



MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

April 27, 1984

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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 0260/15524/0310/15521
Report No. 50-416/84-07,
(MAEC-84/0123)
AECM-84/0261

This is in response to your letter to Mississippi Power & Light Company from Richard C. Lewis, dated March 30, 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. N. S. Reynolds (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 416/84-07-02

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Mississippi Power & Light Company (MP&L) admits to the alleged violation as stated.

II. THE REASON FOR THE VIOLATION IF ADMITTED

Lack of a system to track the training of emergency preparedness personnel was the reason for the violation.

As MP&L admits to this violation, the following comment is provided:

MP&L was aware that its emergency plan training was not current for members of the on-site emergency organization. This information was provided to Messrs. J. Olshinski, D. Verrelli, and C. Julian on January 30, 1984, when we discussed our review of training not included within the scope of the recertification program. Further, this information was provided to you in our letter, AECM-84/0100, dated February 11, 1984. Additionally, this area was inspected by regional management and the results documented in NRC Report 50-416/84-01.

MP&L is aware that in both the AECM and Report 50-416/84-01, the dates of February 15, February 22, and prior to 5% power were used as dates when we expected to complete our corrective actions. When we passed these dates, this matter was discussed with our Quality Assurance Department, since we had also committed in Corrective Action Request (CAR) 813 to have these actions completed by February 15, 1984. It was then determined and agreed that the date of "next criticality" would be used to resolve this matter.

When we conducted the emergency drill on March 7, 1984, we were still aware that our emergency preparedness training was not complete. However, since our annual emergency exercise was approaching, we decided to conduct this emergency drill. Further, this would allow both Corporate and Plant Staff emergency planning coordinators to evaluate and determine if any additional areas of training were needed.

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

A matrix/punchlist was developed by the Training Department to track the correct status of emergency preparedness training of plant personnel. The matrix/punchlist contained all the required training areas specified in Plant Administrative Procedure 01-S-04-21. This listing also provided a readily discernible indication of the qualification status of emergency response personnel.

The Plant Compliance Section performed a random review of training records versus the matrix/punchlist to determine its accuracy. This review indicated that the tracking system was working as designed.

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

Plant Administrative Procedure 01-S-04-21, "Emergency Preparedness Training Program," is being revised to require that the Training Superintendent provide the matrix/punchlist to appropriate plant personnel on a monthly basis. This will allow plant supervisors to ensure that trained personnel are assigned to each shift and to preplan for training which is about to expire.

Additionally, since the Maintenance Superintendent (OSC Director during an emergency event) will receive a copy of this matrix/punchlist, he will know the qualifications of the personnel he is using for emergency response team members.

V. THE DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

MP&L has achieved full compliance in that we presently have the required number of personnel qualified to respond to an emergency event, as required by Table 5-1, "Shift Staffing and Augmentation Capabilities," of our Emergency Plan.

With respect to the revision to 01-S-04-21, "Emergency Preparedness Training Program," this procedure will be revised by May 30, 1984.

NRC VIOLATION 416/84-07-03

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Mississippi Power & Light (MP&L) admits to the alleged violation as stated. However, this violation had no effect on the safety of the public.

II. REASON FOR THE VIOLATION IF ADMITTED

Temporary upgrading of personnel is allowed by ANSI N18.1-1971, paragraph 3.1 for "short-term absences" as was stated in the inspection report. MP&L, however, had not procedurally defined the time frame for "short-term absences" for temporary assignments as allowed by this standard.

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

A Temporary Change Notice (TCN) was issued for Plant Administrative Procedure 01-S-01-1, "Grand Gulf Nuclear Station Organization Structure," to define "short-term absences" for temporary assignments. This change allows for temporary assignment of individuals as "acting" for a maximum of six months at which time the appointed individual must meet the appropriate job requirements of committed-to standards.

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

The TCN written against Plant Administrative Procedure 01-S-01-1, "Grand Gulf Nuclear Station Organizational Structure," will be incorporated into the next revision. In addition to incorporating the TCN at the next revision, the following additional areas will be addressed:

- o Who can appoint temporary assignments?
- o What action will be taken after six months if the temporarily assigned individual does not meet the requirements?
- o Specify any exceptions (i.e., N/A for Technical Specification licensed positions, PSRC members, etc.).

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance will be achieved by May 30, 1984.