



MISSISSIPPI POWER & LIGHT COMPANY

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P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

NUCLEAR PRODUCTION DEPARTMENT

September 23, 1981



Mr. Robert L. Tedesco  
Assistant Director of Licensing  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Tedesco:

SUBJECT: Grand Gulf Nuclear Station  
Units 1 and 2  
Docket Nos: 50-416 and 50-417  
File: 0260/0277/L-860.0  
Equipment Qualification  
AECM-81/365

The purpose of this letter is to document the telephone discussions of September 21, 1981, between Mr. Di Benedetto and Mr. Kennedy of your Equipment Qualification Branch and our Mr. T. M. Johnson. It is our understanding that the Equipment Qualification audit for Grand Gulf will be held October 19 through October 22, 1981.

If you have any questions, please advise.

Yours truly,

L. F. Dale  
Manager of Nuclear Services

TMJ/SHH/JDR:ad

Attachment

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

Mr. Victor Stello, Jr., Director  
Office of Inspection & Enforcement  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

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TOPICS DISCUSSED WITH NRC STAFF  
RELATED TO FUTURE EQUIPMENT  
QUALIFICATION AUDIT AT GRAND GULF

Subject to agreements discussed below, it was decided that the Grand Gulf NEQ audit will be held October 19 through October 22, 1981.

1. NSSS Qualification files should be developed in an improved format as was discussed and presented by General Electric in a Sept. 18, 1981 meeting with the staff. MP&L committed to have the NSSS qualification records in such a format by audit time for components which are qualified at that time. For components which are not yet qualified, these records will be similarly improved prior to final qualification.
2. Equipment walkdowns should be performed as necessary to ensure that the component installed is the same as the component evaluated. Both BWR's audited to date were found to have erroneous equipment lists, and this is grounds for audit failure.

MP&L committed to have a documented and defined walkdown program substantially underway prior to the audit. Equipment which is presently qualified should be inspected prior to the audit, or MP&L's qualification status should be modified to reflect "Pending final inspection".

NOTE: Credit may be taken for previous walkdowns, provided details on how the proper equipment (as defined in our NUREG 0588 submittal) has been verified as installed.

3. Basis for establishing interim operation justification: Failure mode and effects analysis (FMEA) will be required to confirm interim operation justification unless MP&L can demonstrate through LOCA testing that the component is not expected to fail.
4. Electrical Interface Components:  
MP&L should have interim operation justified by audit time, or a plan to obtain. If LOCA testing is to be performed prior to fuel load to demonstrate interim operation justification, then FMEA is not required. If LOCA testing will be completed after fuel load, or if testing does not demonstrate operability under a LOCA, then FMAE is required prior to fuel load.
5. Qualified life calculations:  
Any analysis which demonstrates very limited qualified life (due to conservative assignment of activation energies) should be supplemented with additional analysis. The NRC staff does not want to find stand alone calculations which demonstrate a qualified life of 27 days, etc.

The additional analysis should compare the material to another material of similar characteristics (resiliency, elongations, etc.) with a known activation energy, and then a more realistic qualified life should be assigned.