



MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

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March 16, 1984

NUCLEAR PRODUCTION DEPARTMENT

Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Mr. Harold R. Denton, Director

Dear Mr. Denton:

SUBJECT: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-13
File 0260/0840/L-860.0
Inservice Inspection Program,
Request for Delay in Plan
Submittal
AECM-84/0107

The Grand Gulf Nuclear Station (GGNS) Operating License, NPF-13, presently contains License Condition 2.C.(18) which requires the submittal of the GGNS Inservice Inspection (ISI) Program by June 30, 1983. On May 31, 1983, Mississippi Power & Light Company (MP&L) submitted AECM-83/0302 which requested a delay in the submittal date of the ISI Program. By letter dated August 8, 1983, Mr. A. Schwencer, of your office, approved our request to delay the ISI Program submittal until April 1, 1984. The purpose of this letter is to request and justify an additional delay in the submittal of the GGNS ISI Program. This matter was discussed on February 10, 1984 with Mr. D. Houston (NRC Project Manager) and Mr. M. Hum (Materials Engineering Branch).

License Condition 2.C.(18) is discussed in Section 5.2.4.1 of Supplement 4 to the GGNS Safety Evaluation Report (NUREG-0831). In the discussion, the NRC Staff indicated that the GGNS ISI Program will be evaluated prior to the start of the first refueling outage. At the time of our letter, AECM-83/0302, it was expected that GGNS Unit 1 would be at full power by April 1984 and that the submittal of the ISI Program at that time would allow the Staff sufficient time to review and accept the program. For reasons discussed below, a submittal by August 1, 1984, is proposed.

To comply with 10CFR 50.55a(b), MP&L's ISI program must incorporate the requirements of the Summer 1979 addenda to the ASME Code Section XI. This addenda incorporated the IWF section into the code. At present, article IWF-1230, "Supports Exempt from Examination and Test," is in the course of preparation, and no guidance is provided as to the supports that must be included in the population of Code Class 1, 2 and 3 supports subject to sampling for inservice inspection. In the absence of specific guidance MP&L has been developing a justifiable exemption criteria for those supports. To support the development of an exemption criteria, MP&L representatives have

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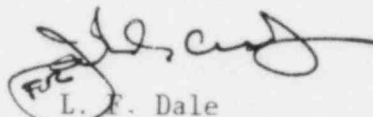
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attended meetings of the code committee working group on component supports. The data gathered by the preservice inspection program has also been considered in the criteria development. In addition, MP&L has remained cognizant of the NRC's recent proposals to the working group in the area of sampling selection. As a result of the NRC proposals made to the working group, MP&L elected to revise, as appropriate, the current selection methodology to ensure consistency with the newer methodologies. This change in selection techniques and, to a lesser extent, the absence of related guidance in IWF-1230, has delayed the development of an integrated ISI program.

Because of the circumstances surrounding the support selection program, discussed above, and the current schedule for first refueling outage, MP&L considers the delay of the subject submittal to August 1, 1984, to be justified and, therefore, requests your approval in this matter. By virtue of the discussions with your staff, referenced earlier, it is our understanding that this MP&L position is acceptable. If you have any questions, please contact this office.

Yours truly,



L. F. Dale

Manager of Nuclear Services

REW/JGC:lm

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

Mr. Richard C. DeYoung, Director
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