



**Entergy
Operations**

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U.S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29
Report No. 50-416/91-07-01
Dated 04/29/91 (GNRI-91/00089)

GNRO-91/00087

Gentlemen:

Entergy Operations, Inc. hereby submits the response to Notice of Violation 50-416/91-07-01.

Yours truly,

WTC/RR/cg

attachment: Notice of Violation 50-416/91-07-01

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Notice of Violation 91-07-01

Technical Specification 6.8.1.c requires that written procedures be established, implemented, and maintained covering activities associated with surveillance and test activities of safety related equipment. Administrative Procedure, 01-S-06-12, GGNS Surveillance Program, Section 6.8 required the test performer to make the initial review of the test results. Section 6.8.6 required the shift superintendent/supervisor perform a review, and Section 6.8.9 required the superintendent's designee to perform a review of the test result for technical accuracy.

Contrary to the above, on February 13, 1991, the operator performing (NOA) the LPCI/RHR quarterly functional test failed to adequately review the test package. In addition, the shift supervisor and superintendent performed an inadequate review in that the results of the ISI portion of the test were incorrectly classified as acceptable when the test should have been determined unacceptable.

I. Admission or Denial of the Alleged Violation

Entergy Operations, Inc. admits to this violation.

II. The Reason for the Violation, If Admitted

Entergy Operations personnel transcribed incorrect data into a functional test data package, which was used to calculate inservice inspection (ISI) data. The subsequent reviews of the completed surveillance did not identify the erroneous data.

Upon completion of the test, the test results (i.e., acceptable, unacceptable) are recorded on the Surveillance Procedure Data Package Cover Sheet. The procedure did not require each data entry to be verified for accuracy. Therefore, only the calculated data would be reviewed to ensure ISI criteria were met. The accuracy of the ISI data entries was only reviewed by the ISI Coordinator, after the fact.

Additionally, the format of the procedure required the test performer to transpose data between pages within the surveillance data package.

III. The Corrective Steps Which Have been Taken and the Results Achieved

- A. A Quality Deficiency Report was initiated to document the deficiency and the 'B' Residual Heat Removal Pump was declared inoperable. The ISI portion of the surveillance which verifies that the ISI criteria are met was successfully completed on February 19, 1991.

- B. An evaluation was performed to determine if the pump actually failed to meet ISI criteria during the previous test. Based on the evaluation, the ISI calculated value data point exhibited less deviation from the manufacturer's pump curve than the previous surveillance test. Therefore, the pump was considered operable as a result of the surveillance, even though the data may not have exactly met the ISI acceptable ranges.
- C. A Human Performance Evaluation (HPE) identified several ISI Surveillance procedures which may be subject to errors due to transposition of data between pages.

IV. The Corrective Steps Which Will Be Taken To Preclude Further Violation

- A. Surveillance Procedure 06-OP-1E12-Q-0024 will be changed to eliminate the transposition of data between pages. The surveillance will also be revised to require licensed operators to review data entries for accuracy upon completion of the test.
- B. A review will be performed to determine if procedure revisions are necessary for ISI Surveillance procedures identified during the HPE.

V. Date When Full Compliance Will Be Achieved

Full compliance will be achieved by July 1, 1991.