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July 5, 1984

NUCLEAR LICENSING & SAFETY 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
Units 1 and 2
Docket Nos. 50-416 and 50-417
License No. NPF-13
File 0260/L-860.0/L-391.0
Response to NRC Region II
Concerns, Including Unique
Features Review Program
AECM-84/0274

References: 1) AECM-84/0217, dated April 9, 1984
2) NRC Region II Inspection Report No. 50-416/84-11, dated April 24, 1984.

On March 28-30, 1984, an NRC Region II Inspection and Enforcement Team conducted an inspection of Mississippi Power & Light Company's (MP&L) Technical Specification Review Program activities. The inspection team was led by Mr. Caudle Julian of NRC Region II, and included Mr. Donald Brinkman of the NRC Office of Nuclear Reactor Regulation.

During the exit interview, and later in NRC Inspection Report No. 50-416/84-11 (April 24, 1984), the NRC expressed concern regarding four issues related to the Technical Specification Review Program. Specifically, the concerns were:

1. Did the Technical Specification Review Program include adequate controls to assure that reviewer comments were appropriately and responsively addressed?
2. Was there an over-reliance on the BWR/6 Standard Technical Specifications for justification of the acceptability of the Grand Gulf Technical Specifications?
3. Did the Technical Specification Review Program include provisions to systematically verify the accuracy of Grand Gulf Technical Specification mode applicability requirements?
4. Did the Technical Specification Review Program include provisions to systematically identify the need for additional Technical Specifications reflecting Grand Gulf unique features?

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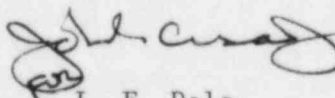
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1/1 Add: Don Brinkman

These concerns were addressed during the exit interview and subsequently at the April 4, 1984, meeting between the NRC and MP&L. Additionally, at the April 4, 1984, meeting, MP&L informed the NRC that a Unique Features Review was being performed to identify those major design features unique to the Grand Gulf BWR/6, Mark III design and to confirm that such features are adequately addressed in the Grand Gulf Technical Specifications. A supplemental discussion of the four concerns listed above was formally provided via AECM-84/0217, dated April 9, 1984. The attachment to this submittal provides an expanded discussion of each of the NRC concerns listed above and documents the completion and results of the Unique Features Review. In summary:

1. As a part of the Technical Specification Review Program, a system of carefully conceived and executed check and balance reviews provided assurance that reviewer comments were appropriately considered and responsively dispositioned.
2. While the BWR/6 Standard Technical Specifications were used during the Technical Specification Review Program, they were not solely relied upon to justify the acceptability of the Grand Gulf Technical Specifications.
3. The Technical Specification Review Program contained review elements and mechanisms which resulted in consideration of operating mode applicability.
4. As confirmed by the Unique Features Review, the Technical Specification Review Program assured that Grand Gulf unique features and their impact on the Technical Specifications were addressed.

Should you have any questions concerning this submittal, please contact this office.

Yours truly,



L. F. Dale
Director

NSM/CLT/JGC:dmb
Attachments

cc: (See Next Page)

MISSISSIPPI POWER & LIGHT COMPANY

AECM-84/0274

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RESPONSES TO NRC CONCERNS REGARDING
THE TECHNICAL SPECIFICATION REVIEW PROGRAM
(Reference NRC Region II Inspection Report 50-416/84-11)

QUESTION NO. 1:

Did the Technical Specification Review Program provide adequate controls to ensure reviewer comments were appropriately and responsively addressed?

RESPONSE NO. 1:

During the Technical Specification Review Program (TSRP), comments were generated by the Lead Review Organizations (LRO), namely: Bechtel, General Electric, the MP&L Administrative Review Group, and the MP&L Radiological Effluent Technical Specifications Review Group. Additional comments were generated by the Nuclear Plant Engineering and Senior Reactor Operator (SRO) representatives on the NSSS/BOP Onsite Review Team (ORT). Comments were documented in the review packages.

