

**ENERFAB**™

BISHOPRIC PRODUCTS/W.J. WOOLLEY

ENERFAB CORPORATION • 4955 Spring Grove Avenue • Cincinnati, Ohio 45232

513/641-0500 • telex 214494

March 29, 1985

50-416/417

U. S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Washington, DC 20555

Attention: Robert L. Baer, Chief  
Engineering and Generic Communications Branch  
Division of Emergency Preparedness & Engineering Response  
Office of Inspection and Enforcement

Subject: W. J. Woolley Company Personnel Air Locks  
Seismic Qualification of Pneumatic Supply System  
Grand Gulf Nuclear Station - Unit 1

Reference: 1) November 28, 1984 Letter from R. L. Baer to  
E. Rountree (ENERFAB)  
2) October 3, 1984 Letter from L. F. Dale (M P & L)  
to J. P. O'Reilly (USNRC)

Gentlemen:

In accordance with your request in the Reference 1) letter, please be advised that we have reviewed the design of all W. J. Woolley Company inflatable seal personnel air locks and determined that all of the units do have seismically qualified pneumatic supply systems.

The situation which existed at the Grand Gulf Nuclear Station (Reference 2) was, in fact, an isolated case; and as such, we can report that this is not a potential generic problem with the seismic qualification of pneumatic supply systems on W. J. Woolley Company inflatable seal personnel air locks.

8504040280 850329  
PDR ADOCK 05000416  
S PDR

IE19  
1/1

U. S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
March 29, 1985  
Page 2

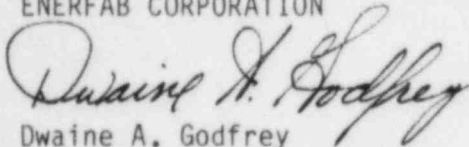
It should be noted that as a result of a joint effort between the Mississippi Power & Light Company, the owner's A/E, and the Woolley Company, the pneumatic supply system for the Grand Gulf air lock, has subsequently been seismically qualified and that this matter has, therefore, been resolved.

As a point of clarification, ENERFAB would like to note that the "upgrade" referred to in Reference 2) was intended to implement the requirements of both 10CFR 50 Appendix A and ANSI-N-271-1976.

We trust this information provides sufficient verification required to support your final action on this issue.

Very truly yours,

ENERFAB CORPORATION



Dwaine A. Godfrey  
President

DAG/sls

encls: References 1) & 2)

cc: Mr. L. F. Dale, Director  
Mississippi Power & Light Company  
P. O. Box 1640  
Jackson, Mississippi 39205



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

REFERENCE 1  
REC'D  
12-3-89

NOV 28 1984

Enerfab  
ATTN: Mr. E. Roundtree  
4955 Spring Grove Avenue  
Cincinnati, Ohio 45232

Gentlemen:

Mississippi Power and Light Company's (MP&L) letter of April 20, 1984 (Enclosure 1), reported a problem with the seismic qualification of pneumatic supply system to the containment personnel air lock seals at their Grand Gulf Nuclear Station Unit 1.

Since similar systems are to be used at other nuclear power sites, the Office of Inspection and Enforcement was asked to look into the potential for this being a generic issue at other facilities. For this reason, on June 11, 1984, Mr. Richard J. Kiessel, of my staff, spoke with Mr. R. A. Maffei, then an employee of W. J. Woolley Company. Based on his assurances that the upgraded systems sold to the other facilities were seismically qualified, I concluded that there was no need for further action with respect to the generic aspects of this issue (Enclosure 2).

Subsequent to receiving a copy of my internal memorandum addressing my conclusions, MP&L attempted to determine why their pneumatic supply system was not handled in a manner consistent with the other facilities. Their letter of October 3, 1984 (Enclosure 3) states their belief that there had been a misunderstanding between Messrs. Kiessel and Maffei as to the nature of the "up-grade" which had been provided to the other facilities. Thus, they concluded that the systems installed at the other facilities may not be seismically qualified. In addition, they recommended that I should reconsider my decision with respect to the generic nature of this issue.

During your November 14th conversation with Mr. Kiessel, you stated that the upgraded systems provided to the other facilities were, in fact, seismically qualified. You also indicated that you would provide written confirmation of this, if so requested in writing.

8412120189 239.

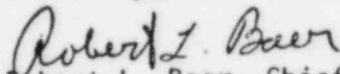
NOV 28 1984

Enerfab

-2-

Since the public record on this issue contains written concerns raised by MP&L, I feel that it is appropriate to base our final action on this issue on a similar level of documentation. Therefore, I am accepting your offer to provide such written verification that the systems provided to the other nuclear facilities were seismically qualified.

