



MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

NUCLEAR PRODUCTION DEPARTMENT

September 4, 1981



Mr. Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Eisenhut:

SUBJECT: Grand Gulf Nuclear Station
Units 1 and 2
Docket Nos. 50-416 and 50-417
File 900C/0494/16681/16441/M-189.1
NRC Generic Letter 81-01
Qualification of Inspection,
Examination, and Testing
Personnel
AECM-81/245

This letter is in response to subject generic letter requesting commitment to Regulatory Guide 1.58 Rev. 1 (September 1980), ANSI N45.2.6 - 1978 (with noted exceptions), Regulatory Guide 1.146 (August 1980) and ANSI/ASME N45.2.23 - 1978 (with noted exceptions).

In the Mississippi Power & Light (MP&L) Quality Assurance Program (MPL-TOP-1A) accepted by NRC, Grand Gulf Nuclear Station is committed to Regulatory Guide 1.58 (Revision 1) and Regulatory Guide 1.146 (August 1980) for preoperational, startup testing, and operational phase activities, with noted clarifications.

For construction phase activities MP&L Quality Assurance shall comply with the NRC accepted Quality Assurance Program (MPL-TOP-1A) for auditors and lead auditors. MP&L's architect-engineer/constructor has developed a program to comply with Regulatory Guide 1.146 (August 1980) without exception, other than the extension of the compliance to suppliers and subcontractors. Full compliance with this program was accomplished on August 11, 1981.

With respect to construction phase activities, however, MP&L takes exception to one aspect of Regulatory Guide 1.58 Rev. 1 (September 1980). In C-6 there is a requirement that inspection, examination and testing personnel have either a high school diploma or have earned the general education development equivalent of said diploma and in addition ANSI/ASME N45.2.6-1978 lists requirements of further educational or experience requirements. The current program for MP&L's architect-engineer/constructor for inspection/testing personnel is in line with the education/experience recommendations of ANSI N45.2.6-1978. However, due to the diversity of background, training and experience of our personnel, we give consideration to such factors as demonstrated capability in a given job, through previous performance or proficiency testing, when certifying personnel to level I, II, or III.

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The imposition of the mandatory High School/GED equivalency and the Associate Arts degree plus three month's experience on our personnel certification program would have an adverse effect on our ongoing activities as follows:

- 1) With regard to Unit 1, there would be no benefit derived by the project at this late stage. Unit 1 is 90% complete and at the end of May, 1981, Checkout & Turnover (CTO) had completed testing 34% of the systems and had turned over 74% to MP&L.

Although the aforementioned adverse effect would be applicable only to Unit 1, the following considerations apply equally to Unit 1 and Unit 2.

- 2) The minimum High School/GED educational requirement and Associate Arts plus three months' experience requirement would contribute to additional difficulties in hiring Quality Control Engineering (QCE) and test personnel. This would, no doubt, contribute to increased manpower turbulence, which the project can ill afford at this time.
- 3) We would expect some difficulty in getting various schools, both in the U.S. and abroad to cooperate and provide transcripts for High School/GED equivalency.
- 4) Possible adverse Equal Employment Opportunity/Affirmative Action implications could be involved in imposing the minimum High School/GED requirements on the program.

Therefore MP&L is adopting the option of using an alternative method of complying with 10 CFR 50 by continuing to certify testing, inspection, and examination personnel assigned to construction phase activities, on the basis of their demonstrated capability for a given job, through past performance and/or proficiency testing.

Concerning the imposition of Regulatory Guide 1.58, Rev. 1 and Regulatory Guide 1.146, dated August 1980, on suppliers and subcontractors, subsection 1.2, we foresee a great deal of adverse impact since existing purchase orders/subcontracts do not contain requirements for imposition of these Regulatory Guides, however, for the reasons enumerated above for the architect-engineer/constructor, we do not favor changing our policy with regard to future purchase orders/subcontracts.

Yours truly,



L. F. Dale

Manager of Nuclear Services

PJR/JDR:jgt

cc: (See Next Page)

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cc: Mr. N. L. Stampley
Mr. R. B. McGehee
Mr. T. B. Conner
Mr. G. B. Taylor

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