



MISSISSIPPI POWER & LIGHT COMPANY

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October 1, 1982

JAMES P. McGAUGHY, JR.
ASSISTANT VICE PRESIDENT

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, 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 0260/15525/15525
PRD-81/44, Interim Report No. 6, Valves And Actuators Not
Manufactured Under A QA
Program
AECM-82/433

- References:
- 1) AECM-82/279, 6/15/82
 - 2) AECM-82/177, 4/20/82
 - 3) AECM-82/97, 3/15/82
 - 4) AECM-82/45, 1/29/82
 - 5) AECM-81/470, 11/30/81

On October 29, 1981, Mississippi Power & Light Company notified Mr. P. A. Taylor, of your office, of a Potentially Reportable Deficiency (PRD) at the Grand Gulf Nuclear Station (GGNS) construction site. Originally, the investigation was concerned only with unqualified Bettis Air Actuators on Henry Pratt Valves.

As previously stated, we have completed our investigation for these type valves and actuators and have determined that it is not reportable under the provisions of 10CFR50.55(e). We also investigated the possibility that other type valve actuators and appurtenances may not have been manufactured under a QA program.

The investigation for the BOP scope of supply has been completed. Although some of the actuators and appurtenances were not manufactured under a QA program, they have been qualified by tests and/or analyses and do not represent a reportable deficiency under 10CFR50.55(e). All details are given in our attached report.

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Mr. J. P. O'Reilly
NRC

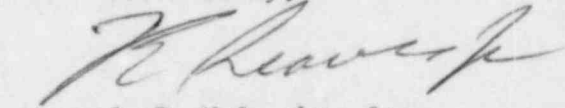
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We are continuing our investigation of valve appurtenances for the NSSS scope of supply.

This report was originally due on September 24, 1982. However, a one week extension was granted by Mr. R. Butcher on that date.

A Final Report will be submitted by March 31, 1983.

Yours truly,


for I. P. McGaughy, Jr.

KDS:dr
ATTACHMENT

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

Mr. Richard C. DeYoung, Director
Office of Inspection & Enforcement
U. S. Nuclear Regulatory Commission
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Mr. G. B. Taylor
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Hattiesburg, MS 39401

INTERIM REPORT NO. 6 FOR PRD-81/44

I. Description of the Deficiency

This deficiency was originally reported because Bettis Air Actuators on Henry Pratt valves were not typical of the units used for original qualification testing. Upon investigation it was determined that the actuators had not been built under a QA program.

An investigation, including seismic qualification tests, component size and configuration inspection, and material evaluation was conducted. Based on the results of this investigation, it was concluded that the manufacture of the Bettis actuators without a QA program would not affect the safety of operations of the nuclear power plant and is not reportable under the provisions of 10CFR50.55(e).

MP&L expanded the scope of this PRD to include any other actuators and valve appurtenances that may have been manufactured without a QA program. An investigative plan was formulated for looking at this deficiency on other valves and appurtenances at Grand Gulf Nuclear Station.

The investigative plan consisted of the following:

- 1) A review and assessment was conducted of the current quality requirements in technical specifications to ensure quality requirements applicable to actuators and other valve appurtenance were clearly delineated.
- 2) The valve supplier's project approved QA programs were reviewed to determine the applicability of these programs to actuators and other valve appurtenances.
- 3) Previous audits of these valve suppliers performed by our Architect/Engineer were reviewed to ascertain the implementation of the programs, as they pertain to actuators and other valve appurtenances.
- 4) Past Procurement Surveillance Reports by our Architect/Engineer were reviewed to determine the appropriate time frame for either procurement or production of active actuators.

This investigation was to determine the following for valves supplied for both the Nuclear Steam Supply System and Balance of Plant systems.

- 1) Had QA programs been implemented by vendors during the manufacturing of not only valve actuators but also other valve appurtenances.
- 2) If actuators and other valve appurtenances had not been manufactured under a quality assurance program, what was their degree of acceptability?

II. Analysis of Safety Implications

The potential exists for the valves to fail to function under seismic and environmental conditions.

Our investigations into each of the valve/valve appurtenance problems were conducted by tests, analyses, and review of vendor documents and program requirements. Emphasis was placed on the traditional problem areas such as material control, special processes, and non-code parts. In the Balance of Plant systems any questions were resolved satisfactorily where safety impacts were a consideration.

Our investigation into the NSSS scope of supply is continuing.

Since all of the valve appurtenances were found to be qualified either by test, analysis, or other means this deficiency is not reportable under the provisions of 10CFR50.55(e)

Although it has been determined that failure of the Bettis Actuators due to degradation of the internals would not affect safety, MP&L has elected to upgrade the seals, lubricants, and coating on the pins and rollers.

III. Corrective Actions Taken

MP&L was asked to show why this PRD and PRD-82/32 were separate problems. Although some of the same valves and actuators were included in both PRD's the main difference is that this PRD involved a program deficiency in that proper controls were not placed on all of the valve supplier's and sub-suppliers. PRD-82/32 involved a hardware design problem. Sufficient strength through the thickness of the yoke at the bottom of the keyway was not provided.

Details of PRD-82/32 are given in our Final Report which was AECM-82/313, July 9, 1982.