The Technical Specification Review Program contained several inherent check and balance features which assured that reviewer comments were appropriately and responsively addressed. During the review, problems noted by the Lead Review Organizations which might result in a change to the technical specifications were documented on a draft Technical Specification Problem Sheet (TSPS) and communicated immediately to the Review, Prioritization, and Direction Group (RPD). Upon concurrence by RPD of the significance of the problem, the draft TSPS was assigned a serial number and prioritized, thereby providing a mechanism to assure tracking and closure of the problem.

If RPD did not concur that the problem had sufficient significance to warrant a TSPS, then the draft TSPS was considered a comment and included in the review package for normal processing and subsequent re-review by RPD. If RPD and LRO failed to reach agreement, the matter was referred to the Project Manager for resolution in accordance with TS-1, TSRP procedure. This appeal process coupled with the requirement to re-review the draft TSPS, as delineated in procedure TS-1, provided assurance that comments were appropriately handled.

During the normal processing of review packages generated by the Lead Review Organizations, RPD was responsible for the disposition of all comments, including draft TSPS. Some comments were determined to require no further action, but approximately one hundred comments were processed as TSPS and numerous other comments were incorporated as revisions to existing TSPS. Regardless of final disposition, all comments, including draft TSPS, were retained in the review packages, which are part of permanent plant records.

All comments were processed through the following four phases to assure that they received appropriate consideration:

- o One of two RPD committees, each consisting of three members, reviewed and concurred in the disposition of comments in review packages assigned to them.
- o The RPD Manager reviewed all review packages emerging from the RPD committees to verify that comments were appropriately and consistently handled.
- o The Quality Engineer reviewed the RPD Manager's actions and directed particular attention to Lead Review Organization comments which were dispositioned by RPD as not requiring further action. All comments which appeared to be inappropriately resolved were returned to RPD. Ultimately, all comments were resolved to the satisfaction of the Quality Engineer.
- o The Project Manager conducted a final review of each review package and indicated approval via signature.

Additional assurance that all comments were appropriately processed was provided by implementation of two confirmatory actions, namely:

- o After final RPD review, each Lead Review Organization was provided copies of their respective review packages and was formally advised to contact the RPD Manager and, if necessary, the Project Manager if they disagreed with the ultimate disposition of their comments.
- o During the development of the Composite Consistency Matrix (reference Attachments E and F to AECM-84/0229, dated April 19, 1984), each Lead Review Organization was required to review all its review packages and document FSAR, Safety Evaluation Report, Standard Technical Specifications, as-built, internal Technical Specification, and other inconsistencies as initial input information to the Consistency Matrix. This initial information was reviewed by a group consisting of the Project Manager, the NSSS/BOP Manager, the NSSS Manager, the BOP Manager, the RPD Manager, an SRO Onsite Review Team representative, a Nuclear Plant Engineering representative, and Bechtel and General Electric onsite representatives. The resulting matrices were extensively reviewed by RPD, the RPD Manager, and the Project Manager through various revisions, culminating in Revision 4, dated April 13, 1984. The evolution of the Composite Consistency Matrix resulted in yet another review of Lead Review Organization comments, including draft TSPS, and issued TSPS.

In summary, there were many procedural checks and balances inherent in the Technical Specification Review Program to assure that reviewer comments were appropriately and consistently addressed. MP&L is confident that all reviewer comments have been thoroughly reviewed and responsively dispositioned. MP&L maintains that the process provided for the resolution of all significant comments and was carefully constructed to assure that potentially significant comments were not discounted and summarily dismissed.

QUESTION NO. 2:

Were the BWR/6 Standard Technical Specifications overly relied upon in justifying the acceptability of the Grand Gulf Technical Specifications?

RESPONSE NO. 2:

The BWR/6 Standard Technical Specifications (December 1983 Draft) were used during the Technical Specification Review Program as a review document, as were the FSAR and supporting documentation, the Safety Evaluation Report (SER) and Supplements, design documents, and as-built plant configuration documentation to identify areas of inconsistency with the Grand Gulf Technical Specifications. The Standard Technical Specifications were used in the review primarily as an aid to determining content, level of detail, and format to be included in plant specific Technical Specifications. The Standard Technical Specifications were considered to be representative of the current philosophy regarding BWR/6 Technical Specifications.

