



MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

NUCLEAR PRODUCTION DEPARTMENT

January 12, 1984

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

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

Dear Mr. O'Reilly

SUBJECT: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-13
File: 0260/15525/15526
I.E. Report 50-416/83-41 of
October 24-27, 1983
AECM-84/0047

Reference: MAEC-83/0381, dated December 7, 1983

This letter provides our response to Violation 416/83-51-01. The response date was verbally extended until January 13, 1984 by your Mr. Caudle Julian on January 5, 1984.

Yours truly,

L. F. Dale
Manager of Nuclear Services

PRH:scb

Attachment

cc: Mr. J. B. Richard, w/a
Mr. R. B. McGehee, w/a
Mr. T. B. Conner, w/a
Mr. G. B. Taylor, w/a

Mr. Richard C. DeYoung, Director
Office of Inspection & Enforcement
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

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Q PDR

NRC VIOLATION 416/83-51-01

Mississippi Power & Light Company denies the alleged violation.

The intent of Technical Specification 3.1.4.2 is to impose restrictions established on control rod withdrawal and insertion sequences so that operation is bounded by the Rod Drop Accident Analysis. The technical specification gives ACTION statements for an inoperable RPCS and inoperable control rods. The specification also allows sequence restraints to be bypassed for certain tests (Tech Spec 3.10.2).

The RPCS design (found to be acceptable per GGNS SER Section 7.6) allows bypassing up to eight control rods. Bypassing rods does not make RPCS inoperable. Likewise, being out of sequence does not make a rod inoperable, and having RPCS bypassed for a rod does not make the rod inoperable. The controls required for bypassing operable control rods are similar to those stated for bypassing inoperable rods listed in Tech Spec 3.1.4.2 ACTION b, but the Tech Spec does not address operable control rods bypass controls. Tech Spec 3.10.2 is concerned with allowing the sequence restraints imposed by the Rod Pattern Control System to be bypassed during certain tests which is a different situation from bypassing operable control rods during normal plant evolutions.

Tech Spec 3.10.2 does not require adherence to the administrative controls given in Tech Spec 3.1.4.2 ACTION b; bypassing operable control rods during normal plant evolutions would require such controls to be in place.

An operable control rod which occupies an in-sequence position can be bypassed and inserted any number of notches, and then it can be restored to its original in-sequence position. A bypassed control rod, during insertion and withdrawal to its original in-sequence position, is never occupying a position which is not bounded by the analysis (NEDO-10527 Supplements 1 and 2 and NEDO-21231). Since the Technical Specifications do not prohibit or even address the subject of bypassing operable control rods, MP&L denies the violation. MP&L has added guidance in its operating procedures to ensure proper control is maintained when bypassing operable control rods.