHMENT 2

Response to Weakness 50-458/8909-02

REFERENCE

Letter - L. J. Callan letter to J. C. Deddens, dated April 5, 1989

DESCRIPTION

The NRC inspection team noted that the TSC was unable to fulfill its required function during the simulated emergency. One of the factors contributing to this problem was inadequate information flow to and from the CR, and also deficient information flow within the TSC. The NRC inspection team noted that, in general, command and control by the Recovery Manager in the EOF was poor. Various specific findings were noted that characterize these observations.

GULF STATES UTILITIES COMPANY'S RESPONSE

Gulf States Utilities is currently taking those actions as previously outlined in our letter from J. C. Deddens to Mr. Robert D. Martin dated March 17, 1989.

As of April 12, 1989 the position of TSC/CR Communicator was created and three qualified SRO or SRO certified individuals have been assigned to the River Bend Station Emergency Response Organization. The initial responsibility of this position is to communicate with the NRC Incident Response center via the ENS. Once the TSC is operational, the TSC/CR Communicator's sole function will be to provide the updated plant status and operations shift actions to the TSC and the EOF.

Prior to revising the RBS Emergency Plan and appropriate Emergency Implementing Procedures (EIPs), a rapid-paced/challenging drill will be conducted to determine the effectiveness of these changes to the organizational structure. This drill will be conducted in July, 1989 with necessary changes to the Plan and EIPs to be completed by September 30, 1989.

In reference to the poor command and control exhibited by the Recovery Manager, the deficient items were addressed with the Recovery Manager during the critique and correct actions were reinforced. GSU feels that this was an isolated case. GSU will demonstrate correct command and control during the July, 1989 drill.

- c. Training and Operations have and will continue to require proper communications be utilized in all evaluations.

The ability to effectively communicate direction and orders will be demonstrated during a rapid-paced/challenging drill to be conducted in July, 1989.

ATTACHMENT 3

Response to Weakness 50-458/8909-03

REFERENCE

Letter - L. J. Callan letter to J. C. Deddens, dated April 5, 1989

DESCRIPTION

The NRC inspector noted that the OSC Coordinator dispatched one team to perform maintenance activities in-plant without a radiation protection technician. This is contrary to Procedure EIP-2-017, "Operation Support Center-Support Function," which requires radiation protection support when teams are dispatched to radiological control areas.

GULF STATES UTILITIES COMPANY'S RESPONSE

A review of EIP-2-017, Section 6.1.1, Step 12 indicates that this requirement is unduly restrictive in that it does not allow the OSC Coordinator to not send a Radiation Protection Technician with maintenance activities when conditions do not warrant such coverage. This procedure will be revised to allow this flexibility. This revision will be completed by September 30, 1989.

ATTACHMENT 4

Response to Weakness 50-458/8909-04

REFERENCE

Letter - L. J. Callan letter to J. C. Deddens, dated April 5, 1989

DESCRIPTION

The NRC inspection team noted that the licensee's first attempt to identify and characterize exercise weaknesses during their formal critique with the NRC was deficient in that it did not properly characterize the findings according to their significance. However, the licensee continued their efforts immediately following their critique and properly identified and characterized many of the significant findings by the NRC inspection team.

GULF STATES UTILITIES COMPANY'S RESPONSE

At the time of our exercise, GSU did not fully appreciate the need to characterize our findings during our verbal critique process. GSU has issued a formal evaluation report delineating those areas identified as weaknesses or needing improvement and assigning responsibility for implementing corrective actions. In addition, the following actions have been taken:

- GSU met with all Region IV plants to discuss their methods for conducting exercise weaknesses and characterizing events.
- Observed the exercise including the critique process at Arkansas Nuclear One.
- Reviewed the requirements of 10CFR50 and NUREG-0654 for drill/exercise critiques.

As a result of the above actions we now have a better understanding of this need and will characterize our findings in the future. This will be demonstrated as a part of our 1990 NRC evaluated exercise to be conducted in February 1990.