



# MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

August 31, 1984

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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  
Unit 1  
Docket No. 50-416/  
License No. NPF-13  
File 15524/15521  
Report No. 50-416/84-21, dated  
August 2, 1984 (MAEC-84/0278)  
AECM-84/0440

This is in response to your letter to Mississippi Power & Light Company from Richard C. Lewis, dated August 2, 1984.

Attached are the responses to the Notice of Violation enclosed with the letter.

With regard to the concern about the Quality Assurance (QA) program, MP&L will improve the efficiency of the quality organizations and become more effective in implementation of the quality assurance program. A study is in progress to identify better methods to accomplish this. The results of any proposed changes will be discussed with Region II personnel prior to implementation.

Should you have any questions, please contact my office.

Yours truly,

*L. F. Dale*  
L. F. Dale  
Director

RLS/SHH:lm  
Attachments

cc: Mr. J. B. Richard (w/a)  
Mr. R. B. McGehee (w/o)  
Mr. N. S. Reynolds (w/o)  
Mr. G. B. Taylor (w/o)

8410240034 840924  
PDR ADOCK 05000416  
Q PDR

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

Member Middle South Utilities System

RESPONSE TO NRC VIOLATION 416/84-21-03

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Mississippi Power & Light Company (MP&L) admits to the alleged violation; however, there was no effect on the health or safety of the public.

II. REASON FOR THE VIOLATION IF ADMITTED

The reason for the violation is the failure to recognize the necessity for incorporating into the Nuclear Plant Engineering Administrative Procedures (NPEAP) sufficient detail to explicitly express the implementation of Section 3.5.6 of the MP&L Quality Assurance Program, such that it could be clearly ascertained that requirements for inspections are addressed in the performance of design reviews.

III. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

NPEAP Change Requests have been approved and issued for NPEAP 01-304 and 01-306 that provide clarification on the implementation of Section 3.5.6 of the MP&L Quality Assurance Program.

The result of this action is that the NPEAPs clearly implement Section 3.5.6 of the MP&L Quality Assurance Program; the procedures clearly address requirements for inspections in design reviews; and, assurance is provided that design reviews address requirements for inspection.

IV. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

No further action is required. Activities affecting quality are prescribed by procedures, and these procedures explicitly implement the MP&L Quality Assurance Program.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved with the issuance of NPEAP Change Requests for NPEAP 01-304 and 01-306 on July 7 and July 24, 1984.

RESPONSE TO NRC VIOLATION 416/84-21-04

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Mississippi Power & Light Company (MP&L) admits to the alleged violation; however, there was no effect on the health or safety of the public.

II. REASON FOR THE VIOLATION IF ADMITTED

The reason for the violation is the failure to understand that the requirement for documenting errors was applicable prior to approval of the design process item/activity by the Manager of Nuclear Plant Engineering.

III. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

A NPEAP Change Request has been approved and issued for NPEAP 01-201 which requires the utilization of a Corrective Action Request form to document deficiencies.

The result of this action is that NPEAPs clearly implement MP&L Operational Quality Assurance Program requirements for documentation and corrective action of nonconformities, deficiencies, and deviations; the procedures clearly address the utilization of a Corrective Action Request; and assurance is provided that errors and deficiencies in the design process are documented and corrective action taken to preclude repetition.

IV. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

No further action is required. The Nuclear Plant Engineering Administrative Procedures address the established practice of utilizing a Corrective Action Request form to document deficiencies.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved with the issuance of NPEAP Change Request for NPEAP 01-201 on July 3, 1984.

RESPONSE TO NRC VIOLATION 416/84-21-05

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Mississippi Power & Light Company (MP&L) admits to the alleged violation; however, there was no effect on the health or safety of the public.

II. REASON FOR THE VIOLATION IF ADMITTED

The reason for the violation is the failure to recognize the need for formal issuance of a procedure that adopted the plant staff procedure. Nuclear Plant Engineering (NPE) had informally adopted the plant staff procedure and considered this an adequate measure for the control of NPE procurement activities.

III. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

NPE Administrative Procedure 01-401, "Procurement of Material, Equipment and Services" was developed, approved, and issued which establishes measures for the control of procurement activities for engineering services procured by NPE.

The result of this action is the implementation of MP&L Quality Assurance Program requirements; establishment of the required procedure for NPE procurement activities; and assurance that NPE procurement activities are procedurally controlled.

IV. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

No further action is required. An NPE Administrative Procedure exists that establishes measures for the control of procurement activities for engineering services procured by NPE.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance was achieved with the issuance of NPEAP 01-401 on July 9, 1984.

RESPONSE TO NRC VIOLATION 416/84-21-06

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Mississippi Power & Light Company (MP&L) admits to the alleged violation; however, there was no effect on the health or safety of the public.

II. REASON FOR THE VIOLATION IF ADMITTED

At the time NPEAP 01-304 - Revision 6 was reviewed, Quality Assurance (QA) was of the opinion that adequate alternative controls/guidance existed in NPEAP 01-201 - Revision 1 regarding documentation of nonconformances.

III. CORRECTIVE STEPS WHICH HAVE BEEN TAKEN AND THE RESULTS ACHIEVED

1. QA performed a subsequent review of procedure NPEAP 01-201 and determined that the guidance was in-fact inadequate. Corrective Action Request No. 885 was issued by QA and the following corrective actions taken by NPE:

Advance Procedure Change Request (APCR)-0002, to NPEAP 01-201, Revision 1 was issued July 3, 1984 to provide additional direction to NPE personnel regarding the documentation of identified nonconformances using one of the following procedures:

- Quality Assurance Procedure (QAP) 16.10 - Corrective Action Request (CAR)
- Plant Administrative Procedure (PAP)-01-S-03-3 - Material Nonconformance Reports (MNCRs)
- Plant Administrative Procedure (PAP)-01-S-03-2 - Plant Quality Deficiency Reports (PQDRs)

2. The Acting Director, QA issued a memorandum on August 31, 1984 to all QA personnel stressing the importance of the quality review function and also to make individuals aware of NRC concerns regarding this matter.
3. MP&L Programs QA has increased the quality review staff through the acquisition of three additional reviewers. The three added reviewers represent the addition of substantial nuclear experience.

IV. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FUTURE VIOLATIONS

QA Procedure (QAP) 6.10 PERFORMANCE AND DOCUMENTATION OF REVIEWS, is currently being revised to provide additional guidance to QA reviewers. A new attachment (Checklist) has been developed and added to QAP 6.10 to assure that quality requirements/concerns are addressed during the review of procedures.

QA Procedure (QAP) 2.40 INDOCTRINATION AND TRAINING OF QA PERSONNEL, is currently being revised to provide more stringent training of QA personnel participating in quality reviews.

Training sessions will be conducted and documented to orient quality reviewers within QA to the additional guidance in QAP 6.10 and QAP 2.40.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

MP&L Quality Assurance will issue QAPs 2.40, Revision 10 and QAP 6.10, Revision 15 by September 4, 1984. Training sessions will be completed by September 7, 1984.