While MP&L realized that the Standard Technical Specifications are not a formally approved document, MP&L believed that their use could provide insight concerning BWR/6 design features and safety parameters which are appropriate for inclusion in Technical Specifications. Although development of the draft BWR/6 Standard Technical Specifications relied heavily on experience gained from developing the Grand Gulf Technical Specifications, they also significantly relied upon experience and input gained to date from the NRC, General Electric, and other BWR Owners. The Standard Technical Specifications also reflect lessons-learned in developing approved, mature BWR/3, 4, and 5 Standard Technical Specifications.

Although LRO review documentation contained references in a few instances to the Standard Technical Specifications as justification for either the existing status or a proposed revision of the Grand Gulf Technical Specifications, this reference alone was not considered to be sufficient technical basis for changing the Grand Gulf Technical Specifications. All changes were required to be based upon sound engineering and licensing bases. The review checklist and supporting instructions clearly required the Lead Review Organizations to comprehensively use the FSAR and supporting documentation, the SER, design documents, and as-built plant configuration documentation as well as the Standard Technical Specifications. Nothing in procedure TS-1 encouraged the Lead Review Organizations to overly rely upon the Standard Technical Specifications.

A review of the Composite Consistency Matrix results (reference AECM-84/0229) shows the following distribution of inconsistencies:

FSAR Inconsistencies	73
SER Inconsistencies	14
Standard Tech. Spec. Inconsistencies	47
As-built Inconsistencies	70
Other Tech. Spec. Area Inconsistencies	21
Other Inconsistencies	51

This distribution of final results indicates that the Standard Technical Specifications were not overly relied upon during the Technical Specification Review Program. This fact was substantiated by Impell Corporation in their third party review (reference AECM-84/0235, dated April 16, 1984) of the Technical Specification Review Program. Impell Corporation commented on the potential overreliance on the Standard Technical Specifications and concluded there was "... minor, if any, impact on the quality of the program and its results...."

MP&L maintains that it was appropriate to include the Standard Technical Specifications as a review resource. In fact their inclusion was necessary to establish the completeness of the Technical Specification Review Program. There is no evidence that the Standard Technical Specifications were overly relied upon in justifying changes to the Grand Gulf Technical Specifications, since the BWR/6 Standard Technical Specifications were not used as sole justification in determining the acceptability of the Grand Gulf Technical Specifications.

QUESTION NO. 3:

Did the Technical Specification Review Program seek to verify that Grand Gulf Technical Specification requirements were applicable for the specified plant operating modes?

RESPONSE NO. 3:

Consideration of mode applicability for specific systems, equipment, and instrumentation was clearly a part of the Technical Specification Review Program. Procedure TS-1 required the NSSS/BOP reviewer to:

"Evaluate action statement mode change requirements (up and down) to ensure operation consistent with analysis."

"Ensure LCO's reflect the lowest functional capability or performance levels of equipment required for safe operation of the facility based on design analysis. Ensure that the Limiting Condition for Operation (LCO) contains the quantity of equipment required prior to taking analyzed single failure."

Questions 2 and 4 of the NSSS/BOP Technical Specification Review Checklist required the reviewer to document that consideration was given to procedure TS-1 requirements relating to mode applicability.

The Lead Review Organizations, using the FSAR and supporting documentation, the SER, the BWR/6 Standard Technical Specifications, the design analyses documentation, determined whether the Grand Gulf Technical Specifications adequately addressed applicable operating modes for specific systems, equipment, and instrumentation. Bechtel and General Electric have both stated that mode applicability was clearly and logically part of their reviews. General Electric, elaborating on the subject, has stated that:

"During the generation of BWR Standard Technical Specifications, General Electric worked closely with the NRC to define operating modes and establish their applicability to specific systems, equipment, and instrumentation."

"Applicable operating modes for systems, equipment, and instrumentation are, in principal, generic to all recent BWR product lines (BWR/4, 5, and 6), receiving scrutiny whenever a plant specific set of Technical Specifications is prepared. Therefore, the initial mode applicability determinations for previously and most recently licensed plants have valid applications to Grand Gulf."

