



# MISSISSIPPI POWER & LIGHT COMPANY

*Helping Build Mississippi*

P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

June 18, 1984

JAMES P. MCGAUGHY, JR.  
VICE PRESIDENT

U.S. Nuclear Regulatory Commission  
Office of Nuclear Reactor Regulation  
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  
Proposed Amendment to the  
Operating License (PCOL-84/11A)  
AECM-84/0336

Mississippi Power & Light Company (MP&L) completed its review of the Grand Gulf Nuclear Station Technical Specifications in accordance with the Technical Specification Review Program (TSRP) submitted to the NRC on March 18, 1984 (AECM-84/0183). The results of the TSRP were submitted to the NRC on April 9, 1984 (AECM-84/0217) and on April 19, 1984 (AECM-84/0229). Findings of the TSRP, which require changes to the Grand Gulf Technical Specifications, were identified on Technical Specification Problem Sheets (TSPS). A number of revised Problem Sheets were submitted to the NRC on May 1, 1984 (AECM-84/0251) and on May 8, 1984 (AECM-84/0286). Eleven additional problem sheets summarizing items identified by the NRC were included in the May 1, 1984 letter. Since submittal of the final TSRP results, MP&L and the NRC staff have met numerous times to discuss the TSRP findings, and the justification for, and safety significance of any proposed changes to the Grand Gulf Technical Specifications identified during the TSRP.

On April 18, 1984, the NRC issued an Order Restricting Conditions for Operation of Grand Gulf Unit No. 1, in which twenty-two changes were made to the Grand Gulf Technical Specifications. These twenty-two changes were those identified by MP&L in its TSRP as being necessary to support restart and full power operations for Unit No. 1. With the implementation of these changes to the Grand Gulf Technical Specifications, MP&L was authorized to restart and operate Unit No. 1 under its operating license up to five percent power.

On May 24, 1984 MP&L submitted a proposed amendment to the Grand Gulf Nuclear Station Technical Specifications. This amendment included a revised organization and modified terminology in the administrative section of the technical specifications. This amendment also resolved two technical specification problem sheets as noted in a letter from MP&L to the NRC dated May 25, 1984 (AECM-84/0303). Further proposed changes associated with the TSRP were submitted on June 17, 1984 (AECM-84/0330).

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Member Middle South Utilities System

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As a follow-up to the TSRP and the NRC Order of April 18, 1984, MP&L was notified by letter dated May 9, 1984 from Mr. T. M. Novak of the methods to be used in resolving the findings of the TSRP. In accordance with that letter and with 10CFR 50.59 and 10CFR 50.90, MP&L requests that the proposed changes to the Grand Gulf Technical Specifications, set forth in the attachments to this letter be incorporated into the full power amendment to License No. NPF-13. All of these proposed changes to the Grand Gulf Technical Specifications have been reviewed and evaluated by both MP&L and the NRC staff as part of and in conjunction with MP&L's TSRP. The proposed changes in the attachment to this letter are a portion of the changes necessary to render the Grand Gulf Nuclear Station Technical Specifications consistent in all material respects with the as-built plant, the SER, and the FSAR and supporting documents.

The description of, technical justification for, and safety evaluation of the proposed changes to the Grand Gulf Technical Specifications are included in the attachment to this letter which contains all of the proposed technical specification changes within the purview of the Chemical Engineering Branch, Division of Engineering of the Office of Nuclear Reactor Regulation.

The proposed changes to the Grand Gulf Technical Specifications have been divided into four categories as described below. This categorization was made to assist the NRC staff in expediting its review of the proposed changes to the Grand Gulf Technical Specifications:

#### TECHNICAL SPECIFICATION CHANGE CATEGORIES

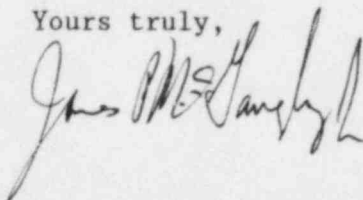
- o **TYPOGRAPHICAL ERRORS, EDITORIAL CHANGES, CLARIFICATIONS:** Changes which correct obvious typographical errors, implement editorial changes such as correction of spelling errors, punctuation errors and grammatical errors or merely provide clarification of, without changing, the basic meaning and intent of the technical specification being changed.
- o **TECHNICAL SPECIFICATION/AS-BUILT PLANT CONSISTENCY:** Changes which are proposed to render the technical specifications consistent with the as-built plant. In all such cases, the as-built plant is consistent with the safety analyses and the licensing basis.
- o **ENHANCEMENTS THAT ARE CONSISTENT WITH THE SAFETY ANALYSES:** Changes which are consistent with the safety analyses and the licensing basis and which provide clarification, render areas consistent with the philosophy and intent of the technical specifications, or provide additional plant operational margin.
- o **REGULATORY REQUIREMENTS/REQUESTS/RECOMMENDATIONS:** Changes or enhancements to render the technical specifications consistent with recent changes in NRC policy and the Code of Federal Regulations as well as to implement changes or enhancements recently requested or recommended by the NRC.

