



# MISSISSIPPI POWER & LIGHT COMPANY

*Helping Build Mississippi*

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May 7, 1985

## NUCLEAR LICENSING & SAFETY DEPARTMENT

U. S. Nuclear Regulatory Commission  
Office of Nuclear Reactor Regulation  
Washington, D. C. 20555

Attention: Mr. Harold R. Denton, Director

Dear Mr. Denton:

SUBJECT: Grand Gulf Nuclear Station  
Unit 1  
Docket No. 50-416  
License No. NPF-29  
File: 0260/L-860.0  
Submittal of Revised Fire Hazards  
Analysis and 10CFR50 Appendix R  
Fire Protection Review Summary  
Report  
AECM-85/0129

In late 1981, Mississippi Power & Light (MP&L) conducted a comparison of the Grand Gulf Nuclear Station (GGNS) fire protection program with its understanding of NRC requirements. (Appendix R to 10CFR50 was not directly applicable to plants such as GGNS which were licensed to operate after January 1, 1979.) The results of that review were documented in Table 9A-4 of the GGNS FSAR and forwarded to the Staff by letter of October 23, 1981. Subsequently, numerous meetings between industry and the NRC Staff were held in order to clarify the Appendix R requirements. These meetings resulted in several clarifying Staff documents (e.g., Generic Letter 83-33 and Information Notice 84-09) and in 1984 culminated in regional workshops conducted by the NRC Staff to provide industry with a full understanding of these requirements. (The guidance issued during these workshops, consolidated in Staff Generic Letter 85-01, is still undergoing Staff review and Commission affirmation.)

Subsequent to the workshops, based on the new clarifications of Appendix R, MP&L informed the NRC Staff that it would update its 1981 Appendix R comparison of the GGNS Fire Protection Program. MP&L has kept the NRC Staff informed of the progress of and schedule for this reanalysis, which is now essentially complete.

The results of MP&L's reanalysis are contained in two documents, 1) an updated GGNS Unit 1 Fire Hazards Analysis (FHA) and 2) a 10CFR50 Appendix R Fire Protection Review Summary Report. Ten (10) copies of each document are enclosed.

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These documents and actions noted therein are provided in response to MP&L's commitment set forth in its August 27, 1981 letter to comply with the requirements of Sections III.G, III.O and III.J of Appendix R, with "exceptions to be the justified on a case-by-case basis." In this regard, MP&L has provided in its Summary Report justifications for several exceptions to Section III.G of Appendix R for which NRC Staff review is requested. Further, the Summary Report reflects proposed modifications to four (4) fire areas that MP&L will make to bring them into compliance with MP&L's current understanding of the literal requirements of Section III.G of Appendix R. In this regard, to avoid delays in the finalization of the process, the FHA was revised assuming completion of the modifications. Areas where modifications are proposed are clearly identified in the Summary Report.

Significantly, the modifications in all cases provide an increase in fire protection above that reflected in the GGNS Fire Protection Program. In this regard, the enclosed FHA supercedes the FHA referenced in Appendix 9A of the GGNS FSAR.

Should you have any questions regarding the enclosed information, MP&L is available to discuss the attached documents at your request.

Yours truly,



L. F. Dale  
Director

MLC/JGC:vog  
Attachments

cc: Mr. J. B. Richard (w/a)  
Mr. O. D. Kingsley, Jr. (w/a)  
Mr. R. B. McGehee (w/a)  
Mr. N. S. Reynolds (w/a)  
Mr. G. B. Taylor (w/o)  
Mr. R. C. Butcher (w/a)

Mr. James M. Taylor, Director (w/a)  
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In accordance with the requirements of 10 CFR 170 an application fee of \$150 is attached.