



MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

P. O. BOX 1030, JACKSON, MISSISSIPPI 39205

JAMES P. McGAUGHY, JR.
ASSISTANT VICE PRESIDENT

August 28, 1981

Office of Inspection & Enforcement
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, N.W.
Suite 3100
Atlanta, Georgia 30303

Attention: Mr. J. P. O'Reilly, Director

Dear Mr. O'Reilly:



SUBJECT: Grand Gulf Nuclear Station
Units 1 and 2
Docket Nos. 50-416/417
File 0260/15525/15526
PRD-80/71, Final Report
HVAC Fire Dampers
AECM-81/301

References: 1) AECM-81/117, 3/25/81
2) AECM-81/28, 1/15/81

On December 16, 1980, Mississippi Power & Light Company notified Mr. J. Rausch, of your office, of a Potentially Reportable Deficiency (PRD) at the Grand Gulf Nuclear Station (GGNS) construction site. The deficiency concerns the unauthorized modification of HVAC Fire Dampers.

During the investigation of this deficiency it was discovered that one damper, CV-13G, was a non-safety related damper installed in a safety-related position. Our Constructor originally intended to track this, along with the unauthorized modifications, under QAR-265 and PRD-80/71.

However, the decision was made to track this instead under MCAR-111, PRL-80/67. This problem will be addressed in that final report.

We have determined that this deficiency would not affect the safety of operations of the nuclear power plant and is not reportable under the provisions of either 10CFR50.55(e) or 10CFR21. Attached is our final report giving our rationale.

Yours truly,

for J. P. McGaughy, Jr.

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ATTACHMENT

cc: See page 2

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S.I.!

Mr. J. P. O'Reilly
NRC

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FINAL REPORT FOR PRD-80/71

I. Description of the Deficiency

Type 2 trap door fire dampers were modified in the field by the subcontractor, General Mechanical Contractors (GMC), without either the vendor's, American Warming & Ventilation (AWV), or our Constructor's, Engineering approval. Hinge joints and latches were relocated 90 degrees from design location affecting the geometry of the installation.

The systems affected by this deficiency are the Control Room HVAC System (Z51) and the Battery Room Ventilation System (Z77). The deficiency is applicable to Unit 1 and common. It does not apply to the NSSS vendor.

The possibility existed that, during a seismic event, the safe operation of the control room HVAC system could be affected if the fire dampers were to fail as a result of the modification.

II. Analysis of Safety Implications

The modified dampers were in the safety-related Control Room HVAC System (Z51) and the Emergency Switchgear and Battery Room Ventilation System (Z77). Some were also located in various other non-safety-related systems.

Complete as-built data detailing the field modifications was sent to AWV for review and evaluation. The modified dampers were also tested at AWV's direction to ensure proper closure and latching.

The damper vendor then conducted a review of the unapproved modifications and determined that the modified dampers as installed will function and are still in compliance with NFPA codes, UL classification, and seismic requirements. Because of this evaluation it has been determined that this condition would not affect the safety of operations of the nuclear power plant and is not reportable under the provisions of 10CFR50.55(e) or 10CFR21.

III. Corrective Actions Taken

The cause of the deficiency was that certain of our Constructor's personnel permitted the subcontractor, GMC, to modify the fire dampers without proper Constructor or vendor authorization.

All responsible personnel have been instructed that any modification to vendor equipment necessitates prior vendor or engineering approval.

Since the deficiency was determined to be not reportable, no further corrective actions are required.