Sincerely,



Robert L. Baer, Chief  
Engineering and Generic Communications Branch  
Division of Emergency Preparedness  
and Engineering Response  
Office of Inspection and Enforcement

Enclosures:

- 1) MP&L letter to NRC Region II dated April 20, 1984
- 2) My memorandum to Richard C. Lewis dated June 12, 1984
- 3) MP&L letter to NRC Region II dated October 3, 1984



MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

October 3, 1984 OCT 5 P 1:26

NUCLEAR LICENSING & SAFETY DEPARTMENT

U.S. Nuclear Regulatory Commission  
Region II  
101 Marietta St., N.W., Suite 2900  
Atlanta, Georgia 30323

Attention: Mr. J. P. O'Reilly, Regional Administrator

Dear Mr. O'Reilly:

SUBJECT: Grand Gulf Nuclear Station  
Units 1 and 2  
Docket Nos. 50-416 and 50-417  
License No. NPF-13  
File: 0260/15525/15526  
PRD-84/08, Containment and Drywell  
Personnel Air Lock Seismic  
Qualification  
AECM-84/0456

References: (1) AECM-84/0237, 4/20/84  
(2) AECM-84/2-0010, 6/8/84  
(3) AECM-84/0337, 6/21/84  
(4) June 12, 1984, Letter from R. L. Baer to R. C. Lewis

Mississippi Power & Light Company (MP&L) provided a final report for Grand Gulf Nuclear Station (GGNS) Units 1 and 2 for a Reportable Deficiency identified as PRD-84/08 in Reference (3). The deficiency concerned a failure of the vendor, W. J. Woolley Co., to seismically qualify the personnel air locks pneumatic supply system. As stated in Reference (3) the air lock and its associated components were specified to be seismically qualified by the supplier per GGNS Specification 9645-C-153.0. However, contrary to the specification, it was determined that the personnel air locks pneumatic supply system (tubing, supports, and instrumentation) between the check valve upstream of the accumulators and the seals had not been qualified.

MP&L recently received a copy of the NRC internal correspondence of Reference (4). It concerned the potentially generic problem at Grand Gulf regarding the seismic qualification of the containment and drywell personnel air locks. The NRC internal correspondence indicated per conversations with W. J. Woolley Company personnel that Grand Gulf was the last site to upgrade their air lock air system to seismic qualifications.

After receiving the NRC internal correspondence, MP&L requested the GGNS Architect-Engineer (A/E) to investigate the reason why the deficiency concerning the seismic design of the airlock air system had not been handled consistent with other nuclear plants. As a result of this investigation, it appears that there has been a misunderstanding based on the communications between the NRC and W. J. Woolley concerning the GGNS Part 21 report (Reference 3) and the "upgrade" of the air lock air system referred to in the NRC internal correspondence.

841160621 288



The "upgrade" Woolley refers to was presented to our A/E in 1978, not to meet seismic requirements but as a "new design" which simplified the previous design and incorporated the requirements of ANSI-N-271-1976 "Containment Isolation Provisions for Fluid Systems," which was not required for Grand Gulf. Our A/E rejected the proposal and chose to retain the issued contract and specification (9645-C-153.0) requirements which has always specified seismically qualified air locks.

Conversations between our A/E and Mr. R. A. Maffei (now with Danley Manufacturing Co.) concerning his discussion with the NRC resulted in some confusion on Mr. Maffei's part as to how this "upgrade" was presented to the various projects and the reason for it. Mr. Maffei indicated that his recounting of the situation was somewhat hampered by his lack of access to past Woolley records.

MP&L and our A/E feel that the NRC should consider a reevaluation of the Part 21 report submitted by MP&L for potential generic effects on other plants. Installation of the modified system does not insure that the air lock systems installed at other plants were seismically qualified. The deficiency reported by MP&L was caused by the failure of the vendor to supply seismically qualified equipment as specified, not by our A/E's rejection of the "upgraded" or "modified" system.

This letter also serves to document a September 20, 1984 telephone conversation between S. H. Hobbs and E. B. Shingleton of MP&L and Mr. R. E. Carroll of the NRC.

Yours truly,



L. F. Dale  
Director

EBS/SHH:rg

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

Mr. Richard C. DeYoung, Director  
Office of Inspection & Enforcement  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555