The enclosed changes to the Grand Gulf Technical Specifications have been reviewed and approved by the Plant Safety Review Committee and the Safety Review Committee. All of the proposed changes have been determined to be conservative with respect to the Grand Gulf safety analyses and, based on the guidelines set forth in 10CFR 50.92, involve no significant hazards considerations.

In accordance with provisions of 10 CFR 50.30, three (3) signed originals and forty (40) copies of the proposed changes to the Grand Gulf Technical Specifications, as described in the attachment, are hereby formally provided for your review and approval. These proposed changes include an additional portion of the changes to the Grand Gulf Technical Specifications identified by the TSRP and determined by the NRC staff to require resolution prior to issuance of the full power amendment to License No. NPF-13.

Based upon MP&L's evaluation of the proposed changes and upon discussions with members of your staff, MP&L has concluded that there should be no additional fee for the proposed technical specification changes.

Yours truly,



JPM:lm  
Attachments

cc: Mr. J. B. Richard (w/o)  
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

Mr. J. P. O'Reilly, Regional Administrator (w/a)  
U.S. Nuclear Regulatory Commission  
Region II  
101 Marietta St., N.W., Suite 2900  
Atlanta, Georgia 30323

Dr. Alton B. Cobb (w/a)  
State Health Officer  
State Board of Health  
Box 1700  
Jackson, Mississippi 39205

BEFORE THE  
UNITED STATES REGULATORY COMMISSION

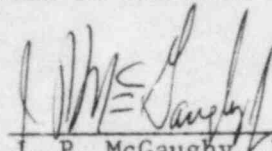
LICENSE NO. NPT-13

DOCKET NO. 50-416

IN THE MATTER OF  
MISSISSIPPI POWER & LIGHT COMPANY  
and  
MIDDLE SOUTH ENERGY, INC.  
and  
SOUTH MISSISSIPPI ELECTRIC POWER ASSOCIATION

AFFIRMATION

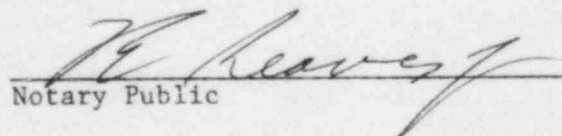
I, J. P. McGaughy, Jr., being duly sworn, stated that I am Vice President - Nuclear Support of Mississippi Power & Light Company; that on behalf of Mississippi Power & Light Company, Middle South Energy, Inc., and South Mississippi Electric Power Association I am authorized by Mississippi Power & Light Company to sign and file with the Nuclear Regulatory Commission, this application for amendment of the Operating License of the Grand Gulf Nuclear Station; that I signed this application as Vice President - Nuclear Support of Mississippi Power & Light Company; and that the statements made and the matters set forth therein are true and correct to the best of my knowledge, information and belief.

  
J. P. McGaughy, Jr.

STATE OF MISSISSIPPI  
COUNTY OF HINDS

SUBSCRIBED AND SWORN TO before me, a Notary Public, in and for the County and State above named, this 18 day of June, 1984.

(SEAL)

  
Notary Public

My commission expires:

Feb 13, 1985

ATTACHMENT  
TO  
AECM-84/0336 (6/18/84)

PROPOSED CHANGES TO THE  
GRAND GULF NUCLEAR STATION  
TECHNICAL SPECIFICATIONS

NRC TECHNICAL REVIEW BRANCH: CHEMICAL ENGINEERING



Listing of Item Numbers by  
Technical Specification Problem Sheet (TSPS) Number

<u>TSPS No.</u>	<u>Item Nos.*</u>
055	A.02
070	D.01
071	D.01
072	D.02
073	B.01
102	B.01
203	B.02
223	D.03
244	B.03
245	B.04
277	C.01
299	B.05, A.01
304	B.01
338	B.06
351	B.01

\*Item number format:

A.02  
└─ Item number within category  
└─ Category designator

A. TYPOGRAPHICAL ERRORS, EDITORIAL CHANGES, AND CLARIFICATIONS

These proposed changes correct obvious typographical errors, implement editorial changes such as correction of spelling errors, punctuation errors, and grammatical errors or provide clarification of the basic meaning or intent of the subject technical specifications.

MP&L has determined that the proposed changes do not:

- o Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- o Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- o Involve a significant reduction in a margin of safety.

Therefore, the proposed changes do not involve a significant hazards consideration.

A description of these changes including necessary justification for the changes is provided below:

TYPOGRAPHICAL ERRORS

A typographical error is being corrected by this submittal as listed below. Correction of this typographical error is purely an administrative change. (See attached revised technical specification page for exact change proposed.)

