



MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

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J. B. RICHARD
SENIOR VICE PRESIDENT - NUCLEAR

July 5, 1984

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/L-860.0
GGNS Technical Specification
Review Program Completion
AECM-84/0344

Mississippi Power and Light Company (MP&L) has completed a comprehensive review of the Technical Specifications for the Grand Gulf Nuclear Station (GGNS), Unit 1. All of the discrepancies with Grand Gulf Technical Specifications (GGTS) identified during the review were discussed with the NRC Staff. A mutual agreement by both parties was reached as to the proper resolution of each discrepancy. Based on this agreement, MP&L prepared and formally submitted to the NRC, as proposed changes to the operating license, all changes to the GGTS required to allow full power operation.

As a result of this review and with the incorporation into the GGTS of those changes now pending, MP&L is confident that the technical specifications accurately reflect the plant's as-built condition and conform in all material respects to the design and safety analyses underlying the technical specifications. The revised GGTS will support full-power operation of GGNS.

In response to your letter of February 24, 1984, and as a result of meetings with the NRC during the week of February 27, 1984, MP&L initiated a thorough review of the GGTS to ensure their consistency with the as-built plant, the FSAR, and the NRC's SER. A formal Technical Specification Review Program (TSRP) was conceived and implemented for the express purpose of identifying and appropriately resolving all inconsistencies and deficiencies that existed in the then-current GGTS. The TSRP was established so that, when completed, the adequacy and accuracy of the GGTS would be assured.

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During March 1984, MP&L, Bechtel Power Corporation, and the General Electric Company (GE) dedicated about 150 experienced, knowledgeable personnel to the TSRP. Approximately 7000 personnel-days were applied to this detailed, intensive review. The TSRP had several key features:

- * All key supervisory and management positions were filled by MP&L personnel;
- * The TSRP was conducted and controlled in accordance with a definitive, approved program procedure;
- * The review of each technical specification section, the review results, and the resolution of review findings were thoroughly documented;
- * The reviews were conducted by MP&L, Bechtel, and GE personnel who had substantial experience in nuclear power plant design, construction, operations, testing, and licensing;
- * The MP&L Quality Assurance organization audited the TSRP;
- * Significant upper management attention was focused on the TSRP through a Steering Committee consisting of Nuclear Production Department managers and GE and Bechtel management and through frequent meetings with the President and Senior Vice-President Nuclear; and
- * All necessary resources required to ensure the success of the TSRP were made available.

To provide independent assessments of the effectiveness of the TSRP, management commissioned several separate activities:

- * Impell Corporation performed a third party assessment of the TSRP (AECM-84/0235);
- * GE and Bechtel performed a confirmatory review of GGNS unique features to ensure that all design features unique to the Grand Gulf Mark III, BWR/6 designs were, in fact, appropriately included in GGTS (AECM-84/0274 to be submitted);
- * GE and Bechtel performed a review comparing the GGTS with Kuosheng Technical Specifications to verify that the GGTS contained all the key safety features of that prototype BWR-6/Mark III plant (AECM-84/0329);
- * GE performed an independent overview review of the MP&L and Bechtel portions of the TSRP (AECM-84/0302).

The TSRP was closely coordinated with your staff and with the Region II Inspection and Enforcement (I&E) Staff. MP&L established an office in Bethesda with resident MP&L personnel who met frequently with the NRC staff informing them of progress and results of the reviews. Later, meetings between NRC Staff and MP&L were held regularly to resolve all GGTS discrepancies identified during the TSRP. Region II I&E inspected the ongoing TSRP during March 28-30, 1984 with a representative from your staff. MP&L executives and managers were in frequent contact with NRC Staff members throughout the TSRP,

briefing them on progress and results and providing any requested information. MP&L conducted formal NRC Staff briefings on March 9, 1984 to present the TSRP plan (AECM-84/0183) and on April 4, 1984 to discuss TSRP results, causes of the GGTS inconsistencies and deficiencies, and the conformance of the as-built plant to the FSAR, SER, and GGTS (AECM-84/0217).

