



MISSISSIPPI POWER & LIGHT COMPANY

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P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

December 7, 1983

NUCLEAR PRODUCTION DEPARTMENT

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
Docket No. 50-416
License No. NPF-13
File 0260/15525/15526
Potentially Reportable
Deficiency 80/56 and 82/13
AECM-83/0747

REFERENCES: 1) Letter from J. P. O'Reilly to J. B. Richard, dated October 25, 1983.
2) Letter from J. C. Millett (RCI) to E. L. Jordan (NRC), dated September 15, 1983.

In response to your October 25, 1983, letter (Reference 1), Mississippi Power & Light (MP&L) has completed a review of Reactor Controls Incorporated's (RCI) letter to the Nuclear Regulatory Commission (NRC) (Reference 2). As requested, MP&L is providing the following comments to this letter as it relates to RCI's construction activities at Grand Gulf Nuclear Station (GGNS) and in particular as it relates to MP&L's Potentially Reportable Deficiency (PRD) reports 80/56 and 82/13. The NRC requested in its letter that MP&L provide its comments to them by November 27, 1983. However, extensions to this date were granted via telephone conversions with Ms. Linda Watson on November 22, 1983, and Mr. David Verrelli on November 30, 1983. It was agreed that MP&L would provide its response to the NRC by December 7, 1983.

The following deficiencies were identified by PRD-80/56 which was initiated by MP&L on September 12, 1980:

- a) Installed pipe supports deviated from approved design drawings.
- b) RCI's QA program did not provide a method of documenting, controlling and approving the deviations from design drawings.

The deficiencies described in PRD-80/56 concerned work performed by RCI at GGNS prior to August 21, 1980. In its response to the NRC (Reference 2), RCI addressed only work that was performed following the issuance of the PRD. Also in this response, RCI discusses the use of Engineering Change Notices (ECN's) to record deviations from drawings; however, ECN's were not a part of RCI's GGNS Quality Assurance (QA) program until Addendum GG-2, Revision 4 was

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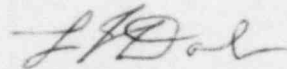
incorporated into the RCI QA manual on December 11, 1980. This action was initiated after the issuance of PRD-80/56 on September 12, 1980. It is our opinion that RCI in its response to the NRC did not address the issues raised by MP&L and PRD-80/56, primarily because the actions described as being taken by RCI in its response are inapplicable in that they were taken by RCI subsequent to the time when the deficiencies reported to the NRC in PRD-80/56 were discovered.

MP&L's PRD-82/13 was initiated on March 17, 1982, and identified supports installed and accepted by RCI that were not in accordance with approved design requirements as a potentially reportable deficiency. The cause of the deficiency was reported as a failure on the part of RCI to follow the requirements of their approved QA program.

RCI stated in their September 15, 1983 letter that all work described in PRD-82/13 was performed in accordance with their approved QA program. However, the deficiencies noted in PRD-82/13 were found during a RCI reinspection of supports which were installed and previously accepted by RCI. As a result of the deficiencies, RCI issued QC holds on the installed pipe supports. Since the deficiencies were identified on supports already accepted, RCI had not performed the work in accordance with their QA program. RCI's QC program if correctly implemented would have resulted in ECN's or nonconformance documents being generated to document the support deviations from design drawings.

Based on a complete review of the RCI September 15, 1983 letter to the NRC and PRD's 80/56 and 82/13, it has been concluded by MP&L that no changes to the original PRD's are warranted. If you have any further questions or would like for us to address any specific issue raised by RCI in its response to the NRC, please do not hesitate to contact us.

Yours truly,



L. F. Dale
Manager of Nuclear Services

WKH/SHH:sap

cc: Mr. J. B. Richard
Mr. R. B. McGehee
Mr. T. B. Conner
Mr. G. B. Taylor

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