



MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

NUCLEAR PRODUCTION DEPARTMENT

January 26, 1984

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

Attention: Mr. P. C. DeYoung, Director

Dear Mr. DeYoung,

SUBJECT: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-13
File: 0260/15525/15526
I.E. Report 50-416/83-43 of
August 21 - September 22,
1983 and 50-416/83-56 of
November 10 - December 13, 1983
AECM-84/0062

Reference: MAEC-83/0402, December 21, 1983
MAEC-84/0005, January 9, 1984

This letter provides our response to Notices of Violation 83-43-01, 02, and 03. The extension of the date for this response was discussed with Mr. Caudle Julian and Mr. Dave Verrelli of the NRC Region II office.

The Proposed Imposition of Civil Penalty (EA-83-133) has been reviewed and MP&L has decided to pay the penalty. Payment of the proposed penalty is included with this transmittal.

The request of January 9, 1983 to incorporate the responses to IR 83-56 into this document was received only fifteen days ago. Those responses (83-56-01,02,03,04) are being developed and will be forwarded as a supplement to this document per discussion of January 24, 1983 with Mr. Dave Verrelli of Region II.

Yours truly,

L. F. Dale
Manager of Nuclear Services

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PDR ADOCK 05000416
G PDR

PRH:scb

DESIGNATED ORIGINAL

Certified By Ray Lick

bcc: Mr. A. Zaccaria, w/o
 Mr. R. W. Jackson, w/a
 Mr. C. D. Wood, w/o
 Mr. J. F. Hudson, Jr., w/o
 Mr. T. H. Cloninger, w/a
 Mr. J. P. McGaughy, w/o
 Mr. T. E. Reaves, w/o
 Mr. J. E. Cross, w/a
 Mr. S. M. Feith, w/a
 Mr. A. R. Smith, w/c
 Mr. A. G. Wagner, w/a
 Mr. C. C. Hayes, w/a
 Mr. M. D. Houston, w/a
 Mr. J. F. Pinto, w/a
 Mr. M. D. Archdeacon, w/a
 Mr. L. F. Dale, w/a
 Mr. A. C. Pearson, w/a
 Mr. A. S. McCurdy, w/o
 Mr. P. J. Richardson, w/a
 Mr. P. R. Hughes, w/a
 Mr. J. G. Cesare, w/a
 SRC Secretary, w/a
 Middle South Services Nuclear Activities, w/a
 File (LCTS), w/a
 File (Plant), w/a
 File (Project), w/a [10]

Enclosure
Attachments

cc: Mr. J. B. Richard, w/a
Mr. R. B. McGehee, w/a
Mr. T. B. Conner, w/a
Mr. G. B. Taylor, w/a

Mr. J. P. O'Reilly, Regional Administrator, w/a
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Region II
101 Marietta St., N.W., Suite 2900
Atlanta, Georgia 30303

VIOLATION
50-416/ 83-43-01

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Mississippi Power & Light admits to the alleged violation.

II. THE REASONS FOR THE VIOLATION IF ADMITTED

On Sept. 12, 1983, Mechanical Maintenance attempted to jack the Division I Diesel Generator (DG) crankshaft over 180 degrees for generator inspection utilizing a permanently installed cylinder and piston device and powering it by plant air. The force from the jack utilizing plant air at approximately 100 PSIG was insufficient to move the shaft. While trying to determine how to jack this DG shaft over, the Mechanical Superintendent recalled that the DG starting air pressure was considerably higher than plant air pressure so he thought he might be able to use it instead of plant air. Division II DG starting air was in service.

The Mechanical Superintendent requested the Nuclear Support Manager, who was in the area at the time and was going to the Shift Superintendent's Office on another matter, to check with the Shift Superintendent on the use of Division II DG starting air to jack the Division I DG over for inspection.

The Nuclear Support Manager considered the inquiry not to be a direct request, but more of a casual questioning from the Mechanical Superintendent. The Nuclear Support Manager then told the Mechanical Superintendent he would mention to the Shift Superintendent that the Mechanical Superintendent would be asking about the service air use.