	<u>TSPS No.</u>	<u>TS Page No.</u>
1.	299	3/4 7-33

EDITORIAL CHANGES

A proposed editorial change to the technical specification is discussed below:

2. (TSPS 055), Reactor Coolant System Surveillance Requirement, Technical Specification 3/4.4.4

The proposed change is to delete the phrase "for up to 31 days" from Surveillance Requirement 4.4.4.c. As presently worded the

Surveillance Requirement could be interpreted to imply that the in-line conductivity measurement is required only for the first 31 days of the period in which the continuous recording conductivity monitor is inoperable. Deletion of this phrase will clarify the intent of the surveillance requirement, that is, to measure the in-line conductivity for any period of time that the continuous recorder is INOPERABLE. This change is purely administrative in order to clarify the requirement.  
(Page 3/4 4-12)



B. TECHNICAL SPECIFICATION/AS-BUILT PLANT CONSISTENCY

The following changes are proposed to render the technical specifications consistent with the as-built plant. In all such cases, the as-built plant is consistent with the safety analyses and the licensing basis.

In that these proposed changes are inherently consistent with the safety analyses and the licensing basis, it is concluded that the proposed changes do not:

- o Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- o Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- o Involve a significant reduction in a margin of safety.

Therefore, the proposed changes do not involve a significant hazards consideration.

A description of these changes including justification for the changes is provided below:

1. (TSPS 073, 102, 304, 351), Fire Detection Instrumentation, Technical Specification 3/4.3.7.9, Table 3.3.7.9-1, and Bases 3/4.3.7.9

The following Technical Specification changes are proposed:

- a. Revision of Table 3.3.7.9-1 format to list the fire detection instrumentation by zones and areas within each zone.
- b. Identification of instrumentation by type as Function A (early warning and notification only) and Function B (actuation of fire suppression systems and early warning and notification).
- c. Clarification of the associated ACTION statements for Function A and Function B inoperable instrument(s).
- d. Revision of Bases 3/4.3.7.9 to address Function A and Function B instrumentation.
- e. Incorporation of additional detectors, zones and areas into Table 3.3.7.9-1.

Some of the proposed changes included herein supercede changes previously submitted as Item 1 of letter AECM-83/0565, dated September 9, 1983 and withdrawn by letter AECM-84/0303 dated May 25, 1984.

The proposed changes to clarify the location, type and function of instrumentation and the changes to the ACTION statements and Bases are enhancements to reflect as-built conditions.

Zones, areas and associated instrumentation are added to include those areas that contain either safety-related equipment/cables protected by fire detection instrumentation or nonsafety-related equipment/cables protected by fire detection instrumentation whose malfunction could affect fire detection instrumentation in areas containing safety-related equipment/cables. Instrumentation was also added by design changes to increase fire detection capability. These changes are enhancements to safety in that they increase the amount of fire protection equipment included in the specification, provide clarification and are consistent with the as-built plant. (Pages 3/4 3-76 through 3/4 3-80 and B 3/4 3-5)

2. (TSPS 203), Spray and/or Sprinkler Systems, Technical Specification 3.7.6.2

This proposed change correctly identifies the sprinkler system for the control building elevation 93 feet (Item 3) as NSP64D140. This proposed change clarifies that this sprinkler system is shared between Units 1 and 2 and is a purely administrative change made to reflect as-built conditions and design intent. (Page 3/4 7-31)

3. (TSPS 244), Halon Systems, Technical Specification 3/4.7.6.4

The proposed change to Technical Specification Surveillance Requirement 4.7.6.4.a will delete the hazard area selector valves F497G and F497H from the requirement to verify valve position. All valves in the Halon flow paths are totally enclosed, nitrogen pressure or explosive pin actuated valves that cannot be manually manipulated or visually verified to be in the correct position. In addition, operation of any of the valves would actuate the system, which is contrary to the intent of the subject surveillance requirement. All other valves in the Halon flow path except valves F497G and F497H can be indirectly verified to be in their correct position by measurement of halon tank pressure since a failed or leaking valve would bleed off the affected tank. The proposed change will not adversely impact plant safety because it is consistent with the intent of the surveillance requirement and will make the surveillance requirement consistent with the as-built plant. (Page 3/4 7-35)

4. (TSPS 245), Spray and/or Sprinkler Systems, Technical Specification 3/4.7.6.2

A revision to the subject technical specification is proposed which will add a footnote and appropriate references to indicate that the

areas listed for the auxiliary building, control building, and fire pump house are protected by wet pipe sprinkler systems. The diesel generator building is shown to be protected by pre-action sprinkler systems. The proposed changes are purely administrative modifications to reflect the as-built plant design and do not affect the technical content of the technical specifications. (Page 3/4 7-31)