Licensed Grand Gulf Nuclear Station SRO's were members of the NSSS/BOP Onsite Review Team and participated in the review of Lead Review Organization comments. One of the prime elements of the SRO's review was consideration of operating mode applicability.

During the Onsite Review Team meetings with the Lead Review Organization reviewers, the question of mode applicability was repeatedly addressed, and resulting comments were documented in the review packages and in TSPS, if required. Mode applicability was considered yet again when RPD conducted their final review of the review packages and TSPS. RPD's final review provided additional assurance that the systems, equipment, and instrumentation addressed in the Technical Specifications would be available in the appropriate operating mode to ensure defense-in-depth.

In summary MP&L is confident that the Technical Specification Review Program effectively verified that Grand Gulf Technical Specification requirements are applicable for the specified plant operating modes.

QUESTION NO. 4:

Did the Technical Specification Review Program seek to identify additional Grand Gulf unique features that should be in the Grand Gulf Technical Specifications and presently are not?

RESPONSE NO. 4:

An important objective of the Technical Specification Review Program was to assure that all safety significant Grand Gulf unique design features were appropriately included in the Technical Specifications. Procedure TS-1 contained numerous review elements to accomplish this purpose; the reviewer was required to examine the FSAR and supporting documents, the SER, the underlying safety analyses, and as-built documentation to ensure that Grand Gulf unique features were identified and properly addressed in the Technical Specifications.

Bechtel and General Electric, as architect-engineer and NSSS vendor, respectively, conducted engineering reviews of the Grand Gulf Technical Specifications (reference AECM-84/0229). Bechtel and General Electric have been continually involved in the engineering design, licensing, construction, and testing of Grand Gulf and were, therefore, uniquely qualified to perform the review. Bechtel assembled a review team dedicated to the Technical Specification Review Program and built around a core of Bechtel engineers having extensive involvement with Grand Gulf throughout the life of the project. General Electric's reviews were conducted by the Lead System Engineer for each of the NSSS Technical Specifications. Within General Electric's organization, the Lead Systems Engineer is the final authority on the design features and requirements for his/her assigned system.

Licensed Grand Gulf Nuclear Station SRO's were members of the Onsite Review Team, which reviewed the Lead Review Organization review packages with Bechtel and General Electric engineers. The SRO's provided operational insight and detailed system-specific and integrated plant design knowledge. Nuclear Plant Engineering engineers, having knowledge of system and plant design requirements, industry practices, and regulatory requirements also served as members of the Onsite Review Team. The SRO and Nuclear Plant Engineering members of the Onsite Review Team augmented the Bechtel and General Electric knowledge of Grand Gulf. Each of the reviewers drew on their knowledge, background, training, and experience in working with Grand Gulf Technical Specifications, FSAR and supporting documents, SER, as-built documentation, and underlying safety and design analyses to ensure the Grand Gulf unique features were addressed during the Technical Specification Review Program.

RPD considered comments and TSPS documented in Lead Review Organization review packages. RPD was composed of a group of engineers, technicians, former SROs, and supervisors who had detailed knowledge and experience with Grand Gulf design, licensing, testing, and operation. Items identified for inclusion in the Grand Gulf Technical Specifications were reviewed by RPD using internal working guidelines established by them to define the scope and depth of the contents of the Technical Specifications. The formulation of these guidelines involved consideration of 10CFR 50.36, and the guidelines were endorsed by the Technical Specification Review Program Steering Committee. Proposed additions to the Technical Specifications were reviewed against the following classifications contained in the guidelines:

- o Class 1 - system or functions which require Technical Specification compliance to assure plant remains within safe limits. This class assures continued integrity of the multiple barriers preventing radioactive releases; i.e., fuel matrix, fuel cladding, reactor coolant pressure boundary, and containment.
- o Class 2 - systems or functions relied upon in the event one or more limiting conditions are exceeded, limiting further penetration of the physical barriers to radioactive releases. Class 2 systems backup Class 1 systems. Class 2 systems mitigate or manage the effects of postulated accidents.
- o Class 3 - systems or functions relied upon to limit the release of radioactivity in the event multiple barriers to radioactive release are penetrated. Class 3 systems or functions provide long-term management of accident conditions.
- o Class 4 - systems or functions relied upon to support safety-related systems or functions.
- o Class 5 - systems or functions not appropriate from inclusion in the Grand Gulf Technical Specifications.

