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GNRO-2012/00007

February 13, 2012

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

SUBJECT: Reply to Notice of Violation EA-2012-015  
Grand Gulf Nuclear Station, Unit 1  
Docket No. 50-416  
License No. NPF-29

REFERENCE: GNRI-2012/00013, Grand Gulf Nuclear Station - NRC Problem Identification  
And Resolution Inspection Report No. 05000416/2011006 And Notice Of  
Violation dated January 13, 2012.

Dear Sir or Madam:

Entergy Operations, Inc. (Entergy) hereby submits the Reply to Notice of Violation EA-2012-015 for Grand Gulf Nuclear Station in Attachment 1. This Notice of Violation was issued in Nuclear Regulatory Commission Problem Identification and Resolution Inspection Report No. 05000416/2011006 and Notice of Violation.

There are no regulatory commitments contained in this letter.

If you have any questions or require additional information, please contact Christina L. Perino at 601-437-6299.

Sincerely,

A handwritten signature in cursive script, appearing to read "Christina L. Perino".

CLP/JAS

Attachments:

1. Response to Notice of Violation; EA-2012-015

cc: (see next page)

cc: Mr. Elmo E. Collins, Jr.  
Regional Administrator, Region IV  
U. S. Nuclear Regulatory Commission  
1600 East Lamar Boulevard  
Arlington, TX 76011-4511

U. S. Nuclear Regulatory Commission  
ATTN: Mr. A. Wang, NRR/DORL  
Mail Stop OWFN/8 G14  
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Rockville, MD 20852-2378

State Health Officer  
Mississippi Department of Health  
P. O. Box 1700  
Jackson, MS 39215-1700

NRC Senior Resident Inspector  
Grand Gulf Nuclear Station  
Port Gibson, MS 39150

**Attachment 1**

**GNRO-2012/00007**

**Response to Notice of Violation; EA-2012-015**

## **RESPONSE TO NOTICE OF VIOLATION**

### **I. Cited Violation**

During a Nuclear Regulatory Commission (NRC) inspection conducted on October 3 through October 20, 2011, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

Criterion XVI of Appendix B of 10 CFR 50, "Corrective Action," requires that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected.

Contrary to the above, since 2004, a condition adverse to quality was not promptly identified and corrected. Specifically, an uncharacterized flaw on the Division II emergency diesel generator lube oil sump had been leaking oil and this condition has not been corrected.

This violation is associated with a Green Significance Determination Process finding (EA-2012-015).

### **II. The Reason for the Violation**

Entergy concurs with the violation as described in the inspection report. Specifically, "an uncharacterized flaw on the Division II emergency diesel generator lube oil sump had been leaking oil and this condition has not been corrected." This Division II diesel generator (DG-2) violation was the result of a failure to properly apply the use-as-is standard described in the Corrective Action Process procedure EN-LI-102, section 5.8[1](g)(2), "Items that are classified as use-as-is or repair are required to have a formal engineering evaluation with technical justification, augmented inspection and/or test requirements, and design reviews as appropriate." In not following this procedural requirement, Grand Gulf Nuclear Station (GGNS) did not provide a sufficiently rigorous evaluation to ensure the emergency diesel generator lube oil sump would not be further challenged should the flaw degrade.

### **III. Corrective Steps Which Have Been Taken and Results Achieved**

GGNS performed an evaluation to determine the causes for the violation. The evaluation identified organizational and programmatic weakness that contributed to the issue and performed an extent of condition evaluation. There is no longer an accept-as-is disposition in place for the DG-2 Lube Oil Sump.

Corrective actions that have been completed:

A leak rate limit was established for the DG-2 Lube Oil Sump. This action is documented in Condition Report CR-GGN-2011-7433 Corrective Action CA-3, completed on 11/4/2011.

Work Request (WR) 293983 was generated on 11/2/2011 to repair the sump. This action is documented in Condition Report CR-GGN-2011-07433 Corrective Action CA-1.

GGNS Engineering Support Personnel (ESP) have completed interactive training focused on the elements of an Engaged Thinking Organization. This training utilized case studies to explore industry events that have resulted from organizations that were not sufficiently engaged.

Design Engineering has initiated a Training Evaluation and Action Request (TEAR) to determine if training is needed on accept-as-is dispositions. This will ensure the proper use of accept-as-is or use-as-is evaluations in the future (TEAR-2012-080).

**IV. Corrective Steps That Will be Taken to Avoid Further Violations**

There is an action to implement more detailed leakage rate monitoring with established limits for change. This action is driven by CR-GGN-2012-00346 CA-12 with a scheduled completion date of 6/30/2012.

There is an action for System Engineering to develop a plan to repair the Division II Diesel Generator Lube Oil sump tank. This action is driven by CR-GGN-2012-00346 CA-11 with a scheduled completion date for the plan development of 6/30/12.

There is an action to evaluate all engineering requests (ER) and engineering changes (EC) with "accept-as-is" dispositions for safety related equipment for similar conditions from 2005 - 2011. This action is driven by CR-GGN-2012-00346 CA-10 with a scheduled completion date of 6/30/2012.

Additionally, to avoid similar violations, GGNS Licensing will review NRC findings and violations from 2009-2011 for effectiveness of corrective actions. Any violations addressed with no action, need to be evaluated to confirm adequate decision making. Action is driven by CR-GGN-2012-00346 CA-13 with a scheduled completion date of 6/30/2012.

**V. Date When Full Compliance Will be Achieved**

Entergy has removed the "accept-as-is" disposition for the oil leak and placed the issue back in the corrective action process. A limit has been established for the leakage rate from the Division II emergency diesel generator lube oil sump. The Division II emergency diesel generator is currently OPERABLE and capable of performing its required function. A Work Order has been generated to repair the sump. The work to fully characterize or repair the flaw is planned to be performed as part of a major overhaul activity currently scheduled for October 2012. Conditions identified during the preparation or implementation of this activity will influence the final resolution of the issue.