



ENTERGY

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May 9, 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 Identify and Document the Repetitive Failures and Inaccurate Readings of
Pressure Indicator SZ51R002B In Accordance With Procedure 01-S-03-3
Report No. 50-416/96-08 (GNRI-96/00080), dated 04/11/96

GNRO-96/00056

Gentlemen:

Entergy Operations, Inc. hereby submits the response to Notice of Violation 50-416/96-08-01.

Yours truly,


CRH/CDH

attachment

cc:

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Notice of Violation 96-08-01

During an NRC inspection conducted on February 26 through March 25, 1996, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (60 FR 34381; June 30, 1995) the violation is listed below:

- A. Criterion V of Appendix B to 10 CFR Part 50 states, in part, that activities affecting quality shall be prescribed by documented procedures of a type appropriate to the circumstances and shall be accomplished in accordance with the procedures.

Procedure 01-S-03-3, "Material Nonconformance Reports," states, in part, that any individual or organization, including corporate and contract personnel, shall initiate a deficiency reporting document whenever a deficiency is discovered. Nonconformance reports must be used for all installed (declared operable or not) or previously installed (and declared operable) plant material nonconformances (416/9608-02).

Contrary to the above, a material nonconformance report was not initiated for a plant material nonconformance in that Air Conditioning Unit B Pressure Indicator SZ51RO02B had a history of repetitive failures and historically, even after the gauge was recalibrated, it did not reading (sic) accurately. As a result, this deficiency was not evaluated for the impact on operations personnel not being able to perform Step 3.14 of Off-Normal Event Procedure 05-1-02-V-9, "Loss of Instrument Air," because of an inaccurate pressure indicator.

I. Admission or Denial of the Alleged Violation

Entergy Operations, Inc. admits to this violation.

II. The Reason for the Violation, if Admitted

Failure to resolve the repetitive failures of an ONEP instrument was due to:

- The screening process and checklists provided in program procedures for corrective action/maintenance documents do not refer to Systems/Structures/Components assigned specific functions in plant Off Normal Event Procedures (ONEP).

III. Corrective Steps Which Have Been Taken and Results Achieved

- A temporary change (TCN) was issued for ONEP 05-1-02-V-9, "Loss of Instrument Air", to have condenser pressure read from the more reliable pressure indicators, SZ51-PIC-R008A or SZ51-PIC-R008B.
- MNCR 0045-96 was initiated to document the failure of pressure indicators SZ51R002A and SZ51R002B.
- QDR 0056-96 was initiated to document the conflicting information between Engineering Report 92/0033 and NPE's first disposition of MNCR 92/0028. These two documents gave conflicting information as whether to use indicator SZ51R002A/B or controller SZ51R008A/B to control pressure.

IV. Corrective Steps to be Taken to Preclude Further Violations

- Change the Component Database (CDB) to flag local instruments used for special purposes in the ONEPs and Emergency Procedures (EP).
- Develop a method that will ensure when local instruments are added or deleted from the ONEPs or EPs that the CDB is updated.
- Evaluate labeling the local instrumentation that is used in the ONEPs or EPs for special purposes.
- Review SOIs that may require additional information regarding local instrumentation used in the ONEPs or EPs for special purposes.
- Change 01-S-07-30, Evaluations of Equipment and Component Malfunctions, checklist to include devices assigned functions in the ONEPs and EPs.

V. Date When Full Compliance Will be Achieved

The above actions shall be completed by August 1, 1996.