Additional assurance that Grand Gulf unique features were identified during the Technical Specification Review Program was provided by the Unique Features Review, which is discussed in more detail in Attachment 2 to this submittal. Briefly, the confirmatory Unique Features Review resulted in the identification of no additional safety significant unique features which required inclusion in the Grand Gulf Technical Specifications. MP&L concludes, therefore, that the Technical Specification Review Program thoroughly and diligently addressed Grand Gulf unique features which needed to be included in the Technical Specifications.

REPORT ON THE GRAND GULF NUCLEAR STATION UNIQUE FEATURES REVIEW

I. INTRODUCTION

During their Third Party Review of the Technical Specification Review Program, Impell Corporation recommended that a discrete review of Grand Gulf Nuclear Station unique design features be performed by MP&L to provide additional assurance regarding the completeness of the Technical Specification Review Program (reference AECM-84/0235, dated April 16, 1984). At the April 4, 1984, meeting between the NRC and MP&L, MP&L informed the NRC that a confirmatory Unique Features Review was being performed consistent with the recommendation of Impell Corporation. This report documents the completion and results of that effort.

The purpose of the Unique Features Review was to identify Grand Gulf Nuclear Station unique design features and confirm that these features are adequately addressed in the Grand Gulf Technical Specifications. To accomplish this purpose, the design of Grand Gulf Nuclear Station (BWR/6, Mark III) was compared to the design of Hanford 2 Nuclear Station (BWR/5, Mark II), and Grand Gulf unique design features were identified. A determination was made regarding whether the unique design features were adequately addressed in the Grand Gulf Technical Specifications.

II. ORGANIZATION OF REVIEW EFFORT

MP&L was responsible for the implementation and effective execution of the Unique Features Review. The effort was directed by the Manager of Nuclear Plant Engineering and supported by Bechtel and General Electric from their Gaithersburg and San Jose offices, respectively. The foundation of the review process was the review program and criteria mutually developed by MP&L, Bechtel, and General Electric. The review was performed using the division of responsibility agreed upon by these same organizations.

Experienced Bechtel and General Electric engineers were dedicated to the Unique Features Review effort. Overseeing the Bechtel activities was the Project Engineer, whose functions were to provide guidance, insure compliance with the objectives of the program, and coordinate all internal activities. Overseeing the General Electric activities were the Technical Specification Program Manager and the NSSS Project Manager with functional responsibilities for the review similar to those stated above for Bechtel. The results of the Unique Features Review were documented by Bechtel and General Electric and provided to MP&L.

III. REVIEW METHODOLOGY

The Unique Features Review consisted of four phases, which were to be implemented as follows. During Phase 1, the Grand Gulf Nuclear Station and Hanford 2 Nuclear Station Final Safety Analysis Reports (FSAR) were to be systematically compared to identify those design features unique to a BWR/6, Mark III. The Hanford 2 Nuclear Station was selected as the basis for comparison since it represents a recently licensed BWR/5, Mark II (full power operating license on March 30, 1984). Attention was also to be focused on the identification of unique design features associated with the transient and accident responses discussed in Grand Gulf FSAR Chapter 15.

Unique features identified during Phase 1 were to be further evaluated during Phase 2 to determine whether such features represented potential candidates for inclusion in the Grand Gulf Technical Specifications. If so, a determination was to be made whether the Grand Gulf Technical Specifications or, as an alternative, the Technical Specification Review Program (TSRP) had previously addressed the subject items. If not addressed in the Technical Specifications or previously during the TSRP, the unique feature was to be evaluated during Phase 3 to assure that the FSAR accurately described the feature. This was to be accomplished via a review of relevant design and as-built documentation.

