



MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

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NUCLEAR PRODUCTION DEPARTMENT

September 26, 1983

U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, N. W., Suite 2900
Atlanta, Georgia 30303

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

Dear Mr. O'Reilly:

SUBJECT: Grand Gulf Nuclear Station
Unit 1
License No. NPF-13
Docket No. 50-416
File: 0260/15525/15526
I.E. Report 416/83-35 of
July 17, 1983 - August 8,
1983
AECM-83/0612

References: MAEC-83/0271, dated August 26, 1983

This letter provides our response to NRC Violations 416/83-35-01 and 416/83-35-08 transmitted by your letter dated August 26, 1983. Violation 416/83-35-03 is not addressed since we have been informed by A. G. Wagner that it is being withdrawn.

Yours truly,

L. F. Dale
Manager of Nuclear Services

Attachment

PRH:aly

cc: Mr. J. B. Richard (w/o)
Mr. R. B. McGehee (w/o)
Mr. T. B. Conner (w/o)
Mr. G. B. Taylor (w/o)

Mr. Richard C. DeYoung, Director (w/o)
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

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Member Middle South Utilities System

VIOLATIONS 83-35-01

I. Admission or Denial of the Alleged Violation.

Mississippi Power & Light Company admits to the violation as stated. There were no effects on the health and safety of the public.

II. Reasons for the Violation.

All of the inadequacies cited were from old evaluations which were performed prior to MP&L's implementation of an improved 10CFR50.59 program.

III. Corrective Steps Which Have Been Taken And The Results Achieved.

Additional justification has been provided to the PSRC for questions (ii) and (iii) of the safety evaluation for the specific temporary alteration, 810113. The safety evaluation was then reviewed and approved by the PSRC. No unreviewed safety questions were identified.

IV. Corrective Steps Which Will Be Taken To Avoid Further Violations.

A special subcommittee will be appointed from within the Plant Safety Review Committee which will review all safety evaluations performed on active temporary alterations issued prior to implementation of Plant Staff's Administrative Procedure 01-S-06-24, "Safety and Environmental Evaluations". Safety evaluations found which do not provide adequate justification for the conclusion reached will be re-written or supplemented, as appropriate.

V. Date When Full Compliance Will Be Achieved.

Full compliance will be achieved by November 14, 1983.

VIOLATION 83-35-08

MP&L denies the alleged violation as stated.

MP&L Policy and Organization Manual (POM) Procedure 9.2, Safety Review Committee (SRC), was issued on June 8, 1982. Section 5.1.3 of that procedure addresses "Alternates" by referencing the Technical Specifications, Section 6.5.2. Although POM Procedure 9.2 does not specifically delineate the method and duration of the appointment of alternates it does recognize, by reference, the requirements in the Technical Specifications.

The MP&L Operational Quality Assurance Manual (MPL-TOP-1), Section 5.5.1 states that "...procedures... appropriate to the circumstances shall be used...". It is felt that Procedure 9.2 does not need detailed instructions for the appointment of alternates because that depth of detail is not appropriate for the importance of the activity. Additionally, each alternate who has served in a committee meeting was appointed in writing by the SRC Chairman (or Alternate Chairman in the Chairman's absence) or the higher-tier authority (Sr. Vice President - Nuclear) to whom the SRC reports. Typically, the appointment by the Chairman is via his signature on the minutes of the first meeting in which the alternate served and his participation acknowledged.

The members of the SRC are appointed by title as specified in Technical Specification, Section 6.5.2.2. By virtue of this mechanism they are considered permanent members of the SRC so long as they serve in the organizational position which occupies a seat on the Committee. The alternates are appointed by name and are "temporary" to the extent that a permanent member may appoint a different alternate whenever the need arises. MP&L feels that it is not "appropriate to the circumstances" to specify a duration of the appointment so long as the alternate is competent and available to serve temporarily in the absence of the permanent member.

In summary, MP&L believes that no violation exists since 1) its procedures do address the appointment of alternates and 2) it has not failed to comply with the provisions of the Tech Specs which address this activity.