5. (TSPS 299) CO<sub>2</sub> Storage Tank Level, Technical Specification  
3/4.7.6.3

The proposed change increases the minimum CO<sub>2</sub> storage tank level requirement in Surveillance Requirement 4.7.6.3.2.a. from 50% to 60%. The design requirement for the CO<sub>2</sub> storage tank is to provide sufficient capacity for double-shot coverage for the largest room covered in addition to one main generator purge. The proposed change makes the CO<sub>2</sub> storage tank level consistent with the as-built plant. This proposed change is an enhancement to plant safety since it applies stricter requirements than the existing technical specification. (Page 3/4 7-34)

6. (TSPS 338) Fire Hose Stations, Technical Specification Table  
3.7.6.5-1

This proposed change adds two fire hose stations located in the control building to the list of fire hose stations which may be relied upon to confine and extinguish fires occurring in a portion of the facility where safety related equipment is located. The proposed change is appropriate because safety related cables pass through the areas covered by these hose stations. These two fire hose stations are installed in the plant and this change is proposed to reflect as-built plant design and usage. This change is an enhancement to plant safety in that it increases the amount of fire protection equipment included in the technical specification. (Page 3/4 7-38)

C. ENHANCEMENTS THAT ARE CONSISTENT WITH THE SAFETY ANALYSES

The following proposed change is an enhancement which is consistent with the safety analyses and the licensing basis and which provides clarification, renders areas consistent with the philosophy and intent of the technical specifications, or provides additional plant operational margin.

Since this proposed change is included in the current licensing bases and is bounded by existing safety analyses, the proposed change does not:

- o Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- o Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- o Involve a significant reduction in a margin of safety.

Therefore, the proposed change does not involve a significant hazards consideration.

A description of this change including justification for the change is provided below:

1. (TSPS 277) Fire Rated Assemblies, Technical Specification 3/4.7.7

This proposed change to Surveillance Requirement 4.7.7.1.c requires that sample selection of penetration seals be such that each penetration seal is inspected at least once during each 15-year period. The present specification requires at least 10% of each type of sealed penetration to be inspected at least once per 18 months but does not require each penetration to be inspected at least once per 15 years. This change is an enhancement to plant safety in that it constitutes a more stringent surveillance requirement than is presently in the technical specifications. (Page 3/4 7-41)



D. REGULATORY REQUIREMENTS/REQUESTS/RECOMMENDATIONS

The following changes are proposed to render the technical specifications consistent with recent changes in NRC policy and the Code of Federal Regulations, as well as to implement changes or enhancements recently requested or recommended by NRC reviewers.

These proposed changes are required to render the technical specifications consistent with recent NRC guidance, and it has been concluded based on a review of each item that the proposed changes do not:

- o Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- o Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- o Involve a significant reduction in a margin of safety.

Therefore, the proposed changes do not involve a significant hazards consideration.

A description of these changes including justification for the changes is provided below:

1. (TSPS 070 and 071) Deletion of Special Reporting Requirements for Fire Protection, Technical Specifications 3/4.7.6 and 3/4.7.7

The proposed revision to delete all references to special reporting requirements for inoperable components of fire suppression systems is in response to NRC Division of Engineering recommendations as found in memorandum from Victor Benaroya to Cecil O. Thomas, "Grand Gulf Nuclear Station Unit 1 - Technical Specifications," dated November 7, 1983. The deletion of the special reporting requirements does not constitute a relaxation of conditions required for safe operation in that the subject technical specifications retain all necessary corrective actions to ensure that the plant is operated safely. The revision therefore does not adversely impact plant safety and makes the subject technical specifications more easily understood. (Pages 3/4 7-28, 31, 33, 35, 36, 39, 41, and B3/4 7-3)

2. (TSPS 072) Spray and/or Sprinkler Systems, Technical Specification 3/4.7.6.2 and Bases 3/4.7.6

This proposed change revises Surveillance Requirement 4.7.6.2.c and Bases 3/4.7.6 to include visual inspection to ensure that spray areas and patterns are not obstructed by temporary structures or objects. This change is an enhancement to plant safety in that it constitutes an additional control not presently included in the technical specifications. In addition, this proposed change is consistent with proof and review comments provided to MP&L by the NRC Staff. (Page 3/4 7-32 and B3/4 7-3)

3. (TSPS 223) Fire Suppression System Surveillance Requirements,  
Technical Specification 3/4.7.6.1

This proposed change provides an additional surveillance requirement for the fire suppression water system. Surveillance Requirement 4.7.6.1.1.e was added to ensure that a system flush is performed at least once per 12 months. This addition was recommended by the Chemical Engineering Branch of the NRC, following their comparison of the GGNS Technical Specifications to the GE Standard Technical Specifications. This proposed change does not adversely affect plant safety since it provides a more stringent surveillance requirement. (Page 3/4 7-29)