



MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

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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: Dr. J. Nelson Grace, Regional Administrator

Dear Dr. Grace:

SUBJECT: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-29
File: 15521/15524
Report No. 50-416/85-02, dated
February 19, 1985 (MAEC-85/0054)
AECM-85/0095

This is in response to your letter dated February 19, 1985, which contains a Notice of Violation for violations 50-416/85-02-01 and 50-416/85-02-03. The response to violation 50-416/85-02-01 is attached. The response to violation 50-416/85-02-03 will be submitted on March 25, 1985, as discussed with Mr. Virgil Brownlee of your office on March 19, 1985.

Should you have any questions, please contact my office.

Yours truly,

L. F. Dale
Director

RLS/SHH:vog
Attachment

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. James M. Taylor, Director (w/a)
Office of Inspection & Enforcement
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

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Response to Violation 50-416/85-02-01

Notice of Violation

Technical Specification 6.8.1 requires that procedures be established, implemented, and maintained for testing activities.

Contrary to the above, procedures were not properly implemented/followed in that on November 29, 1984, testing equipment was not installed in accordance with Startup Test Procedure SU-23-2, "Feedwater System Testing". The improper installation resulted in a loss of feedpump control and an impending loss of feedwater followed by a manual reactor scram.

I. ADMISSION OR DENIAL OF THE ALLEGED VIOLATION

Mississippi Power & Light Company (MP&L) admits to the alleged violation. However, the violation did not affect the health and safety of the public.

II. REASONS FOR THE VIOLATION IF ADMITTED

Startup Test Procedure SU-23-2, "Feedwater System Testing", did not provide for step-by-step sign-offs for the installation of test equipment. The procedure, instead, provided step-by-step directions for accomplishing all the steps and a single, independent verification sign-off.

A combination of defective test equipment and mislanding of the ground lead resulted in the loss of feed pump control and impending loss of feedwater followed by a reactor scram. A contributing factor was inadequate independent verification of the proper installation of the test equipment. (Details of the reactor scram are provided in MP&L's Licensee Event Report (LER) 84-053-01, attached to AECM-85/0066 dated February 28, 1985.)

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

A. The General Manager informed his superintendents and supervisors, by memo, of the seriousness of independent verification practices at GGNS. Special emphasis was placed on these key areas:

- (1) Independent verification shall be independent. The person performing the verification will function in series and not in parallel with the installation activity.
- (2) Plant administrative controls for lifted wires and jumpers are to be used in addition to startup procedures for sign-off requirements.
- (3) Test engineers must be totally familiar with their test equipment and its effect on plant systems prior to performing the test evolution.

- B. The technicians involved were given letters of reprimand.
- C. The independent verification practices in the startup test procedures were reevaluated by the Startup Engineering Department. The Startup Engineering Department is revising, prior to usage, those test procedures requiring test equipment installations. These revisions will provide enhanced details for performing independent verifications.

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

MP&L considers the action discussed in III above sufficient to prevent further violations.

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.