



MISSISSIPPI POWER & LIGHT COMPANY

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P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

NUCLEAR PRODUCTION DEPARTMENT

August 29, 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
IE Report 30-416/83-25 of
May 23 - June 15, 1983
AECM-83/0533

Reference: MAEC-83/0221, dated July 20, 1983.

This letter provides Mississippi Power & Light Company's (MP&L) response to Notice of Violation 416/83-25-02 and Notice of Deviation 416/83-25-01 contained in the subject report. The date for response to this Inspection Report was verbally extended to August 29, 1983, by Mr. Dave Verrelli of your office.

MP&L recognizes the importance of tracking and meeting its commitments to NRC and, in general, admits to the facts upon which the alleged violation and deviation are based. However, MP&L believes there are insufficient grounds for issuance of the notice of violation and accordingly, denies Notice of Violation 416/83-25-02.

10CFR50, Appendix B, Criterion XVI, requires that measures "...be established to assure that conditions adverse to quality... are promptly identified and corrected." MP&L established the I&E TRACK subsystem of its Commitment Tracking System (CTS), previously called LCTS, to track commitments to your office in response to inspector identified items. MP&L's commitment in its Operations Enhancement Program (OEP), Action Item 4.1.4, Task 7, is that administrative controls for maintenance, implementation and use of CTS would be in place prior to next criticality. Those administrative controls are now in place but were not at the time this alleged violation was identified. Additionally, "next criticality" has not yet been achieved. Therefore, MP&L believes that at the time of the alleged violation the commitment date had not yet arrived, and it is not in violation of 10CFR50, Appendix B.

In response to Inspection Report 416/82-78, MP&L stated that the OEP described actions being taken to avoid further deviations. The third paragraph of response to Notice of Deviation 416/82-78-02 stated that

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corrective actions were to be completed by April 15, 1983. MP&L's intent, which we believe was evident in the response, was that the corrective actions discussed in the first paragraph of that response would be complete by April 15, 1983. The reference to the OEP in the second paragraph was included only as additional information, and it was never contemplated or intended that the individually established commitment dates in the OEP would be revised on a blanket basis to April 15, 1983.

The basis for the deviation is MP&L's failure to meet a commitment date for revising an administrative procedure. The basis for the violation, notwithstanding the issue of effective commitment date for operation of CTS, is that the CTS did not preclude repetition of a previously identified deviation, and therefore, that adequate corrective actions had not been established, thus violating 10CFR50, Appendix B, Criterion XVI. MP&L believes that if the grounds supporting the notice of violation are deemed valid, then MP&L is in the illogical position of being vulnerable to a notice of deviation and a notice of violation each time a commitment date being tracked by the CTS is not met. We feel this situation is unreasonable and that failure to meet an individual commitment should be appropriately reflected by a notice of deviation only.

MP&L's response to Notice of Deviation 416/83-25-01 is included as an attachment to this letter.

Yours truly,



L. F. Dale
Manager of Nuclear Services

PRH/JPM:ay

Attachment

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

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

NOTICE OF DEVIATION 416/83-25-01

CORRECTIVE ACTIONS WHICH HAVE BEEN TAKEN

TCN #10 to Administrative Procedure 01-S-06-1 has been issued to clarify the definition of safety-related equipment and components. This TCN will be incorporated into the next revision to the procedure.

CORRECTIVE ACTIONS WHICH WILL BE TAKEN TO AVOID FURTHER DEVIATIONS

The "Compliance Due Date" data column of I&E TRACK will be utilized as a management tool to help assure that commitments are completed in a timely manner. Nuclear Services procedures have been issued and will control the use of the CTS and its subsystems. These procedures require management attention to commitment due dates and define actions necessary to ensure they are met (or extended, if necessary).

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance is in effect for the specific activity which led to this Deviation, i.e. failure to revise Administrative Procedure 01-S-06-1.

Full compliance is in effect for the establishment of administrative controls necessary to implement and use the CTS, in that, NSAP procedures have recently been issued. However, very little experience has been accrued utilizing these procedures, due to their recent issue date.