



ENTERGY

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Grand Gulf Nuclear Station

May 24, 1995

U.S. Nuclear Regulatory Commission
Mail Station P1-37
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Grand Gulf Nuclear Station
Docket No. 50-416
License No. NPF-29
Response to Violation for Failure to Implement
Adequate Corrective Actions
Report No. 50-416/95-04, dated 04/24/95
(GNRI-95/00085)

GNRO-95/00066

Gentlemen:

Entergy Operations, Inc. submits the response to Notice of Violation 50-416/95-04.

NOV 50-416/95-04 stated that Grand Gulf Nuclear Station (GGNS) had failed to implement adequate corrective action to preclude recurrence of two events that were in violation of NRC requirements. GGNS agrees with the findings of this inspection report.

GGNS has reviewed the cited events and believes that completion of actions currently underway combined with recently initiated measures will be adequate to prevent recurrence of these violations. GGNS's response to this notice of violation is attached.

Please let me know if we can provide additional information on this violation.

Yours truly,

CRH/JEO/
attachment: Response to Violation 50-416/95-04
cc: (See following page)

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Notice of Violation 95-04

During an NRC inspection conducted on March 5 through April 8, 1995, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10CFR Part 2, Appendix C, the violation is listed below:

10 CFR, Part 50, Appendix B, Criteria XVI, requires that measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions and deficiencies, are promptly identified and corrected. 10CFR 50 Appendix B is implemented by the Quality Assurance Topical Report, GGNS-TOP-1A. Section 16.5.3 of the Topical Report requires that action be promptly initiated by the responsible organization to correct the condition and to determine if action is necessary to preclude recurrence.

Contrary to the above,

- 1 Corrective actions following a reactor scram on November 1, 1994, were inadequate in that maintenance practices which caused ground faults on the 125 VDC electrical bus and contributed to a subsequent spurious backup scram valve initiation were not corrected and did not prevent a similar recurrence on March 16, 1995.
- 2 Corrective actions following a suppression pool siphoning event on October 4, 1993 did not prevent a similar recurrence on February 23, 1995.

I. Admission or Denial of the Alleged Violation

Entergy Operations, Inc. admits to this violation.

II. The Reason for the Violation, if Admitted

- 1 Corrective actions following the reactor scram that occurred on November 1, 1994 did not prevent recurrence of a reactor scram from similar circumstances on March 16, 1995. A contributing factor to both plant scrams was undetected grounds on the 125 VDC distribution bus. One similarity found in these grounds was the pinching of wires during replacement of electrical covers. The presence of the pinched wire grounds and other ground paths in conjunction with performance of certain routine surveillances, caused inadvertent actuation of the backup scram solenoid valve. Opening of the backup scram solenoid valve depressurized the scram header resulting in a reactor scram.

The root cause evaluation for the November 1, 1994 event listed as a contributing cause, less than adequate work practices. The pinched wire that led to the November 1994 event was believed to have occurred several years prior to the November 1994 event. For this reason, it was believed that the pinched wire was a random occurrence and no deficiency document was initiated to address work practices. Therefore, attentions were focused on detection of grounds, since it was recognized that grounds occurring for any reason needed to be promptly eliminated. However, subsequent to the March 1995 plant scram, a deficiency report was written to address work practices.

- 2 On October 4, 1993, in preparation for draining of the Residual Heat Removal System during RFO6, siphoning of the suppression pool occurred. The siphoning occurred because a vent path was not established to break the siphoning effect created by opening of certain drain valves.

The corrective actions that resulted from this event were not effective in preventing recurrence of a similar event on February 23, 1995. These action consisted of placing caution labels on these valves to ensure vents are open prior to opening these valves. However, placement of these labels did not distinguish them from labels designating valve number or name. Therefore the labels failed to prevent the February 1995 event.

III. Corrective Steps Which Have Been Taken and Results Achieved

- 1 Following the November 1, 1994 plant scram attributed to a ground on the 125 VDC distribution bus, weekly checks of the 125 VDC panel for grounds was added to the operator rounds. Subsequent to the March 1995 event, the frequency of these checks by the operators was increased to daily. In addition the electricians now perform ground checks every shift. Also, the corrective actions associated with a deficiency document to address work practices was to stress the importance of careful checks for pinched wires to plant electrical personnel.
- 2 Following the February 1995 suppression pool siphoning event, larger caution labels were installed on the drain valve hand wheels. These labels instruct the operator to ensure vent valves are open prior to opening the drain valves. In addition these valves are now administratively controlled by physical locks under the shift superintendent's control.

IV. Corrective Steps to be Taken to Preclude Further Violations

- 1 In addition to electricians, all maintenance personnel that perform work on 125 VDC systems will be made aware of the potential for causing grounds on the 125 VDC bus. Also, work toward completion of a DCP to provide alarmed ground detection in the control room is ongoing.
- 2 All actions associated with the suppression pool siphoning events have been completed.

V. Date When Full Compliance Will be Achieved

All actions are scheduled to be completed by September 30, 1995.