MP&L, Bechtel, and GE reviews of assigned sections of the GGTS were completed on schedule in late March 1984. The Review, Prioritization, and Direction Section of the TSRP organization completed its comprehensive review of all program results in early April. In mid-April, MP&L formally responded to the NRC's letter of February 24, 1984 and in that response made certain certifications regarding the accuracy of the GGTS and the conformance of the as-built plant to the FSAR (AECM-84/0231). Shortly thereafter, MP&L formally submitted to the NRC the TSRP Program Completion Report (AECM-84/0229).

Beginning in March and continuing through mid-April 1984, MP&L made five submittals proposing technical specification changes to the operating license needed to resolve 23 Priority 1 technical specification discrepancies identified by the TSRP. (AECM-84/0173, 0179, 0216, 0222, 0224). By Order, dated April 18, 1984, the NRC ordered that the Priority 1 items, necessary for operation of Unit No. 1, be incorporated as changes into the GGTS.

MP&L's position with regard to the Priority 1 items was that resolution of these items was a necessary and sufficient condition for the NRC to permit operation of GGTS in excess of 5% rated power, since they were the only items of any safety significance. MP&L concluded that the remaining Priority 2 and 3 items were substantially less significant than the Priority 1 items and could have been resolved, if necessary, after exceeding 5% rated power or could have been handled by administrative controls as an interim or possibly permanent measure.

However, shortly after the issuance of the April 18, 1984 Order, the NRC Staff, while not expressing disagreement with MP&L's evaluation of the safety significance of the Priority 2 and 3 items, determined that all remaining technical specification discrepancies should be addressed and, where appropriate, submitted as proposed changes to the operating license prior to exceeding 5% rated power. Although MP&L continued to believe that the resolution of the Priority 2 and 3 items was not a prerequisite, in terms of safety, for plant operation above 5% power, MP&L began immediately to work with the NRC Staff to resolve each discrepancy. The remaining discrepancies were eventually classified as:

- 1) Requiring no change to GGTS;
- 2) Requiring change to GGTS prior to exceeding 5% rated power;
- 3) Requiring change to GGTS, but in the longer term after exceeding 5% rated power.

MP&L developed marked-up pages of the GGTS identifying the proposed changes. Within the NRC Staff, responsibility for each affected technical specification was assigned to the appropriate NRC-NRR review branches. MP&L then met with

all the cognizant branch reviewers to agree on the necessary technical specification changes. A total of six submittals of proposed technical specification changes resulted from these meetings and are now pending before the NRC (AECM-84/0330, 0336, 0338, 0315, 0318, 0319).

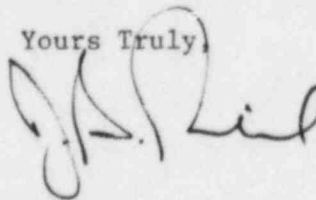
During the TSRP, certain changes to the FSAR were initiated due to discrepancies associated with technical specifications. In this regard, MP&L submitted Amendment 58 to the FSAR which consisted primarily of changes resulting from the TSRP (AECM-84/0122).

MP&L developed and reviewed all of the proposed GGTS changes in accordance with definitive, approved procedures which were in effect prior to the TSRP. Changes to the GGTS are formally controlled and subject to the requirements of the MP&L Quality Assurance program. MP&L thus has in place and functioning strong measures to ensure the GGTS will remain adequate and accurate. These controlling measures address the causes of the original GGTS inconsistencies and deficiencies and should prevent past problems from recurring.

The GGTS, when revised, will be clearer, less-ambiguous, internally consistent, and more understandable, thereby enhancing GGNS Plant Staff's ability to use them. The GGTS will also reflect the latest regulatory guidance available from the NRC relating to technical specifications.

The TSRP was comprehensive in terms of the intensity, the depth and breadth of technical specification reviews, and the checking and cross-checking of the review and review results to ensure technical specification completeness and accuracy. We agree along with Impell that the GGTS, as revised to reflect the results of the TSRP, are "very likely among the best in the industry." We are confident that GGNS, as supported by the Grand Gulf Technical Specifications, will operate safely and effectively.

Yours Truly,



JBR:scc

cc: Mr. R. B. McGehee
Mr. N. S. Reynolds
Mr. G. B. Taylor

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