



MISSISSIPPI POWER & LIGHT COMPANY

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May 6, 1985

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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. 50-416/85-06, dated
April 5, 1985 (MAEC-85/0116)
AECM-85/0145

This is in response to your letter dated April 5, 1985, which contains a Notice of Violation (50-416/85-06-01) and Notice of Deviation (50-416/85-06-02). Our responses to the notices are attached.

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. R. C. Butcher (w/a)

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 NRC VIOLATION 50-416/85-06-01

Notice of Violation

10CFR50, Appendix B, Criterion VI states in part, that measures shall be established to assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel.

Contrary to the above, Loop Calibration Instruction 07-S-53-B21-2 was inadequate in that it permitted level transmitter B21-LT-R009B to be improperly aligned resulting in a Division II Emergency Safeguards Features actuation.

I. ADMISSION OR DENIAL

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

II. REASON FOR THE VIOLATION

Maintenance technicians were performing Loop Calibration Instruction 07-S-53-B21-2 on reactor vessel level instrument B21-PD1-R009B. This instruction did not have a specific valving sequence for returning the instrument to service. Since no valving sequence was provided in this instruction, the technicians used the sequence specified in General Maintenance Instruction 07-S-13-1, "Calibration of Instrument Loops", to restore the instrument to service. This general instruction is used whenever instruments are restored to service and a specific restoration sequence is not provided in the loop calibration instruction.

The valving sequence in the general instruction was not the desired sequence and the procedure did not specify raising the transmitter sensing line to process pressure prior to opening the process isolation valves. This practice is used in other procedures to reduce the probability of false transient signals during the restoration process. The differential pressure sensed by the reactor vessel level transmitters indicated a false low reactor vessel water level condition, which resulted in a Division II Emergency Safeguards Features actuation.

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

- (A) Instrument control procedures dealing with differential pressure transmitters on the reactor vessel were reviewed to determine which restoration sequence required correction or improvement.
- (B) Those procedures determined to need a revision were changed. Included is an attachment listing those procedures changed.

- (C) The task cards for the calibration of the instruments listed in the attachment were revised to establish that routine calibration will be performed when the plant is in the shutdown mode. Non-routine calibration, brought about by such occurrences as instrument failure or suspected failure, will be performed in any plant condition in order to support safe operation of the facility.

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

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

V. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved.

Attachment to Response to Violation

<u>INSTRUMENT</u>	<u>PROCEDURE</u>	<u>REVISION</u>
Q1B21-LT-N027	07-S-53-B21-22	Rev. 2
Q1B21-LT-N044C&D	07-S-53-B21-26	Rev. 4
Q1B21-LTPDT-N032	07-S-53-B31-23	Rev. 3
Q1B21-PD1-R009A&B	07-S-53-B21-2	Rev. 3
Q1BB21-PD1-R005	07-S-53-B21-2	Rev. 3
Q1B21-LT-N073-C -G -L -R	06-IC-1B21-R-0033-TR	Rev. 22 TCN #7
Q1B21-LT-N080-A -B -C -D	06-IC-1B21-R-0019-TR	Rev. 23 TCN #5
Q1B21-LT-N081-A -B -C -D	06-IC-1B21-R-0023-TR	Rev. 23 TCN #4
Q1B21-LT-N091-A -B -E -F	06-IC-1B21-0031-TR	Rev. 22 TCN #6
Q1C34-LT-N017	07-S-53-C34-6	Rev. 8

RESPONSE TO NOTICE OF DEVIATION 50-416/85-06-02

Notice of Deviation

TMI Action Item II.K.3.17 requires reports on Emergency Core Cooling Systems (ECCS). By letter dated June 12, 1981, from L. F. Dale (MP&L) to H. R. Denton (NRC) the licensee committed to submit a summary of ECCS outage data annually in order to meet the reporting requirements of II.K.3.17. Contrary to the above, as of March 15, 1985, no annual reports of ECCS data had been submitted.

I. CORRECTIVE ACTIONS

The intent of item II.K.3.17 as stated in NUREG-0737 was to obtain "unreliability" information so that the NRC could "determine if a need exists for cumulative outage requirements in the technical specifications". Grand Gulf Unit 1 is still in startup testing. ECCS outage information developed while in this condition could result in an undesired skewed effect on the data and provide an unsound basis for the NRC's determination of requirements.

A request to withdraw the commitment has been submitted to the Office of Nuclear Reactor Regulation (NRR). Based on discussions with the NRR staff, the requirement of item II.K.3.17 is met by MP&L's participation in the Nuclear Plant Reliability Data System (NPRDS) program and compliance with 10CFR50.73; therefore, a separate program for reporting ECCS outage information is redundant and is not required.

II. ACTIONS TAKEN TO AVOID FURTHER DEVIATIONS

No further action is required.

III. DATES WHEN ACTIONS WERE OR WILL BE COMPLETED

Actions are complete. MP&L participates in the NPRDS program and complies with 10CFR50.73.