The Nuclear Support Manager asked the Shift Superintendent if he would allow the use of Division II DG starting air to jack the Division I DG over and the Shift Superintendent refused. The Nuclear Support Manager did not take his inquiry to be anything more than informal and thought that the Mechanical Superintendent would be asking for himself when he was ready. He therefore, did not give the Mechanical Superintendent any feedback.

The Mechanical Superintendent then directed the Mechanical Supervisor to make ready the connections and went to his office.

The Mechanical Supervisor, following the Mechanical Superintendent's directions, made ready and hooked up the hose to a Division II DG starting air receiver connection and used Division II DG starting air to jack Division I DG crankshaft approximately 180 degrees.

CONCLUSIONS:

- ° An administrative control system breakdown occurred.
- ° The breakdown resulted from intensive schedule pressure, poor communications, and lack of regard for or attention to procedures by certain personnel.

III. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

On September 13, 1983, the Operations Shift Superintendent was informed of the temporary connection that was made without proper reviews, authorizations, and documentation from the Division II DG starting air system to the Division I DG barring device. The Shift Superintendent immediately directed Maintenance to remove the connection and issued Plant Quality Deficiency Report No. 099-83.

The connection was removed, the Mechanical Superintendent and Supervisor were counseled, and the PQDR dispositioned.

IV. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATION

MP&L executive management verbally reiterated the seriousness of failing to follow procedures to Plant Management.

The Mechanical Superintendent was given a written reprimand for his actions contributing directly to the procedure breakdown.

Line managers and superintendents were verbally instructed to give prompt feedback on important information and to avoid giving the impression of sanctioning or condoning unauthorized actions to expedite work accomplishments.

The Mechanical Superintendent and Mechanical Supervisor involved in the incident have been counseled and are aware of the proper procedures for performing temporary alterations. A memo was issued to plant personnel emphasizing the importance of following the "Temp Alt" procedure.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

MP&L has achieved full compliance.

VIOLATION
50-416/ 83-43-02

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Mississippi Power & Light admits to the alleged violation.

II. THE REASONS FOR THE VIOLATION IF ADMITTED

After the fire on Sept. 4, 1983, no physical work was performed on the Diesel Generator (DG) that could have destroyed evidence; therefore invalidating warranty and/or insurance claims. Following the initial inspection by the Delaval and the insurance company representatives, the DG was released for work on Sept. 6, 1983.

Due to the scope of the restoration work included and the time involved to process the necessary work documents, very little physical work was in progress. Upon the Plant Manager's tour of the damaged area, concerns were then generated about what impact this lack of physical work would have on the extremely urgent restoration schedule. This concern was then expressed to his subordinates. To resolve the above concerns, the Maintenance Superintendent and the Mechanical Superintendent discussed ways to speed up the paperwork which was causing delays in starting some of the physical work. One of the ways discussed was the possibility of changing the Releasing Organization from Operations to Maintenance for the work activities in the Division I DG isolated block of work for the fire restoration action.

The Maintenance Superintendent then asked the Operations Superintendent if the change in the Releasing Organization could be done. The operations Superintendent replied that it could not be done citing both the Administrative Procedure and FSAR. The Maintenance Superintendent then failed to get this word back to the Mechanical Superintendent.

Later in the day the Mechanical Supervisor, serving as an assistant to the Mechanical Superintendent, understood it to be all right for Maintenance to be the Releasing Organization for those MWO's in the Division I DG isolated area through discussions with the Maintenance Superintendent. This mechanical supervisor then discussed the Releasing Organization change with Maintenance Planners and a Maintenance Engineer. They then changed the Releasing Organization from Operations to Maintenance on several MWO's.

CONCLUSION:

- ° An administrative control system breakdown occurred
- ° The breakdown resulted from intensive schedule pressure, poor communications, and lack of regard for or attention to procedures by certain personnel.

