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subject block



MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

March 23 1983

JAMES P. McGAUGHY, JR.
ASSISTANT VICE PRESIDENT

Mr. J. P. O'Reilly
Regional Administrator
Office of Inspection & Enforcement
Region II
101 Marietta Street, N.W.
Suite 3100
Atlanta, Georgia 30303

Attention: Mr. J. P. O'Reilly, Regional Administrator

Dear Mr. O'Reilly:

SUBJECT: Grand Gulf Nuclear Station
Units 1 and 2
License No. NPF-13
Docket Nos. 50-416/417
File: 0260/15521
Response to SALP Report
(No. 50-416/82-45)
AECM-83/0149

Your letter dated February 3, 1983, transmitted to us the Systematic Assessment of Licensee Performance (SALP) report for the Grand Gulf Nuclear Station (GGNS) Unit 1 facility for the period July 1, 1981 through August 30, 1982. On February 10, 1983, members of our staff and our Safety Review Committee met with you and members of your staff to review the results of the report. Mississippi Power & Light Company (MP&L) is responding to that report via this letter and other information to be presented to you in March, 1983.

MP&L endorses the SALP concept and believes that objective evaluations of licensee performance benefit the licensee, the NRC, and the public by identifying and focusing attention and resources on the matters that NRC perceives as most important to safety of plant operations. We are committed to operating GGNS safely and in accordance with all applicable regulations. Accordingly, we intend to be responsive to the conclusions and recommendations discussed in your report.

MP&L believes that a candid and cooperative relationship should exist between the NRC and its licensees in order to promote the free interchange of information necessary to facilitate the regulatory process and enhance nuclear safety. We feel that we have this sort of relationship with your office and intend to maintain the spirit of cooperation that has characterized our dealings in the past. The commitments we made to you during our meeting of January 17, 1983, are evidence of our willingness to recognize and correct any of our activities that need improvement. Further, we are developing plans to upgrade our performance in several key activities at GGNS and intend to submit to you in March, 1983, a comprehensive report which defines these plans and programs.

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MISSISSIPPI POWER & LIGHT COMPANY

The following is a section by section response to the findings of your SALP report:

1. Plant Operations and Operational Preparation

MP&L recognizes that additional management attention is needed and will substantially address this area in its March, 1983 report to NRC.

2. Preoperational and Surveillance Testing

MP&L recognizes that additional management attention is needed and will substantially address this area in its March, 1983 report.

3. Plant Security and Safeguards

MP&L believes this area is now functioning in an acceptable and effective manner, including the security computer system.

4. Radiological Controls

MP&L has no comments on this section.

5. Operational Quality Assurance (QA) Program

The March, 1983 report will address the comment dealing with unresolved items not receiving attention until escalation to violation status.

6. Emergency Preparedness

The item dealing with personnel accountability was closed as a result of a full site accountability drill conducted on December 29, 1982. The other deficiencies deal with plant systems which are not required to be operational prior to exceeding 5% thermal power.

7. Soils and Foundations

Not rated.

8. Containment and Other Safety Related Structures

Not rated.

9. Piping Systems and Supports

The "600 discrepancies" in the CRDM piping system does not accurately reflect the results of the walkdown, in that, it was really 600 observations that required evaluation. Of the 600, approximately 140 were determined to be valid discrepancies and only about one-half of those required hardware changes.

MISSISSIPPI POWER & LIGHT COMPANY

10. Safety Related Components

Not rated.

11. Support Systems

Substantial progress has been made since the end of the report period in closing the unresolved items, and additional resources have been made available to the fire protection coordinator to assist him in adequately administering the program.

12. Electrical Power Supply and Distribution

MP&L has no comments on this section.

13. Instrumentation and Control Systems

MP&L has no comments on this section.

14. Licensing Activities

MP&L feels that the comments pertaining to occasionally marginal quality, lack of depth, lack of timeliness, and repeated attempts to secure information of licensing submittals are unwarranted and not supported by the record of our dealings with NRR.

15. Construction Quality Assurance (QA) Program

MP&L has no comments on this section.

In addition to the above comments, we feel that three other items in the SALP report warrant comment and clarification:

1. The GGNS Unit 1 Low Power Operating License was issued on June 16, 1982 versus June 12, 1982 as stated in your report.
2. The February 19, 1982 meeting is discussed as an "enforcement meeting." This terminology leads us to believe that you consider this meeting to have been an "enforcement conference" as defined in 10 CFR 2, Appendix C. MP&L believes this was not the case and your letters of February 16, 1982 and March 1, 1982, concerning the meeting do not contain the term "enforcement."
3. The October 14, 1982 meeting is discussed as an "enforcement conference." This meeting was not represented to MP&L at the time as an enforcement conference and your letters of October 8, 1982 and October 20, 1982, concerning the meeting do not represent it as such.

MISSISSIPPI POWER & LIGHT COMPANY

We appreciate the efforts of you and your staff in helping us identify areas where we may need to improve our operations. If you have any questions or comments concerning this response, please let me know and we shall be happy to discuss them with you.

Yours truly,



for J.P. McGaughey

JPM:rg

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

Mr. Richard C. DeYoung, Director
Office of Inspection & Enforcement
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555



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March 27 1983 3:57
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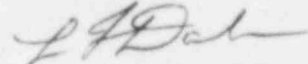
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