



ENTERGY

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December 22, 1992

U.S. Nuclear Regulatory Commission  
Mail Station P1-137  
Washington, D.C. 20555

W. T. Cottle  
Vice President  
Operations  
Grand Gulf Nuclear Station

Attention: Document Control Desk

Subject: Grand Gulf Nuclear Station  
Unit 1  
Docket No. 50-416  
License No. NPF-29  
Response to Violation for Failure to Follow Vendor  
Manual Procedure  
Report No. 50-416/92-26, dated 11/24/92  
(GNRI-92/00238)

GNRO-92/00152

Gentlemen:

Entergy Operation, Inc. hereby submits the response to the Notice  
of Violation 50-416/92-26-01.

Yours truly,

*W. T. Cottle*

WTC, RSJ/

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**Notice of Violation 92-26-01**

10 CFR 50, Appendix B, Criterion VI, Document Control, requires that measures be established to control the issuance of documents, such as instructions, procedures, and drawings, including changes thereto, which prescribe all activities affecting quality. These measures shall assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel and are distributed to and used at the location where the prescribed activity is performed.

Administrative procedure 01-S-05-4, Control of Vendor/Technical Manuals, Revision 12, paragraph 6.7 requires that manuals that are lost and later found be returned to Document Control for disposition. Paragraph 6.8 of the subject procedure further specifies that personnel who receive manuals that are lost and later found be returned to Document Control for disposition. Paragraph 6.8 of the subject procedure further specifies that personnel who receive manuals, revisions, or information from vendors should send this information to Document Control for processing.

Contrary to the above, the controlled copy of vendor 'Lube Manual' located in the control room was reported as lost, removed from the controlled list, later found and placed back in service, without being returned to Document Control for disposition. This resulted in the use of an uncontrolled document for determining lubrication requirements for plant equipment.

Additionally, subsequent vendor supplied proposed 'Lube Manual' recommendations dated October 1990 were received on site for comments. This new 'Lube Manual' contained errors which were being resolved between plant staff and Mobil.

**I. Admission or Denial of the Alleged Violation**

Entergy Operations, Inc. admits to this violation.

**II. The Reason for the Violation, if Admitted**

During the first quarter of 1990, Document Control personnel recalled controlled copy number 15 of the lubrication vendor manual from the main control room, in order to update the manual. Control room personnel were unable to locate the manual and generated a Lost Manual Form in accordance with Administrative Procedure 01-S-05-4. Copy number 15 was then removed from the active vendor manual records.

Subsequent to the completion of the lost report, the manual was located and used to specify lubrication for plant equipment. It was later discovered that the manual was missing two previous updates. An updated replacement manual was then issued by Document Control.

The first update consisted of specified oil requirements for P75D012A/B/C/D, starting air drying tower regulating valve lubricators. Prior to this revision there were no specific oil requirements for the lubricators. The second update added a new recommendation for the condenser tube cleaning system ball recirculation pump and motor, N71C003A/B. The Operations vendor manual did not contain the official 1N71C003A/B requirements but did contain a markup which specified Mobil Vactra Light Oil for the pump bearings. This was the only portion of the vendor manual update used by Operations as they do not add oil to the motor bearings.

The cause of the lack of administrative control of vendor manuals contained in the control room was due to the responsible administrative specialists unfamiliarity of required processing of vendor manuals.

The cause of failure to follow procedure for processing of the vendor manual update is unknown due to the discontinued employment of the involved System Engineer.

### III. Corrective Steps Which Have Been Taken and Results Achieved

A new copy of the 'Lube Manual' was placed in the control room to replace the out of date manual.

The importance of adhering to the vendor manual update process was discussed with the responsible Performance and System Engineering personnel. Additionally a method has been setup to handle future revisions more effectively.

Performance and System Engineering reviewed selected trip sensitive or production systems vendor manuals to verify no immediate concerns exist regarding lube oils that would affect these systems. For the 'Lube Manual', the vendor and the responsible engineer has set up a method to better handle future revisions.

IV. Corrective Steps to be Taken to Preclude Further Violations

The importance of adhering to the vendor manual update process will be stressed with the Operations administrative specialist.

A review of vendor manuals is being conducted by Operations to determine which vendor manuals should remain in their inventory as controlled documents. Following this review the manuals chosen to remain will be verified to contain the latest updates.

V. Date When Full Compliance Will Be Achieved

These actions will be completed by January 15, 1993.