



**ENTERGY**

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May 15, 1996

**C. R. Hutchinson**

Vice President  
Operations  
Grand Gulf Nuclear Station

U.S. Nuclear Regulatory Commission  
Mail Station P1-37  
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Grand Gulf Nuclear Station  
Docket No. 50-416  
License No. NPF-29  
Response to NRC Inspection Report 50-416/96-02

GNRO: 96/00058

Gentlemen:

We appreciated the recent opportunity to conduct an engineering self assessment as an alternative to a full scope NRC inspection. These cooperative efforts are important to us because they have the potential to lessen the regulatory impact/burden on both licensees and NRC staff while ensuring that the assessment area is thoroughly and appropriately evaluated.

We have completed review of NRC Inspection Report 50-416/96-02 containing the results of the inspection conducted to determine the effectiveness of our self assessment of the engineering and corrective action programs at GGNS. Overall, the inspection report fairly assesses the strengths, weaknesses, and opportunities for improvement of our engineering and corrective action programs.

Since the focus of self-assessments is broader than a compliance-based inspection, we were initially apprehensive concerning the inspection's ability to distinguish between self-assessment findings that constituted deficiencies (for which corrective action would be necessary) and self-assessment findings that were enhancement recommendations (which are outside the regulatory scope, and whose implementation would be elective). Our experience with the inspection and our review of the inspection report made it clear that the inspectors were sensitive to this concern and were able to discriminate between assessment findings within and without regulatory scope.

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Although we and the NRC expended more resources than we would have liked for this assessment/inspection effort, we believe such expenditure represents our common desire to do it right the first time. As we gain more experience, we anticipate that future self-assessment/inspection efforts will result in a net reduction of licensee and regulator resources.

One area of inspection focus merits clarification - our plans and actions regarding the valve stem on the reactor core isolation cooling (RCIC) pump turbine governor. The inspection report contains the misimpression that GGNS "did not plan to inspect or replace the valve stem...during the next outage." We also understand that this misconception was the subject of some discussion by the SALP Board.

As you know, GGNS received a copy of Region IV's inspection report of Terry Turbine activities in late 1995. GGNS was not the subject of the inspection report as we were not in Region IV when the inspection occurred. Upon receipt we initiated an immediate review to identify areas of improvement at Grand Gulf. This review was in progress during the engineering assessment/inspection in January, 1996.

During the course of the inspection, a GGNS engineer provided draft information to the NRC inspectors which gave the impression that we planned no action to address the RCIC stem corrosion issue. The draft was a work in progress that had not yet been reviewed by engineering management and did not reflect GGNS' position on the RCIC stem corrosion issue.

Although the details are not clear at this point, we believe that separately from the written draft information, we verbally provided to the inspectors, the resident inspector and some Region IV management the following information about our plans to resolve the stem corrosion issue:

- We had implemented a program of inspections and functional testing of the stem since September, 1994, based on operating experience at other Entergy Operations facilities.
- The stem must be replaced, however at the time of the inspection, engineering was evaluating appropriate stem materials to ensure that a replacement stem would not introduce similar or new failure mechanisms
- Replacement of the stem during the scheduled February RCIC outage (this is probably the "outage" referred to in the inspection report) was not possible due to long lead-time on stem replacements
- The stem would be replaced during the July, 1996 RCIC outage. Subsequently, we have determined to use Ferralium F-255 as the replacement stem material.

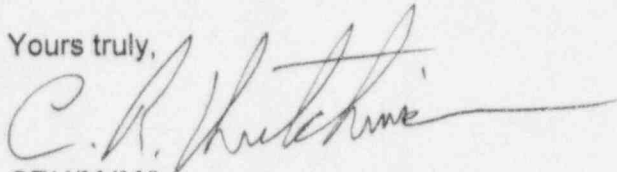
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We think this misunderstanding was a combination of reliance on early draft information, verbal information that may not have reached the correct parties, and schedule pressure that did not allow issuance and rebuttal of the inspection report prior to the SALP Board meeting. In any case, the GGNS response to the RCIC stem issue as documented in the inspection report is atypical of our approach to engineering issues, which is why we felt it worthwhile to correct this misunderstanding.

We appreciate the opportunity to provide feedback on this inspection report. And, as we've discussed in such forums as the January ANS/Region IV conference, we believe that it would be worthwhile to further discuss the self-assessment/inspection process to enhance safety and resource benefits in future joint efforts.

If you have any questions, please contact Mr. Danny G. Bost at (601) 437-6270.

Yours truly,



CRH/MJM/be  
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