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NUCLEAR LICENSING & SAFETY DEPARTMENT

July 28, 1984

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 & 50-417
License No. NPF-13
File: 0260/L-860.0
Division 1 and 2 TDI Diesel
Generators
AECM-84/0410

The NRC staff has recently completed its review of the information submitted by MP&L regarding the reliability of the Division I and II TDI DGs installed at GGNS Unit I. This information includes MP&L submittals AECM-84/103, AECM-84/0240, AECM-84/0241, AECM-84/0373, and AECM-84/0386. MP&L submitted AECM-84/0345 on July 5, 1984, providing the results of the inspections, tests, and "as-manufactured" qualification review specified in the NRC staff's Order dated May 22, 1984. Based upon the results of MP&L's activities related to that Order, MP&L informed the NRC staff on July 18, 1984 (AECM-84/0350), of its conclusion that the GGNS Unit I TDI DGs meet the on-site emergency power supply reliability requirements of GDC-17 and that with the exception of the torsionograph testing, all requirements of the Order had been met. As a result, MP&L further requested that the May 22, 1984 Order be rescinded. The successful completion of the torsionograph testing was reported in the MP&L letter dated July 26, 1984 (AECM-84/0386).

In reaching its conclusion regarding the conformance of the GGNS Unit I TDI DGs to the reliability requirements of GDC-17, MP&L relies upon the following facts:

- o Each of the GGNS Unit I TDI DGs have been inspected at least once, with satisfactory results.
- o The Division I TDI DG has recently been inspected and tested in accordance with the requirements of the NRC staff and its consultants (i.e., in accordance with the requirements of the May 22, 1984 Order) with excellent results.

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- o The operational performance of the GGNS Unit I TDI DGs, both in terms of successful starting and demonstrated load carrying capability, has been excellent.
- o Due to the fact that the load carrying capability of the GGNS Unit I TDI DGs is significantly greater than that required by the regulations, these DGs can and will be operated under conditions which result in loads and stresses on critical engine components which are much less than those for which the engine components have been designed.
- o MP&L has instituted a surveillance and maintenance program for the GGNS Unit I TDI DGs which far exceeds regulatory requirements for diesel generators at nuclear power plants and which assure that there will be early detection of any potential problem.

In sum, evidence related to the specific TDI DGs installed at GGNS Unit I indicates that they, in fact, are highly reliable and that such reliability assures conformance with GDC-17.

As indicated in previous correspondence to the NRC staff (e.g., AECM-84/0271), MP&L has committed to, prior to restart from the first refueling outage, implement (as appropriate) the findings from the NRC review of the TDI DG Owners Group resolution. MP&L believes that this commitment is confirmatory in nature and that it should not be construed as indicating any lack of confidence in the reliability of the GGNS Unit I TDI DGs. It is MP&L's understanding that the NRC staff will recommend that this commitment be reflected as a condition of the FPOL for GGNS Unit I. MP&L has no objection to such a recommendation.

Neither the NRC staff nor MP&L can conclude today whether some future technical requirement, which is unknown but might arise from the TDI DG Owners Group findings. There is presently no requirement from which an exemption is needed. The basis for such an exemption cannot be shown since the basis for non-compliance with a possible future requirement cannot be shown.

MP&L further understands that the NRC staff is also currently considering whether an exemption to GDC 17 (with respect to the reliability of the GGNS Unit I TDI diesel generators) is required for authorization of full power operations. Based on the information previously provided to the NRC staff, as

summarized above, MP&L does not believe that an exemption to GDC-17 related to the reliability of the GGNS Unit 1 TDI DGs is necessary or appropriate. Nonetheless, if the NRC staff cannot reach a similar conclusion, MP&L believes that sufficient information has been presented in previous submittals and herein to demonstrate that the standards of 10 CFR 50.12(a) have been met.

Sincerely,

S N Hobbs

for

Larry F. Dale
Director, Nuclear Licensing & Safety

LFD/sad

cc: Mr. J. B. Richard
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