III. THE CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

On Sept. 8, 1983 the Releasing Organization problem was brought to the attention of a Plant Quality Representative by two Supervisory level persons (one from Maintenance and one from Operations). The Maintenance Representative gave Plant Quality a PQDR form (see response 83-43-03) identifying seven mechanical MWO's known to have the incorrect Releasing Organization.

A total of twelve mechanical MWO's were discovered to have the incorrect Releasing Organization signature.

Of the twelve:

- ° Five were corrected on Sept. 8, 1983
- ° Two were corrected on Sept. 8, 1983
- ° Four were corrected on Sept. 9, 1983
- ° One was corrected on Jan. 23, 1984

IV. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

The Administrative Procedure controlling release to work was revised to clarify what specific equipment can be released by organizations other than operations.

A memo was written to the Mechanical Superintendent and the Mechanical Supervisor assisting them on the proper actions of identifying who is responsible for releasing equipment to the plant. A memo was issued to plant personnel emphasizing the importance of following the "Control of Work" procedure.

V. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

MP&L has achieved full compliance.

VIOLATION
50-416/83-43-03

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Mississippi Power and Light Company (MP&L) admits to the alleged violation. Even though MP&L admits to the violation, there were no adverse affects on the health and safety of the public.

II. REASON FOR THE VIOLATION

The PQDR was brought to the attention of the Plant Quality Section on September 8, 1983. An inspector was dispatched to the field not with the intent to correct the deficiencies, but to determine the extent of the identified deficiencies. This research was necessary to determine if immediate corrective action or interim controls were required.

When the inspector reached the diesel bay area, he discovered immediate corrective action already in process by Maintenance & Maintenance Engineering. A review was being performed to determine which MWO's had the incorrect releasing organization. As these MWO's were found they were returned to the Operations Department for the correct release. The Plant Quality inspector aided in the review not with the intent of providing the corrective action, but under the impression that he was determining the extent of the problem and verifying that the immediate action taken by Engineering and Maintenance had in fact corrected all the nonconforming MWO's. Any MWO's discovered during his review were identified to Maintenance and Maintenance Engineering for corrective action.

The PQDR was not immediately assigned a number and processed to the responsible organization for the following reasons:

- (1) Plant Management, in an effort to establish more timely responses to PQDR's, had suggested that Plant Quality hold meetings between the responsible organizations to discuss the extent of the nonconformance, corrective action and remedial corrective action.
- (2) The PQDR procedure did not specify when a number must be assigned to the PQDR. At the time of the alleged violation numbers were routinely assigned after the deficiency meeting with the responsible section.
- (3) The PQDR procedure did not specify that immediate corrective actions must be documented on the PQDR.
- (4) Plant Quality believed the immediate corrective action had corrected all active MWO's.

III. CORRECTIVE ACTIONS TAKEN AND THE RESULTS ACHIEVED

PQDR 097-83 was issued on September 9, 1983, to responsible supervision.

Plant Quality performed a review of 140 MWOs associated with the diesel rework. Listed below are the results of that review:

- (1) One hundred twenty-eight MWOs were found to have the proper releasing organization.
- (2) Twelve MWOs were found not to have the proper releasing organization.
 - (A) Of these twelve, five were found to be corrected on Sept. 9, 1983.

M39294	M39329
M39295	M39330
M39302	

- (B) Two were corrected on Sept. 7, 1983 before the problem was documented on the PQDR.

M39296	M39297
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- (C) Four were found to be completed on Sept. 8, 1983 prior to problem identification. These were corrected on Sept. 9, 1983.

M39289	M39291
M39290	M39293

- (D) MWO M39292 was thought to have been properly corrected, but the signature was later determined to be that of a Maintenance Supervisor. This MWO was reviewed after the fact by Operations and corrected.

IV. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATION

Administrative Procedure 01-S-03-2, "Plant Quality Deficiency Report", will be revised to reflect the following:

- (1) Upon receipt of a PQDR by Plant Quality, a sequential number will be assigned and logged by Plant Quality.
- (2) Any immediate corrective actions taken will be documented on the PQDR.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance will be achieved by February 7, 1984.