



MISSISSIPPI POWER & LIGHT COMPANY

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P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

October 7, 1983 16 AIO: 38

NUCLEAR PRODUCTION DEPARTMENT

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

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

Dear Mr. O'Reilly:

SUBJECT: Grand Gulf Nuclear Station  
Unit 1  
Docket No. 50-416  
File 0260/15525/15526  
I. E. Report 50-416/83-25,  
Supplemental Response  
AECM-83/0579

Reference: 1. MAEC-83/0221, dated July 20, 1983  
2. AECM-83/0533, dated August 29, 1983

Reference 1 transmitted to Mississippi Power & Light Co. (MP&L) the subject report. Reference 2 was MP&L's response to Notice of Deviation 416/83-25-01 and Notice of Violation 416/83-25-02, which were contained in the report.

In its response MP&L denied Notice of Violation 416/83-25-02 and stated the reasons why MP&L believes there were insufficient grounds to support its issuance. As a result of discussions on September 7, 1983 with Mr. Al Wagner of NRC, MP&L wishes to submit additional information concerning this alleged violation.

MP&L feels this alleged violation arose due to differences in interpretation of MP&L's response to Notice of Deviation 416/82-78-02. As stated in Reference 2 MP&L never intended that the portions of its Operations Enhancement Program (OEP) dealing with the Licensing Commitment Tracking System (LCTS) would be complete by April 15, 1983. Consequently, MP&L did not consider itself committed to this date. However, MP&L's response to Notice of Deviation 416/82-78-02 is worded in such a way that it can be interpreted in this manner, and, in fact, that is the way the NRC interpreted the commitment.

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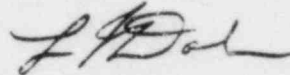
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The administrative controls for maintenance, implementation and use of the LCTS were in place prior to "Next Criticality", so that OEP Action Item 4.1.4 was completed in accordance with its commitment date.

In summary, MP&L believes the crux of this issue was MP&L's inadvertent mis-wording of its response to the previous notice of deviation and NRC's subsequent mis-interpretation of MP&L's intent. MP&L admits its culpability in imprecisely wording the response to Notice of Deviation 416/82-78-02. However, NRC's interpretation of the response was a matter beyond MP&L's control and in MP&L's opinion should not be grounds for a notice of violation.

MP&L requests that NRC consider the circumstances that led to the interpretational differences and recognize that MP&L worked in good faith and met its perceived commitment. Accordingly, MP&L further requests that NRC reconsider its position and withdraw this notice of violation.

Yours truly,



L. F. Dale  
Manager of Nuclear Services

LFD:jh

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

Mr. Richard C. DeYoung, Director (w/a)  
Office of Inspection & Enforcement  
U. S. Nuclear Regulatory Commission  
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