GULF STATES UTILITIES COMPA

PTV IR BEND STATION POST OFFICE BOX 220 ST FRANCISVILLE LOUISIANA 70775

September 29, 1989

RBG- 31591 File Nos. G9.5, G15.4.1

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

Gentlemen:

River Bend Station - Unit 1 Refer to: Region IV Docket No. 50-458/89-31

Pursuant to 10CFR2.201, this letter provides Gulf States Utilities Company's (GSU) response to the Notice of Violation for NRC Inspection Report No. 50-458/89-31. The inspection was conducted by Messrs. Ford and Jones during the period July 1 - 31, 1989 of activities authorized by NRC Operating License NPF-47 for River Bend Station - Unit 1. GSU's initial response to the violation is provided in the attachment. A supplemental response detailing GSU's corrective action will be provided by May 31, 1990.

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

Sincerely,

J. C. Deddens

Senior Vice President River Bend Nuclear Group

JCD/JEB/LAE/RJK DWC/RGW/ch

Enclosure.

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

> Senior Resident Inspector Post Office Box 1051 St. Francisville, LA 70775

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#### UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

STATE OF LOUISIANA	)	
PARISH OF WEST FELICIANA	)	
In the Matter of	)	Docket No. 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 Parish above named, this 29 day of Sept, 1950. My Commission expires with Life.

Claudia F. Hurst

Notary Public in and for

West Feliciana Parish, Louisiana

#### ATTACHMENT

### RESPONSE TO NOTICE OF VIOLATION 50-458/8931-01 LEVEL IV

### REFERENCE

Notice of Violation - Letter from J. L. Milhoan to J. C. Deddens, dated September 1, 1989.

## FAILURE TO IMPLEMENT ADEQUATE CORRECTIVE ACTIONS

10CFR50, Appendix B, Criterion XVI, and the licensee's Quality Assurance Directive QAD-16, "Corrective Actions," Revision 6, paragraph 4.3, states that procedures shall require that corrective action be promptly initiated and adequately documented to correct the condition and to determine if action is necessary to preclude its recurrence.

Administrative Procedure ADM-0019, "Initiation and Processing of Condition Reports." Revision 8, assigns the responsibility to identify, initiate, evaluate, analyze, disposition, and document conditions discovered by River Bend Station personnel that may or may not conform to established requirements and may impact on the safe and reliable operation of the plant.

Block 10 of Condition Report (CR) 89-0262, dated March 24, 1989, establishes the corrective actions to be taken following the removal of the incorrect circulating water system valve and cutting of the incorrect residual heat removal test return line. The corrective actions to be taken are identified in a Stone & Webster (S&W) memorandum dated March 24, 1989. The corrective actions included:

- o effective immediately, a verbal/written turnover between S&W supervision and all Orange Book Craft supervision will no longer be adequate;
- o the S&W supervisor and the craft foreman will be required to assure that any component being worked on is the correct component and has been removed from service per all applicable GSU site procedures; and
- o all future maintenance work orders (MWOs) either processed or assigned to S&W Projects will be routed through QC for the same verification.

Contrary to the above, the corrective actions identified in Block 10 of CR 89-0262 were not adequately implemented for MWO R125591 (Installation of Preferred "F" station transformer, 1RTX-XSR1F). Verbal turnovers between S&W supervision and craft foremen were conducted, assurance that the correct component was being worked was not performed, and a quality control review of the MWO package which was assigned to S&W Projects was marked "n/a." As a result, a loss of offsite power to the Division II emergency bus occurred on June 14, 1989, when the Transformer 1RTX-XSR1F sudden pressure trip wire was cut, which was in parallel with the 1RTX-XSR1D sudden pressure trip.

## REASON FOR THE VIOLATION

NRC Inspection Report 50-458/89-31 identified a violation, "Failure to Implement Adequate Corrective Action." The violation is a result of three events involving S&W personnel performing work in the plant during the second refueling outage.

The first and second events took place over a two day period as identified on Condition Report (CR) 89-0249 and CR 89-0262. The cause of these events was determined to be lack of communication between S&W personnel and a lack of procedural compliance. The third event, identified on CR 89-0805 and reported in Licensee Event Report 89-029 took place approximately three months later. The cause of this event was determined to be lack of communication between S&W supervision and crafts.

After reviewing the aforementioned events, GSU determined that the root cause of this violation was GSU's failure to properly monitor S&W's supervision of their contract personnel. Specifically, GSU did not provide adequate management of the contractor to ensure continued implementation of the corrective action identified on CR 89-0262.

Also in the report, the inspector stated that the work controls should have been more extensive to avoid the event described in CR 89-0805. A review of the job plan for MWOR 125591 revealed that controls were deficient. The deficiencies included failure to isolate the trip circuit from the maintenance activity and failure to provide adequate warnings in the job plan to inform Maintenance personnel that the circuit was energized.

# CORRECTIVE ACTIONS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

At the time of the event described on CR 89-0805, the following steps were taken:

- o The leads were lifted to isolate the trip circuit until the leads were properly terminated on the replacement transformer.
- o Senior GSU management personnel were placed on shift to review all work packages prior to release for work for the duration of the outage. This review was performed to screen work packages which could have lead to similar events.

Since there are no significant number of contract personnel on site between outages, no additional corrective actions are necessary prior to manning for the third refueling outage (RF3).

#### CORRECTIVE ACTIONS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

GSU is presently reviewing its methods for contracting out certain outage related work. Discussions are being held with contractors and other utilities to determine optimum methods for control of contractors during extended plant outages.

Specific items under evaluation include: 1) use of long-term contracts for major outage activities, 2) assignment of GSU personnel with field experience to each major contractor, 3) use of incentive contracts to encourage error-free performance, and 4) methods for eliminating clearance permit

violations. In addition to the above, training for contractor supervisors, foremen, and crafts will be strengthened in the areas of procedural compliance and communications.

Concerning the issue of inadequate job plans, GSU is currently experimenting with an improved process. This upgrade process consists of using a detailed job plan checklist for the planner to follow when planning the work. In addition, the foreman who executes the job plan evaluates the planner's work using the same checklist. To date, this upgrade process shows definite potential for improving work controls at River Bend. When the checklist is refined, the process will be proceduralized.

Supervision of the work planning area has been increased with the addition of a Supervisor of Maintenance Services reporting directly to the Assistant Plant Manager-Maintenance. This senior Plant Staff individual has the maintenance planning section reporting to him. This organizational change provides more direct supervision of this effort than previous arrangements.

## DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Proceduralizing the job plan checklist will be completed by December 31, 1989. A supplement to this response describing GSU's actions to insure proper supervision of contract personnel will be submitted no later than May 31, 1990.

All corrective action will be fully implemented prior to the start of RF3. RF3 is presently scheduled to start in September, 1990.