



ENTERGY

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March 27, 1996

U.S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Grand Gulf Nuclear Station Unit 1
Docket No. 50-416
License No. NPF-29
Reply To A Notice Of Violation
Failure To Provide Appropriate Procedure
For Calibration of the Hydrogen Analyzers
Report No. 50-416/95-21-02 (GNRI-96/00052), dated 02/26/96

GNRO-96/00030

Gentlemen:

Entergy Operations, Inc. hereby submits the response to Notice of Violation 50-416/95-21-02.

Yours truly,

CRH/CDH

attachment

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Notice of Violation 95-21-02

Technical Specification 5.4.1.a states, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978. Section 8 of Regulatory Guide 1.33 states, in part, that specific procedures for surveillance tests should be written.

Contrary to the above, Procedure 06-IC-1E61-Q-1004, "Containment and Drywell Hydrogen Analyzer Calibration", was established and implemented to provide a written instruction for surveillance testing of the hydrogen analyzers, and this procedure contained deficient instructions, from November 1992 until December 1995, for testing the analyzers. Specifically, the procedure directed that reagent gas flow be adjusted to the previous test value prior to obtaining as-found calibration data.

I. Admission or Denial of the Alleged Violation

Entergy Operations, Inc. admits to this violation.

II. The Reason for the Violation, if Admitted

The cause of this condition was an inadequate calibration procedure for the containment and drywell hydrogen analyzers. Procedure 06-IC-1E61-Q-1004, "Containment and Drywell Hydrogen Analyzer Calibration," required that technicians check reagent gas flow prior to the analyzer calibration and adjust flow to the previous setting prior to obtaining as-found calibration data. Therefore, the effect of reagent flow variations on indicated hydrogen concentration was not recorded. This step of the calibration was incorporated when the procedure was changed in December, 1992. The technical review related to this procedure change did not fully evaluate the consequences of the change.

III. Corrective Steps Which Have Been Taken and Results Achieved

- A more intensive review of hydrogen analyzer calibration records was initiated by plant personnel which concluded that the drift on the A hydrogen analyzers would have adversely affected indication above hydrogen concentrations of 3 percent.
- A material nonconformance report (MNCR) was generated to document the drifting problems. From a review of the data contained in the MNCR, it was determined that both trains of analyzers were never inoperable at the same time in excess of 7 days nor was a single channel inoperable for 30 days.
- Work packages were generated to replace the regulators and check valves which control reagent and calibration gas flows. Existing needle valves for adjusting reagent gas flow were also replaced with more suitable needle valves.

- A change was issued to the hydrogen analyzer calibration procedure to ensure as-found hydrogen concentration values are taken before adjustments are made to the reagent gas flow.

IV. Corrective Steps to be Taken to Preclude Further Violations

- Reinforce with engineers the expectations on trending Technical Specification instruments and responding to feedback from craft and supervisors.
- Subsequent weekly checks of the analyzer reagent gas flow have shown little deviation from previously set values. Monitoring will be continued until analyzer reagent gas flow reliability has been established.
- As-found data collection criteria will be reviewed for adequacy. This criteria will be used when procedure technical reviews are performed. All technical reviewers will be informed of the revised/developed criteria.

V. Date When Full Compliance Will be Achieved

The above actions shall be completed by July 24, 1996.