



# MISSISSIPPI POWER & LIGHT COMPANY

*Helping Build Mississippi*

P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

April 4, 1984

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 0260/15524/0310  
Report No. 50-416/84-05, dated  
March 5, 1984 (MAEC-84/0088)  
AECM-84/0211

This is in response to your letter to Mississippi Power & Light Company from Richard C. Lewis, dated March 5, 1984.

Attached is the response to the two violations cited in the report.

Should you have any questions, please contact my office.

Yours truly,

L. F. Dale  
Manager of Nuclear Services

RLS/PRH:lm  
Attachment

cc: Mr. J. B. Richard (w/a)  
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  
Washington, D.C. 20555

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Member Middle South Utilities System

NRC VIOLATION 84-05-02

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Mississippi Power & Light admits to the alleged violation in that retests for the maintenance work orders were specified by Maintenance Planners rather than Maintenance Engineers.

II. REASONS FOR THE VIOLATION IF ADMITTED

Plant Staff was reorganized on October 1, 1983. However, prior to the reorganization, Maintenance Engineering consisted of Maintenance Engineers, Maintenance Planners, Field Engineers, and the Spare Parts Group. All of these groups reported to the Maintenance Engineering Supervisor who in turn reported to the Technical Superintendent. The Technical Superintendent was responsible for identifying retests through Maintenance Engineering and Technical Engineering.

Upon reorganization the Maintenance Superintendent became responsible for identifying retests. Maintenance Engineering was divided as a group with the maintenance engineers and the maintenance planners reporting to their respective Discipline Maintenance Superintendent, the field engineers reporting to the Contracts Administrator, and the Spare Parts Group reporting to the Maintenance Superintendent.

Plant Procedures 01-S-07-1, "Control of Work on Plant Equipment and Facilities", and 01-S-07-2, "Test and Retest Control", were revised to reflect the new organizational structure. Plant Procedure 09-S-07-6, "Control of Retest Requirements", was not revised.

Plant Administrative Procedure 01-S-07-2 assigns responsibility for maintenance retests to the Maintenance Department and Plant Administrative Procedure 01-S-07-1 specifies that maintenance planners and maintenance engineers are responsible for specifying maintenance retests.

Technical Section Procedure 09-S-07-6, Revision 2, refers to Maintenance Engineering as it existed prior to reorganization. It was intended that maintenance engineers and maintenance planners specify maintenance retests. This procedure, however, did not specify that maintenance planners could prescribe retests.

III. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

A review was performed on Plant Administrative Procedure 01-S-07-1, 01-S-07-2, and Technical Section Procedure 09-S-07-6. During this review it was determined that Technical Section Procedure 09-S-07-6 was unclear concerning Maintenance Planning and/or Maintenance Engineering responsibilities in respect to specifying maintenance tests or retests.

In response to the specific MWOs identified, Plant Quality Deficiency Report 046-84 was issued to document that these MWOs did not have adequate work instructions. These MWOs were corrected and reissued to the field for completion of the work activities. In addition, to provide corrective action in this matter, the Maintenance Superintendent issued a memo to all maintenance planners/engineers and superintendents informing them that inadequate work instructions had been provided in the specific MWOs and attention to this area must be given. Also, since the Plant Quality Section had reviewed and approved the MWOs, the Plant Quality representative responsible for approving MWOs was given additional training.

IV. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATION

Technical Section Procedure 09-S-07-6 will be revised to clarify the responsibilities of Maintenance Engineering and Maintenance Planning under the new organizational structure as they apply to retests. This revision will allow maintenance planners to specify retests on MWOs where approved plant procedures, vendor manuals, design specifications, or other approved documentation exists. Also, where retest requirements are not approved by a formal piece of documentation, maintenance planners will be required to get the approval of Maintenance Engineering for the retest they specify.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance will be achieved by April 30, 1984.

NRC VIOLATION 416/84-05-03 - EXAMPLE A

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Mississippi Power & Light Company admits to the violation as stated; however, there was no effect on the health and safety of the public.

II. REASON FOR THE VIOLATION IF ADMITTED

Because of the Grand Gulf Nuclear Station (GGNS) location along the flood plain of the Mississippi River, several sectors are inaccessible for location of TLDs in the 4-5 mile range as required by the GGNS Technical Specifications. This was reported in the 1982 Annual Radiological Environmental Operating Report.

III. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

A Technical Specifications change request package has been prepared which will require TLDs in the 4-5 mile range where accessible. This change is consistent with the BWR Standard Radiological Effluent Technical Specifications (NUREG-0473, Revision 3, Draft 7).

IV. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATION

The proposed change to the Technical Specifications to nullify the requirement for TLDs in the inaccessible 4-5 mile range will be submitted to the NRC.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance will be achieved upon approval of the proposed Technical Specifications change by the NRC.



NRC VIOLATION 416/84-05-03 - EXAMPLE B

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Mississippi Power & Light Company admits to the violation as stated; however, there was no effect on the health and safety of the public.

II. REASON FOR THE VIOLATION IF ADMITTED

The reason for the violation is failure to recognize the escalation in sampling frequency following receipt of the Low-Power Operating License on June 16, 1982.

III. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

A description of the reasons for not conducting the milk sampling program, as required, and plans for preventing a recurrence has been developed and will be included in the 1983 Annual Radiological Environmental Operating Report.

A procedure (Nuclear Services Administrative Procedure SP-R-8, "Milk Sample Collection") has been developed and issued which prescribes requirements for the sample collection methodology and frequency for milk sampling.

Milk sampling has been conducted twice a month as of November 1982 to the present; and, thus, compliance with this aspect of the violation has been achieved.

IV. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Adherence to the procedure (SP-R-8) will ensure no further violations.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance will be achieved upon submittal of the 1983 Annual Radiological Environmental Operating Report. This report will be submitted on or before May 1, 1984.

NRC VIOLATION 416/84-05-03 - EXAMPLE C

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Mississippi Power & Light Company (MP&L) admits to the violation as stated; however, there was no effect on the health and safety of the public.

II. REASON FOR THE VIOLATION IF ADMITTED

Broadleaf vegetation samples were unavailable on several occasions and MP&L failed to notify the NRC of this sampling discrepancy as required in the Grand Gulf Nuclear Station (GGNS) Technical Specifications. This failure to notify was due primarily to discrepancies between the GGNS Technical Specifications and the BWR Standard Radiological Effluent Technical Specifications (NUREG-0473, Revision 3, Draft 7) and with guidance received from NRC headquarters.

III. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN A. THE RESULTS ACHIEVED

A Special Report for all past broadleaf vegetation sample unavailabilities is being developed and will be submitted as required by the GGNS Technical Specifications.

IV. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Efforts are being made to improve the garden site in Sector J by providing suitable topsoil and water to the area. This should improve the availability of vegetation samples in this location. In addition, MP&L personnel are working with Alcorn State University's Agricultural Department to provide a permanent control plot at their facility. This will ensure that vegetation samples are available from a controlled location.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance will be achieved upon submittal of the Special Report identifying the past unavailable samples. This report will be submitted to the NRC on or before April 15, 1984.