During Phase 4, RPD was to determine whether the unique feature should be included in the Grand Gulf Technical Specifications and, if so, the depth and scope of that inclusion, using guidelines previously established during the Technical Specification Review Program. These guidelines were formulated based upon consideration of the requirements of 10 CFR 50.36 and were endorsed by the Technical Specification Review Program Steering Committee. The phased approach described above is discussed in further detail in the following sections of this report.

A. Phase 1 - Identification of Unique Design Features

Phase 1 was to consist of the comparison of the Grand Gulf Nuclear Station and Hanford 2 Nuclear Station FSAR's to identify those design features unique to the design of a BWR/6, Mark III. As previously mentioned, attention was also to be focused on the identification of unique design features associated with the accident and transient responses discussed in Grand Gulf FSAR Chapter 15. A unique feature, for the purpose of the comparison, was defined as a basic design feature, NSSS or BOP, representative of the BWR/6, Mark III design philosophy, i.e., those systems which do not exist or have evolved so as to be virtually unrecognizable in the BWR/5, Mark II design. Differences in number of components, equipment capacities, and other detailed differences were not considered to represent a unique design feature.

The comparison was to be performed on a system level; however, the individual reviewer was to have the ability to expand the depth of the review to the degree to which additional review was warranted, based on engineering judgement. Documentation associated with this phase was to consist of a list of Grand Gulf and Hanford 2 FSAR sections reviewed and unique design features identified.

The comparison of the Grand Gulf and Hanford 2 FSAR's was to be performed in accordance with the division of responsibility agreed upon by MP&L, Bechtel and General Electric. Several sections of the Grand Gulf FSAR were not likely to contain a unique feature and, therefore, were not to be evaluated as part of this comparison. These sections were not to be reviewed specifically because they:

- ° contained descriptions of analytical methodologies, exclusive of FSAR Chapter 15 (e.g., FSAR Appendix 3B);
- ° presented general design, licensing, or construction information which was provided in greater detail in FSAR sections evaluated as part of the unique feature review (e.g., FSAR Section 1.2);
- ° discussed activities which are outside the scope of the Grand Gulf Technical Specifications (e.g., startup and preoperational testing, as described in FSAR Chapter 14); or
- ° provided references (e.g., FSAR Section 2.3.6).

B. Phase 2 - Screening of Unique Features

Unique features identified in Phase 1 were to be screened to determine those features which represented potential candidates for inclusion in the Grand Gulf Technical Specifications considering the following classifications developed by MP&L during the Technical Specification Review Program. The requirements of 10 CFR 50.36 were considered in the formulation of these classifications.

- ° Class 1 - the systems/functions which require Technical Specification compliance to assure the plant remains within safe limits. This class assures continued integrity of the multiple barriers preventing radioactive releases.
- ° Class 2 - the systems/functions relied upon in the event one or more limiting conditions are exceeded, limiting further penetration of the physical barriers preventing radioactive releases. This class mitigates or manages the effects of postulated accidents.
- ° Class 3 - the systems/functions relied upon to limit the release of radioactivity in the event multiple barriers to radioactive release are penetrated. This class provides long-term management of accident conditions.

- ° Class 4 - the systems/functions relied upon to support safety-related systems/functions.

Unique features satisfying any of the above classifications were to be considered as representing potential candidates for inclusion in the Grand Gulf Technical Specifications. Subsequently, the reviewer was to determine if the unique feature was described in the Grand Gulf Technical Specifications or, as an alternative, had been addressed as part of the Technical Specification Review Program. If the unique feature was described in the Grand Gulf Technical Specifications or had been addressed during the Technical Specification Review Program, the reviewer was to reference the appropriate Grand Gulf Technical Specification describing the unique design feature or the Technical Specification Review Program documentation supporting such a determination.

If the unique feature was determined to represent a potential candidate for inclusion in the Grand Gulf Technical Specifications but was not addressed in the Technical Specifications or during the Technical Specification Review Program, the reviewer was to provide a basis for the inclusion or exclusion of the unique design feature in the Grand Gulf Technical Specifications and proceed to the Phase 3 evaluation.

The results of the Phase 2 activities were documented and included the information described above.

C. Phase 3 - Verification of Unique Features

Those unique features determined to represent potential candidates for inclusion in the Grand Gulf Technical Specifications and not addressed in the Technical Specifications or during the Technical Specification Review Program were to be evaluated to determine the accuracy of their description in the FSAR. This evaluation was to be accomplished via a review of appropriate design and as-built documentation, including but not limited to drawings, specifications, and calculations.

If the reviewer determined that the unique feature was correctly described in the Grand Gulf FSAR, the Phase 3 verification was to be considered complete. If the reviewer determined that the FSAR incorrectly reflected the unique feature, FSAR revisions were to be recommended and justified, and FSAR pages were to be marked-up to reflect the necessary revisions.

If the reviewer determined that a plant walkdown was required to provide additional assurance that the unique feature was correctly represented in the FSAR and design and as-built documentation, MP&L Nuclear Plant Engineering was to be notified. All walkdowns were required to be performed by MP&L Nuclear Plant Engineering, and the results of the walkdowns were to be provided to the requesting Bechtel or General Electric reviewer.

Documentation for Phase 3 was to consist of a description of the unique design feature, references to the appropriate FSAR sections and design documents, a determination of FSAR accuracy, and the results of walkdowns, if required.

D. Phase 4 - Technical Specifications Evaluation

Subsequent to the completion of Phases 1, 2, and 3, RPD was to review the documentation provided by Bechtel and General Electric to determine if the Grand Gulf Technical Specifications required revision to include any unique design feature not already addressed during the Technical Specification Review Program, and if so, to what extent. Upon determination by RPD that the Grand Gulf Technical Specifications required revision to include unique design features, such revisions were to be processed and prioritized consistent with the Technical Specifications Review Program.

IV. RESULTS

The results of the Unique Features Review are summarized below. Briefly, no unique design features were identified during this effort which were not previously addressed during the Technical Specification Review Program.

A. Phase 1

Bechtel and General Electric identified 35 unique design features during their Phase 1 reviews. These unique features included such items as the:

- ° Feedwater Leakage Control System
- ° Suppression Pool Makeup System
- ° Rod Control Information System
- ° Hydrogen Igniter System

B. Phase 2

All unique features identified during Phase 1 were evaluated during Phase 2 to determine if any were potential candidates for inclusion in the Grand Gulf Technical Specifications. The reviewer determined whether the unique feature was either described in the Grand Gulf Technical Specifications or addressed during the Technical Specification Review Program. Of the unique features identified during Phase 1 and determined to be potential candidates for inclusion in the Technical Specifications, there were no unique features in the Grand Gulf FSAR which previously had not been addressed during the Technical

Specification Review Program. Additionally, based on the treatment of FSAR Chapter 15, there were no unique features credited in accident and transient responses which previously had not been addressed during the Technical Specification Review Program.

C. Phase 3

Since Phase 2 did not result in the identification of any unique features not previously addressed during the Technical Specification Review Program, this phase was not implemented. However, the two potential FSAR inaccuracies identified by General Electric during their Phase 1 comparison of the Grand Gulf and Hanford 2 FSAR's were further evaluated against appropriate design and as-built documentation to determine their significance. Specifically, FSAR Tables 9.1-2 and 9.1-3 were determined to require revision to accurately reflect the safety classification and seismic design of fuel servicing equipment and reactor vessel servicing equipment. General Electric provided MP&L with justifications for the proposed revisions and marked-up FSAR pages. MP&L determined these changes to have no safety significance and is processing these in accordance with approved procedures. The revisions to the FSAR will be incorporated into a 1984 FSAR amendment.

D. Phase 4

As with Phase 3 above, Phase 4 was not required and, therefore, not implemented.

V. CONCLUSIONS

The Unique Features Review resulted in the identification of no Grand Gulf BWR/6, Mark III unique design features not already addressed in the Grand Gulf Technical Specifications. Therefore, MP&L concludes that the successful completion of the Unique Features Review provides further assurance that the Technical Specification Review Program effectively addressed Grand Gulf unique design features.